

Whistleblower Policy

Purpose

The purpose of this policy is to communicate adherence to the University's policies and procedures and to encourage good faith reports of allegations of misconduct concerning compliance with Detroit Mercy's policies and procedures. Detroit Mercy's Conflict of Interest and Code of Ethics Policy requires directors, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities.

Policy

Detroit Mercy relies on its employees to perform their duties and responsibilities in accordance with the University's policies and procedures. Detroit Mercy provides various mechanisms to assist and encourage employees to come forward in good faith with reports or concerns about suspected compliance issues. Employees may report suspected non-compliance issues without fear of reprisal or retaliation. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

Guidelines

1. An employee should follow all Detroit Mercy policies and procedures in carrying out his/her duties for the University.
2. An employee who has a question about the propriety of any practice under Detroit Mercy policies and procedures should seek guidance from his/her supervisor or the Detroit Mercy official who has responsibility for overseeing compliance with the particular policy or procedure.
3. An employee who becomes aware of a potential or actual material violation of Detroit Mercy policies or procedures should report such potential or actual conduct regardless of whether the employee is personally involved in the matter.
4. An employee may request that such a report be handled as confidentially as possible under the particular circumstances, and Detroit Mercy will endeavor to handle all such reports with discretion and with due regard for the privacy of the reporting employee.
5. An employee may make anonymous reports with the understanding that any investigation may be hampered due to the inability to identify the employee in order to obtain a full and complete account of relevant and necessary facts from the employee or to ask additional questions or seek clarification as any investigation proceeds.
6. In order to provide multiple methods of reporting potential or actual material violation of Detroit Mercy policies or procedures and to provide a safe mechanism to make a report and remain anonymous, the University has implemented a toll free call in line and a web-based tool for reporting purposes. The call in line and web-based tools are managed by EthicsPoint. In order to make a report, employees can

call **1-855-278-2072** or go to [File an Ethics Report](#) and choose "File A New Report." Enter "*University of Detroit Mercy*", and go to our page to file your report.

7. An employee who comes forward in good faith with reports or concerns about compliance with Detroit Mercy policies or procedures shall not be subject to reprisal or retaliation for making such a report. Any employee who believes that he/she is being retaliated against for making such a report should immediately bring it to the attention of his/her dean or the Vice President for Academic Affairs (for an academic employee) or the Associate Vice President for Human Resources for further investigation.

Points of Contact

An employee is encouraged to make such a report to his/her immediate supervisor. If the employee feels unable to do so or if there is any reason why this may not be appropriate, the employee should raise the issue with his/her manager, department chair, dean, director or the University office or official who has responsibility for overseeing compliance with the particular policy or procedure in accordance with the guidelines below. An employee who is unsure to whom he/she should make a report or address his/her concerns should consult with the Associate Vice President for Human Resources.

- In the event of any claim of financial misconduct or inappropriate expenditure of funds (including all federal and non-federal grant funds), or any claim regarding questionable internal controls, accounting practices or auditing matters, the employee should follow the guidelines above, but should also make such report to the Associate Vice President of Finance / Controller.
- An employee with reports or concerns about Detroit Mercy's labor relations policies and procedures is encouraged to consult with the Associate Vice President for Human Resources.
- An employee with reports or concerns about Detroit Mercy's non-discrimination policy is encouraged to consult with the Senior Attorney or the Associate Vice President for Human Resources.
- An employee with reports or concerns about conflict of interest should consult with his/her manager, department chair or director, but in the case of questions concerning such supervisory personnel, the employee should also feel free to consult with the dean or the appropriate Detroit Mercy official who is responsible for the unit.
- An employee with reports or concerns about workplace safety issues is encouraged to consult with the Associate Vice President for Facilities Management.

- An employee with reports or concerns about academic fraud or scientific research misconduct should consult with the appropriate department chair, dean, or the Vice President for Academic Affairs.
- An employee who is unsure to whom he/she should make a report or address his/her concerns should consult with the Senior Attorney, the Associate Vice President for Human Resources, or any Vice President of the University.

Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violation of Detroit Mercy policies and procedures must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of Detroit Mercy policies and procedures. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

Accounting and Auditing Matters

The Finance Committee of the Board of Trustees shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The Senior Attorney or the Associate Vice President for Human Resources shall immediately notify the chairman of the Finance Committee of any such complaint and work with the committee until the matter is resolved.

Handling of Reported Violations

The Detroit Mercy official who receives notification of the reported or suspected violation must acknowledge such receipt to the sender within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.