

Long Island University

Whistleblower Policy

Application of Policy

This policy applies to all members of the University community, including, without limitation, Long Island University students, faculty, staff, administration or other employees or officers.

Statement of Policy

Long Island University is committed to access and excellence in education, including the highest standards of integrity in performance of its mission. To help identify and address concerns about possible legal or policy violations in University activities and operations including, but not limited to, finance, research, human resources, athletics, risk and safety and information technology, the University has developed a process for employees to report any good faith belief that a violation has occurred. A "good faith" belief means that the individual reporting alleged misconduct has an honest belief that the misconduct may have occurred and is aware of a fact which would support that belief, though it does not have to be a certainty. However, if an individual makes an allegation and either disregards or is purposefully ignorant to facts that would disprove the allegation, this is not good faith. Allegations may include requests by a supervisor or any University employee to violate a law or University policy. In general, allegations may also include bribery, theft, financial or accounting fraud, any false, erroneous or misleading statement made directly or indirectly to a student, prospective student, member of the public, accrediting agency or state or federal agency regarding (i) the nature of the University's educational programs, (ii) its financial charges, or (iii) the employability of its graduates, and any other types of corruption or acts which endanger the University public health or safety. University employees may not directly or indirectly use or attempt to use the official authority or influence of their positions or offices to interfere with the right of an individual to report any alleged inappropriate conduct.

These allegations may be made on an anonymous basis and, even if not on an anonymous basis, without fear of adverse action taken because of any good faith allegations. Reporting individuals who believe they have been subject to retaliation will have the ability to make a report to the University. However, raising allegations under this policy will not interfere with legitimate employment decisions and any report that proves to have been both unsubstantiated and made with malice or with knowledge of its falsity is not protected by this policy.

Reporting Options

Any person who has a good faith belief that there has been any violations of law, breaches of policy or allegations of improper conduct pertaining to the University may file a report through EthicsPoint/NAVEX Global, which can be found on the [EthicsPoint site](#), or by calling the EthicsPoint/NAVEX Global toll free number, 866-295-3143. If a report is submitted through EthicsPoint/NAVEX Global (either in writing or via telephone), the allegations made in the report will be given careful consideration by appropriate University executive personnel. The report may be filed on an anonymous basis, but because investigators are unable to interview anonymous whistleblowers, it may be more difficult to evaluate the credibility of the allegations and therefore, less likely to permit an investigation to be initiated, continued or successfully completed.

Employees should not feel limited to making a report through EthicsPoint/NAVEX Global. A report by a University employee of suspected improper conduct described above may also be made to a University administrator who can properly address these concerns. In many cases the individual's supervisor is in the best position to report to. If an employee is not comfortable speaking with the supervisor or is not satisfied with the supervisor's response, the employee should take his or her concerns to a University officer whom the employee believes has the authority to review the alleged improper conduct on behalf of the University.

If an employee wishes to make a report against a University officer, the employee may contact the Chair of the Audit Committee of the Long Island University Board of Trustees by using EthicsPoint/NAVEX Global, or by sending an e-mail addressed to auditchair@liu.edu or by writing to Audit Committee Chair,

c/o The Office of the University Counsel, Long Island University, 700 Northern Boulevard, Brookville, New York 11548. Written complaints made to the Audit Committee Chair will be delivered unopened to the Audit Chair, and complaints filed through EthicsPoint/NAVEX Global will not be viewable by any University employee. Although every effort will be made to maintain confidentiality, there can be no absolute guarantee of confidentiality. Therefore, in some cases, employees may wish to maintain anonymity.

Reports, even to supervisors, are encouraged to be made in writing so as to assure a clear understanding of the issues raised, but the report may be made orally. Whether a report is made on EthicsPoint/NAVEX Global or in person to a University supervisor, officer or the Audit Committee Chair, the report should be factual rather than speculative or conclusory, and contain as much specific information as possible to allow for proper assessment of the nature, extent and urgency of the investigation. Requests for confidentiality will be honored to the extent reasonable within the legitimate needs of law and the investigation.

Investigation Process

Any individual who receives a report alleging suspected improper conduct must report the matter to the Office of the University Counsel (at 516-299-3665 or legaldept@liu.edu), except where a report of improper conduct involves an Officer of the University. If a matter involves a University Officer, the report must be directed to the Chair of the Audit Committee of the Long Island University Board of Trustees as outlined above. In such circumstance the Audit Committee is empowered to retain outside counsel or another appropriate investigator to investigate the claim. The individual should not engage in any investigation of the allegations. Rather, the Office of the University Counsel (or where appropriate, outside counsel) will make an initial inquiry to determine whether an investigation is appropriate, and the form that it should take. Some concerns may be resolved without the need for investigation. An investigation will begin if and only if the preliminary information establishes that the allegation, if true, demonstrates improper conduct and is either accompanied by information specific enough to be investigated, or has (or directly points to) corroborating evidence that can be pursued.

If continued, the investigation may consist of interviews, review of documents or a combination of the two, among other things. Those conducting the investigation will notify the reporting individual of their findings directly, or indirectly through EthicsPoint/NAVEX Global where appropriate, and prepare other reports as needed under the circumstances.