

MOUNT VERNON NAZARENE UNIVERSITY
WHISTLEBLOWER POLICY

Purpose

The purpose of this whistleblower policy is to provide procedures for reporting unlawful or fraudulent activities and to protect Mount Vernon Nazarene University trustees, administrators, professors, staff, and students who make such reports.

General

The Mount Vernon Nazarene University requires its trustees, administrators, professors, staff, and students to observe a high standard of personal, business, and academic ethics. In observing those high ethical standards, all MVNU personnel associated with MVNU must act with honesty and integrity in carrying out their duties and responsibilities to ensure compliance with all applicable federal, state and local laws and regulations.

Reporting

All trustees, administrators, professors, staff, and students have a responsibility to report violations or suspected violations of unlawful or fraudulent activities in accordance with the MVNU whistleblower policy. If a trustee, administrator, professor, staff member, or student becomes aware in the course of their employment of a violation of any state, federal or local law or regulation by MVNU as an institution, an MVNU trustee, administrator, professor, staff member, or student and it is within the authority of MVNU to correct, the individual shall orally notify his or her employer or other responsible officer of MVNU, including the Compliance Officer. The individual shall subsequently file with that supervisor or officer a written report that provides sufficient detail to identify and describe the violation.

No Retaliation

This policy is intended to encourage individuals to make reports of known or suspected unlawful or fraudulent activities. Any retaliation by MVNU toward the initiator of any report made in good faith will not be tolerated. This includes harassment of any kind including threat of or action involving an adverse employment consequence. Action will be taken against any trustee, administrator, professor, staff member, or student who takes retaliatory action an individual who has made good faith report of a violation. This action may include termination of employment or loss of position.

Reporting Procedures

With respect to allegations of unlawful, fraudulent, or criminal activities, Mount Vernon Nazarene University has an open door policy with its trustees, administrators, professors

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staff, and students. If a trustee, administrator, professor, staff member, or student becomes aware in the course of their employment of an unlawful or fraudulent act, or a violation of any state, federal or local law or regulation by MVNU as an institution, an MVNU trustee, administrator, professor, staff member, or student, the individual shall orally notify his or her supervisor. The individual shall subsequently file with that supervisor or officer a written report that provides sufficient detail to identify and describe the violation. If the allegation concerns the supervisor, or the employee feels uncomfortable with giving this information to the supervisor, he/she may make a report to any supervisory employee of MVNU or directly to the MVNU Compliance Officer. At all times you may contact the Compliance Officer directly. All supervisors and managers are required to report any complaints they receive to the MVNU Compliance Officer, Dr. Margie Bennett, who has responsibility and authority to investigate all reported violations.

Handling of Reported Violations

The Compliance Officer will notify the person making the report within twenty-four (24) hours of receipt of the report. All reports will be promptly investigated and appropriate action will be taken in accordance with the results of the investigation.

Reporting of Crimes

A trustee, administrator, professor, staff member, or student in addition to any other violations should also report any violation by another of any criminal offense that is (a) likely to cause an imminent risk of physical harm to persons, or (b) a hazard to public health or safety.

Compliance Officer

The Compliance Officer is responsible for investigating and resolving reported complaints. At the Compliance Officer's discretion, he/she shall advise the President or Chairperson of the Board of Trustees. The Compliance Officer's office is located in the Lakeholm Administration Building and can be reached at 740 392-6868 ext. 4121

Good Faith

Anyone filing a complaint in good faith with reasonable grounds for suspecting a violation will not be punished. However, any reports made maliciously or knowingly to be false will not be tolerated, and anyone making such a report will face serious disciplinary action.

Confidentiality

Reports of violations or suspected violations may be submitted on a confidential basis or anonymously. To the extent possible, reports will be kept confidential. The need to conduct an adequate investigation may require disclosure to certain persons.

Questions

Any questions or comments about this policy should be sent to:

Dr. Margie Bennett
Mount Vernon Nazarene University
800 Martinsburg Road, Mount Vernon, OH 43050
mbennett@mvnu.edu

Reference: Ohio Revised Code Section 4113.52