LUTHER COLLEGE®
POLICIES AND PROCEDURES

Department:	Administrative Services
Subject:	Whistleblower Policy
Date Issued:	May 7, 2009
Date Revised:	March 24, 2021
Approved By:	Audit Committee/President
Date Reviewed:	September 10, 2026

I. Policy

Luther College is committed to conducting its operations with integrity by engaging in lawful, ethical and respectful practices. For this reason, members of the campus community are encouraged to make concerns known to the College. Whether these concerns relate to fraud or crime, security access or internet abuses, fraudulent financial or business practices, violations, or ethical concerns, supervisors, Human Resources, and College administrators should always be accessible to employees with misconduct concerns. In addition, the College has facilitated an anonymous reporting option as set forth by this policy.

II. Purpose

This policy is intended to encourage all faculty, staff, students, volunteers, Board of Regents members and other College representatives to report suspected or actual occurrences of fraudulent, illegal, unethical, or inappropriate events related to behaviors or practices without the fear of retribution.

III. Scope

This policy applies to all faculty, staff, students, volunteers, Board of Regents members and other representatives who are involved in campus operations.

IV. Terms and Definitions

- Whistleblower - One who exposes information or activities within an organization deemed fraudulent, illegal, elicit, unsafe, wasteful or abusive of financial resources to those in positions of authority.

V. Procedures and Guidelines

A. The Whistleblower should promptly report the suspected or actual event to the appropriate Luther College contacts. Supervisors, managers and/or administrators who receive the reports must act quickly to investigate and/or resolve the issue, and the Director of Human Resources is a resource for

assistance. In order of preference, the appropriate Luther College contacts are:

- Their supervisor or manager
- The Office of Human Resources
- Any member of the College administration or Cabinet

B. If the Whistleblower is uncomfortable reporting to the preferred list of contacts, is not satisfied with the responses given, or the issue involves someone in these areas of responsibility, the Whistleblower may remain anonymous by reporting the fraud, crime or concern through a third-party vendor, Lighthouse Services, Inc., operating on behalf of Luther College as the Conduct and Ethics Hotline. **https://www.luther.edu/hr/faculty-staff/conduct-and-ethics-hotline/**

- This service is available 24 hours a day, 7 days a week by dialing toll-free at 1-877-409-0108. The reporting and follow-up process are as follows:
  - A representative of Lighthouse Services will answer the call and guide the caller through a series of questions to help identify concerns
  - The call is not recorded, but notes are taken to document the incident or issue
  - At the beginning of the interview, the caller is given a case number
  - This case number is unique to the issue being reported and should be recorded and stored for future reference

- Due to the program's built-in confidentiality, it is important that the caller:
  - Be as specific as possible about the information provided
  - Be factual about the issue, the date and the time
  - Disclose the name of the department or individual where or of whom there is concern
  - Be assured that the caller is not required to identify themselves – this is strictly voluntary

- Within one business day of the call, a summary of the interview is sent to the Director of Human Resources and at least one other member of the priority contact list.
  - The College will receive a written summary of the call based upon the prioritization contact list. The priority of the summary is contingent upon who is accused of wrongdoing
  - The goal of the College is to respond to the initial claim within 48 hours, if possible, or no later than 5 days
  - If the reporter wishes a response directly from Luther College, the caller must indicate the best way to be reached, either at home or at work, and leave a name and telephone number
  - If the reporter wishes a response directly from Lighthouse Services, the caller must call Lighthouse Services after 5 business days

        - Be prepared to supply the case number
        - Be prepared to provide additional information as needed
        - Keep checking back for updates until the case is closed
    - General questions about the Conduct and Ethics Hotline may be directed to the Director Human Resources, ext. 1415

C. The Whistleblower shall receive no retaliation or retribution for reporting in good faith, without malicious intent to damage Luther College or any member of the Luther community
    - Anyone who retaliates against a Whistleblower who reported an event in good faith will be subject to disciplinary actions, including termination of employment status or Board of Regents membership

D. A Whistleblower who makes an intentionally false report is subject to disciplinary action, including termination of employment. Other legal means may be appropriate to protect the reputation of Luther College and members of the Board of Regents, administration, faculty and staff.

E. Immediately report crimes against person or property, such as burglary, assault, rape, etc., to local law enforcement personnel.

F. Immediately report sexual assault and sexual harassment to the Title IX Coordinator at **https://www.luther.edu/titleix/** or to Campus Safety and Security personnel, ext. 2103. In most situations involving sexual misconduct, the college will honor the wishes of the victim as to whether or not the incident is reported to law enforcement

G. 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 they have the right to report the event to the appropriate legal or investigative agency
    - If the issue requires investigation by law enforcement, confidential status may be compromised
    - Case members of the organization may be subject to subpoena

VI. Confidentiality and Record

Like most organizations, Luther College faces the risks of wrongdoing, misconduct, deception and fraud. As with all business exposures, the College must be prepared to manage these risks and their potential impact in a professional manner. If unethical or illegal practices are reported, confidentiality shall be maintained to the greatest extent possible within the requirements of conducting reasonable investigations. Only those who have an immediate need are provided the identity of the party or parties involved in the fraud. Any attempt by an administrator, a faculty member, staff member or student to penalize or retaliate in any way against a complainant or witness is prohibited specifically by this policy and will be treated as a separate incident subject to the appropriate corrective action.

Luther College is committed to maintaining the highest standards of behavior in the workplace. Additional resources to important documents and policies are below:

https://www.luther.edu/hr/faculty-staff/staff-handbook/
https://www.luther.edu/academics/dean/faculty/resources/handbook/
https://www.luther.edu/policies