

Internal Governing Policies

#177 - Dishonest or Fraudulent Activities and Whistleblower Policy

Approved: June 16, 2004

Monitor: President

Employees are prohibited from engaging in fraudulent or dishonest conduct. Examples of fraudulent or dishonest conduct include, but are not limited to forgery or unauthorized alteration of University documents, including checks, bank drafts, or any other financial document; misappropriation or theft of funds, securities, supplies, or other assets; impropriety in handling or reporting of money or financial transactions; accepting or seeking anything of material value from contractors, vendors or persons providing services/materials to the University; destruction, removal, or inappropriate use of University records, furniture, fixtures, and equipment; and/or any similar or related inappropriate conduct. An employee shall report any possible fraudulent or dishonest activities related to funds or property belonging to the University to their manager or supervisor. Managers or supervisors shall report suspected fraudulent or dishonest conduct to the University Police Department and/or the University's Ethics Officer or the State Office of the Executive Inspector General, as appropriate. If an employee finds it difficult to report fraudulent or dishonest conduct directly to a manager or supervisor, the employee may make the report directly to one of the aforementioned offices.

Any employee who engages in fraudulent or dishonest conduct or any manager or supervisor who fails to report such conduct will be subject to disciplinary action which could result in suspension, dismissal, or termination and/or civil or criminal prosecution.

Any person who discloses or threatens to disclose to a supervisor or to any public body an act or omission that the person reasonably believes to be a violation of law, rule, or regulation by another State employee, or provides information to or testifies before any public body conducting an investigation, hearing, or inquiry into a violation of law, rule, or regulation, or assists or participates in a proceeding to enforce the State Officials and Employees Ethics Act, shall be considered a "whistleblower" and any employer who retaliates against a whistleblower shall be subject to disciplinary action which could result in suspension, dismissal, or termination. Employees are also protected from retaliation by the Illinois Human Rights Act. Claims of retaliation may be made to the University's Office of Civil Rights and Diversity, the Office of Employee and Labor Relations, the University's Ethics Office, and/or the State Office of the Executive Inspector General, as appropriate.

A manager or supervisor receiving a report of fraudulent or dishonest conduct shall not contact the person suspected to further investigate the matter or demand restitution; shall not discuss the case with anyone other than the University's Ethics Officer, State Office of Executive Inspector General, University's General Counsel, or University Police Department; shall direct all inquiries from any attorney to the University's General Counsel; shall direct all inquiries from the media to the University's

External Relations Office, or in the event that External Relations cannot be contacted, to the University's General Counsel.

The University encourages reporting suspected dishonest or fraudulent activity and will appropriately investigate all complaints received in a manner that insures that evidence is properly maintained. Complaints shall be in writing and signed by the Complainant. General concerns about university matters should normally be directed to the individual's supervisor or vice president. Concerns about ethical misconduct or illegal behavior should be submitted to the University's Ethics Office, who is the University's General Counsel, or to the State Office of the Executive Inspector General, as appropriate. All complaints regarding discrimination and harassment should be directed to the University's Office of Civil Rights and Diversity. Concerns regarding health and safety issues should be directed to the Environmental Health and Safety Department.

This policy is intended to compliment and supplement existing policies and legal requirements. No statement in this policy is intended to authorize or to prohibit disciplinary and/or legal action against a University employee who makes baseless allegations or knowingly discloses information recognized or designated as confidential under law. Where specific provisions exist somewhere else under law or University policy governing information disclosure rights and obligations and/or retaliation relative to such disclosures, those shall apply in lieu of those contained in this policy.