



**Policy Number and Chapter:** 04.009 Administration

**Policy Title:** Reporting Suspected Wrongdoing

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**Policy Statement.** UNT supports and promotes a culture of compliance and accountability that encourages all members of the UNT community to conduct themselves lawfully, honestly and with integrity. Everyone within the UNT community is expected to operate in an ethical, honest and lawful manner. Preventing and detecting criminal conduct is critical to achieving these goals. UNT expects and encourages all members of its community, including faculty, students, staff and individuals authorized to act on behalf of UNT to make good faith reports of suspected wrongdoing. Retaliation against those making good faith reports of misconduct is prohibited.

**Application of Policy.** Employees, students and individuals authorized to act on behalf of UNT.

**Definitions.**

1. **Employee.** “Employee” means an individual who is employed part-time, full-time, or in a temporary capacity as faculty, staff, or who is required to be a student as a condition of employment.
2. **Good Faith Report.** “Good faith report” means a reasonable belief that the reported conduct violates law, Regents Rule, System Regulation or institutional policy based on the reporting individual’s training and experience.
3. **Retaliation.** “Retaliation” means any action, treatment or condition likely to dissuade a reasonable person from reporting or causing to report, or from participating in an investigation of suspected wrongdoing or noncompliance or a related proceeding, including an action that affects an individual’s enrollment or business relationship, or an employee’s compensation, promotion, transfer, work assignment, or performance evaluation.
4. **Student.** “Student” means an individual who has applied for admission or readmission to UNT, who is registered or enrolled in one or more courses for credit at UNT, or who currently is not enrolled but has a continuing academic relationship with UNT.
5. **Wrongdoing.** “Wrongdoing” means fraud, waste, abuse, illegal activity, conflict of interest, financial misstatement, accounting irregularity, or violation of federal or state law, Regents Rule, System Regulation, or institutional policy.

**Procedures and Responsibilities.**

1. **Reporting Obligation of Employees and Individuals Authorized to Act on Behalf of UNT.** Employees and individuals authorized to act on behalf of UNT are required to promptly

report suspected wrongdoing of any kind to their direct supervisor. If the direct supervisor is the person suspected of the wrongdoing, the report must be made to that individual's supervisor or to the Office of Institutional Compliance. A supervisor who receives a report of suspected wrongdoing shall, without exception, forward the report to the Office of Institutional Compliance. In no instance is an individual required to report the alleged violation to the person suspected of the wrongdoing. The requirement to report suspected wrongdoing under this policy is in addition to and does not replace, change or modify reporting requirements under federal or state laws.

**Responsible Party:** Employees and individuals authorized to act on behalf of UNT

2. **Reporting Encouraged by Students and Other Individuals.** Students and other individuals are strongly encouraged to report suspected wrongdoing of any kind. Reporting suspected wrongdoing under this policy is in addition to and does not replace, change or modify reporting requirements under federal or state law.

**Responsible Party:** Students and other individuals

3. **Reporting Suspected Wrongdoing.**

- a. **Criminal Conduct.** Criminal conduct should be reported to the UNT police or local law enforcement authorities.
- b. **Other Suspected Wrongdoing.** All suspected wrongdoing that is not reported to law enforcement may be reported to the Office of Institutional Compliance, the appropriate federal or state agency with authority to address the suspected wrongdoing, or to the appropriate university or System office, including the UNT Office of Equal Opportunity, the Dean of Students, Human Resources and the UNT System Internal Auditor. Employees who receive a report of suspected wrongdoing are responsible for forwarding the report to the Office of Institutional Compliance or to the appropriate university or System department. Reports regarding suspected wrongdoing involving a member of the Institutional Compliance Office should be made to the Office of the President.
- c. **Anonymous Reporting.** Individuals wishing to remain anonymous may report suspected wrongdoing to the UNT Compliance Hotline at <http://unt.ethicspoint.com>.

**Responsible Party:** Appropriate department

4. **Addressing Reports of Suspected Wrongdoing.** Officials who receive a report of suspected wrongdoing shall determine whether an investigation is appropriate and resolve the report in accordance with legal requirements and the requirements of applicable UNT policy. The President, UNT Compliance Officer, Vice Chancellor and General Counsel, and Chief Internal Auditor shall be informed of suspected wrongdoing that may pose a

risk of significant liability or reputational harm to the university or of other reports or matters that may be a significant compliance concern. The Board of Regents shall be informed of suspected wrongdoing that poses a risk of significant liability or reputational harm to the university, or of other reports or matters that are a significant compliance concern in the judgment of the President or UNT Compliance Officer. In determining whether to inform the Board, officials should consult the Chancellor, Vice Chancellor and General Counsel or Chief Internal Auditor as appropriate.

**Responsible Party:** UNT Officials

5. **Responsibility to Cooperate in Investigation of Suspected Wrongdoing.** Individuals are expected to be truthful and cooperative in an investigation of suspected wrongdoing. Although cooperation is expected, a person who makes a report is not entitled to be involved in the investigation or to be advised of the status or disposition of a matter unless required by law.

**Responsible Party:** All individuals

6. **Responsibility to Report Suspected Child Abuse.** Individuals are required by Chapter 261 of the Texas Family Code to immediately report to local or state law enforcement authorities or to the Texas Department of Family and Protective Services when there is reason to believe that a child's physical or mental health or welfare has been adversely affected by abuse or neglect. Under this Policy, Employees and Students, and individuals authorized to act on behalf of UNT are required to report child abuse and neglect in accordance with the specific manner required by Chapter 261 of the Texas Family Code, which is more specifically explained in UNT Policy 04.010, Reporting of Child Abuse and Neglect. Informing a supervisor or other official of UNT does not fulfill this legal reporting requirement, however, a person who makes a report of abuse or neglect as statutorily required also should provide notice to the Institutional Compliance office or the Dean of Students Office when the report is made. Failure to report when required by law is a crime and grounds for disciplinary action or revocation of authority to act on behalf of UNT.

**Responsible Party:** All individuals

7. **Protection against Retaliation.** No action shall be taken against any individual who, in good faith, reports or causes to be reported suspected wrongdoing or who assists in an authorized investigation of suspected wrongdoing. This protection does not extend to disciplinary action for self-reported violations. Any individual who engages in Retaliation may be subject to disciplinary action, including termination of employment, authority to act on behalf of UNT, enrollment as a student, or business relationship.

**Responsible Party:** All individuals

8. The Institutional Compliance Office and the Dean of Students Office will publish on their websites contact information for receiving reports of suspected wrongdoing and

retaliation.

**Responsible Party:** Institutional Compliance and Dean of Students Office

**References and Cross-references.**

Regents Rule 04.1100, Reporting Suspected Wrongdoing

UNT Policy 04.006, Responsibilities and Rights of Employees under the UNT Compliance Program

UNT Policy 04.010, Reporting of Child Abuse and Neglect

UNT Policy 05.015, Ethics

<b>Policy Contact:</b>	Clay Simmons
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