I. Policy

Luther College is committed to conducting its operations with integrity by engaging in lawful, ethical and respectful practices. For this reason, we have encouraged members of the campus community to make any concerns known to the College. Whether these concerns relate to fraud or crime, security or internet abuses, or fraudulent financial or business practices, violations, or ethical concerns, the doors of College administrators, supervisors, and Human Resources are always open.

II. Purpose

This policy is intended to encourage all Board members, faculty, staff (paid and volunteer) and others to report suspected or actual occurrence(s) of illegal, unethical, or inappropriate events (behaviors or practices) without retribution.

III. Scope

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

IV. Terms and Definitions

- **Whistleblower** - One who reveals wrongdoing within an organization to the public or to those in positions of authority.

V. Procedures and Guidelines

A. The Whistleblower should promptly report the suspected or actual event to his/her supervisor.

B. If the Whistleblower should be uncomfortable or otherwise reluctant to report to his/her supervisor, then the Whistleblower could report the event to the next highest or another level of management, including to an appropriate Board committee or member.

C. The Whistleblower can report the event with his/her identity or anonymously.
   - For these occasions of anonymity, the College has decided to participate in a service called InTouch. (Links to key documents are listed at the end of this policy.) The InTouch system is available for use around the clock, seven days a week. Because InTouch is operated by an independent organization, any calls made through InTouch are completely confidential.
Using this reporting service is easy. If you have a question or concern about a possible violation of Luther’s policies or the law, the College encourages you to express your concerns to any of the persons whose names or titles appear in the policies linked in the last bullet of this section C. If you do not feel comfortable doing so, however, simply dial toll-free to (877) 409-0108 and report your concern anonymously to InTouch.

Once you have dialed the toll-free number, here is how the reporting and follow-up processes will work:

- Your call will be greeted promptly and courteously by a person who makes certain you understand the InTouch program and how it functions.
- At the beginning of the interview, you will be provided with a five-digit, randomly generated case number that you should use to check back for updates and requests for additional information. Be sure to write this number down and remember where you put it.
- You will then be interviewed about the question or concern that is on your mind.
- Your interview will not be recorded. Instead, the interviewer will be typing notes of your conversation. Whether you choose to provide your name is completely up to you.
- Within one business day of your call, a summary of the interview will be forwarded to the appropriate College official—usually the Director of Human Resources. Our goal will be to have a response to your concern in five business days.
- To receive your response, you will need to call back and provide the five-digit case number that was assigned to you. At that time, you might be asked to provide additional information or to call back at a later date. You will be able to keep checking back for updates until your case is closed.

Because of the program’s built-in confidentiality, it is important that you try to be as specific as possible about the information you provide. For example, they will need to know the name of the department or individual you are calling about.

To repeat, at no time is any caller required to identify himself or herself so all information provided can be completely confidential and anonymous.

Please be sure to call back in five business days to check to see if any additional information is needed. If at any time you prefer that someone contact you directly, you can leave your name along with a phone number where and when you would like to be called.

Luther is committed to maintaining the highest standards of behavior in our workplace. If you experience or observe fraud or crime, security or internet abuses, or fraudulent financial or business practices, Luther College hopes you will feel comfortable talking with Human Resources, your supervisor, or with a member of the College administration. If you feel you cannot, however, please use InTouch to report it. Also, if you have any general questions about how InTouch works, call Human Resources directly at x1189.

Links to important documents/policies:
- http://hr.luther.edu/Conduct and Ethics Hotline
- http://luther.edu/policies

D. The Whistleblower shall receive no retaliation or retribution for a report that was provided in good faith – that was not done primarily with malice to damage another or the organization.

E. A Whistleblower who makes a report that is not done in good faith is subject to discipline, including termination of the Board or employee relationship, or other legal means to protect the reputation of the organization and members of its Board and staff.

F. Anyone who retaliates against the Whistleblower (who reported an event in good faith) will be subject to discipline, including termination of Board or employee status.
G. Crimes against person or property, such as assault, rape, burglary, etc., should immediately be reported to local law enforcement personnel.

H. Supervisors, managers and/or Board members who receive the reports must promptly act to investigate and/or resolve the issue.

I. The Whistleblower shall receive a report within five business days of the initial report, regarding the investigation, disposition or resolution of the issue.

J. If the investigation of a report, that was done in good faith and investigated by internal personnel, is not to the Whistleblower’s satisfaction, then he/she has the right to report the event to the appropriate legal or investigative agency.

K. The identity of the Whistleblower, if known, shall remain confidential to those persons directly involved in applying this policy, unless the issue requires investigation by law enforcement, in which case members of the organization are subject to subpoena.

VI. Confidentiality and Record

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.