

Lawrence University Fraud Reporting Policy

I. Policy

Lawrence University requires its directors, officers, faculty, staff, students, volunteers and others involved in campus operations to observe high standards of business and personal ethics in the conduct of their duties and responsibilities within the University. As representatives of the University, we must practice honesty and integrity in fulfilling our responsibilities and must comply with all applicable laws and regulations.

II. Purpose

The purpose of this policy is to foster an ethical and open work environment, ensure the University has a governance and accountability structure that supports its mission, and to encourage, enable and protect its directors, officers, faculty, staff, students, volunteers and others of the University to raise serious concerns about the occurrence of illegal or unethical actions within the University before turning to outside parties for resolution. This policy is intended to encourage individuals who believe fraud is occurring, to bring it to the University's attention. The University will promptly and thoroughly investigate the matter to bring violations to a halt as soon as reasonably possible and to determine further action, which may include discipline of those who engage in unethical or illegal behavior.

III. Scope

This policy applies to all Board members, faculty, staff (paid and volunteer), students and others who are involved in campus operations (such as vendors and contractors).

IV. Terms and Definitions

- **Wrongful conduct:** Actual or suspected violation of Lawrence University policy, applicable state or federal law, or use of University property or resources for personal gain, except as permitted under Lawrence University policy.
- **Protected Disclosure:** Communication about actual or suspected wrongful conduct engaged in by a University officer, director, faculty, staff, student, volunteer, or other person involved in campus operations based on good faith belief and reasonable indications.
- **Retaliation:** Adverse actions, threats, and/or discrimination against an individual because he or she made a Protected Disclosure or participated in an investigation related to a Protected Disclosure. Adverse actions may include firing, demotion, suspension, harassment, failure to consider the employee for promotion, or any other discrimination.
- **Fraud Reporter:** A person who reports wrongdoing within the University according to the Reporting Process described below.

V. Procedures and Guidelines

Reporting Responsibility

The Fraud Reporter is encouraged to promptly report the suspected or actual wrongful conduct and must act in good faith, without malice to the organization or to any individual in the organization.

All reports of fraud will be taken seriously and therefore handled in a strict, confidential manner. An individual who makes a disclosure that is not done in good faith will be subject to discipline, including termination of the Board or employee relationship.

Department Name: Human Resources

Department Location: Brokaw Hall

Revised Date: 6.29.2016

Department Phone Number: 920-832-6543

Department Email: humanresources@lawrence.edu

Department Hours: 8:00-12:00 and 1:00-5:00

No retaliation

The Fraud Reporter is encouraged to bring any fraudulent activity forward, and by doing so the individual shall not receive retaliation for the Protected Disclosure. After investigation, if the matter which was reported is determined not to constitute improper wrongful conduct, there will be no retaliation against the Fraud Reporter.

Anyone who retaliates against a Fraud Reporter who makes a Protected Disclosure will be subject to discipline, including termination of Board or employee status. Any known retaliation is encouraged to be reported to the Vice President of Finance and Administration or Provost.

Reporting Process

1. An individual who witnesses or has knowledge of fraudulent activity (the Fraud Reporter) shall report to the Vice President of Finance and Administration or Provost as contact points. If the individual is uncomfortable or otherwise reluctant to report to the contact points, they are encouraged to report the event to the Chair of the Audit committee. Contact details for these contact points are at the end of this policy.
2. Any fraudulent activity should be disclosed within ninety (90) days of the occurrence whenever possible. The disclosure should be made in a signed written document. If the individual is unwilling or unable to put a disclosure in writing, they should report the activity verbally to the appropriate supervisor or contact point in this policy, who will prepare a written summary of the disclosure. The individual shall sign the disclosure and retain a copy for their records.
3. The person(s) charged with alleged fraudulent activity shall be given an opportunity to respond to the allegations in person or in writing.
4. The Fraud Reporter shall receive acknowledgement of the investigation and next steps within five business days of the initial report of Protected Disclosure.

VI. Confidentiality and Record

Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

VII. Investigation and Follow Up

1. Upon the receipt of the Protected Disclosure, the contact points will conduct a thorough investigation regarding the allocations of fraudulent activity.
2. Any and all findings of fraudulent activity and such violations will be brought to a halt immediately. The contact point will determine further action, which may include involvement of Human Resources and discipline for those who engaged in unethical or illegal behavior.
3. A full report of the findings and actions will be presented to the President and Board of Trustees.
4. After the investigation and actions as a result of the investigation are concluded, an executive summary and follow up will be made to the Fraud Reporter as well as recognition for bringing the concern forward.

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VIII. Contact points

Vice President for Finance and Administration:

Christopher Lee
Brokaw Hall #117
Office: 920-832-7694

Email: Christopher.Lee@lawrence.edu

Provost:

David Burrows
Sampson House
Office: 920-832-6528

Email: David.Burrows@lawrence.edu

Audit Committee Chair – Board of Trustees:

Bob Anker
10591 Coppergate Carmel, IN 46032-9204
Mobile: 317-432-3546

Email: bobanker@earthlink.net

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