

Northwest Foundation, Inc.
Whistleblower Policy

I. Purpose

Northwest Foundation, Inc. is committed to lawful and ethical behavior and expects its staff to act in accordance with all University and Foundation policies and applicable laws and regulations. The purpose of this policy is to encourage employees to report what they, in good faith, believe to be serious violations of University policy, Foundation policy, violations of law, dishonesty, fraud, or other misconduct (collectively, "wrongful conduct") and to protect the person making the report (i.e., the "whistleblower") from retaliatory action.

II. Reporting

A. Activities to Report

The Foundation encourages staff to report suspected wrongful conduct, and this includes, but is not limited to, the following:

1. Theft, misuse, or other misappropriation of University property, resources, or assets;
2. Mismanagement or waste of funds;
3. Improper records destruction;
4. Providing false or misleading information;
5. Unethical activities;
6. A substantial and specific danger to public health or safety;
7. Forgery or unauthorized alteration of documents; and
8. Concealing any of the above actions.

B. Reporting Procedure

An employee wishing to make a report of wrongful conduct under this policy should do so to an appropriate University supervisor as soon as he/she becomes aware of such conduct. The supervisor is then expected to forward the report to the vice president of advancement. If, for any reason, an employee finds it difficult to make a report to a supervisor, he/she may file the report directly to the vice president of advancement. If the subject of the report is the vice president of advancement, the report should be made to the president of the Foundation and the president of the University. In any event, the reporting employee shall make the report to University and Foundation personnel other than and/or in addition to the alleged wrongdoer.

Staff making a report should not discuss the situation with anyone other than their supervisor, the vice president of advancement (or presidents), and other appropriate individuals designated by the University, if any, during the investigation of the matter. Likewise, a supervisor forwarding on a report should not further discuss the matter other than with appropriate personnel.

C. Good Faith Reporting

A staff member making a report must do so in good faith and have reasonable grounds for believing wrongful conduct is involved. Making allegations that are found to be malicious, reckless, grossly negligent, or purposefully false will be viewed as a serious offense and may result in discipline, up to and including termination.

D. Anonymous Reporting

Reports may be submitted anonymously by completing a comment card and can be found on the Northwest webpage. It is essential that anonymous reports contain as much specific information as possible to justify the commencement of an investigation. An investigation of unspecified wrongdoing or broad allegations will not be undertaken without reasonable and verifiable evidentiary support. In addition, since an investigation of an anonymous report will not include an interview with the reporter, it may be more difficult to evaluate the credibility of the allegations. Therefore, anonymous reports are often less likely to result in a full investigation and/or findings against the person alleged to have engaged in wrongful conduct.

III. Investigation

Following the receipt of a report, the vice president of advancement (or presidents) will do a preliminary assessment and determine whether an investigation should be commenced based on the facts provided. If an investigation is deemed appropriate, an internal and/or external investigator(s) will be designated. The scope and timing of the investigation will vary by circumstance, but an investigation will generally involve a review of relevant documents and other records (e.g., physical documents, emails, browser histories, voicemails, text messages, etc.) and interviews with individuals who may have knowledge of the situation.

If through the course of an investigation the Foundation or University determines that wrongful conduct has occurred, a written finding will be presented to the appropriate senior administrator(s) for appropriate action. Action will be based on the nature of the violation and the position(s) held by the implicated employee(s) and will follow established disciplinary guidelines. Actions will be consistent with all applicable University and Foundation policies.

A person making a report of wrongful conduct will usually be informed of the disposition of the report and the findings of any investigation, although there may be overriding reasons, such as legal limitations, not to do so. Additionally, any action taken against an employee as a consequence of the findings of an investigation may be personal and confidential, in which case the reporter will not be informed of such consequences.

IV. Confidentiality

Reports of suspected wrongful conduct, and investigations of such reports, shall be kept confidential to the extent possible. However, consistent with the need to conduct an adequate investigation, the University cannot guarantee complete confidentiality. Disclosure of information related to a report and investigation by University personnel to other uninvolved individuals will be viewed as a serious offense and may result in discipline, up to and including termination.

V. No Retaliation

The University will use its best efforts to ensure that an employee who, in good faith, reports actual or suspected wrongful conduct does not suffer an adverse employment action or other retaliation as a result of making such report. An employee who retaliates against another employee for making a good faith report of wrongful conduct, or for participating in the investigation of such, is subject to discipline, up to and including termination.

Adopted by the Northwest Foundation Board of Directors:

President

Date

10/27/16