

## Policy on Reporting Violations of Law, Regulations, or University Policy and Procedure

<b>Policy Title</b>	<b>Policy on Reporting Violations of Law, Regulations, or University Policy and Procedure</b>
<b>Policy #</b>	01.013.1
<b>Policy Owner</b>	Director of Enterprise Compliance
<b>Contact Information</b>	Questions regarding this policy should be directed to the Director of Enterprise Compliance at (401) 874-4000
<b>Approved By</b>	The University of Rhode Island Board of Trustees
<b>Effective Date</b>	November 4, 2022
<b>Next Review Date</b>	No later than September 30, 2027
<b>Who Needs to Know About this Policy</b>	All faculty, staff, and students of the University as well as University Affiliates
<b>Definitions</b>	<p><b>Employee.</b> Any person employed by the University, including faculty, staff, and students regardless of the source of funds within the University.</p> <p><b>University Affiliate.</b> Any individual who is not a faculty member, staff, or student who otherwise has a formal relationship with the University, including but not limited to visiting scholars, visiting students, research fellows, professional program participants, club sports coaches, and volunteers as well as employees and associates of the URI Foundation and Alumni Engagement, URI Research Foundation, and members of the University of Rhode Island Board of Trustees. Vendors and contractors are not considered University Affiliates, except for those with an ongoing presence on the University campus as regular operations support staff.</p>
<b>Statutes, Regulations, and Policies Governing or Necessitating This Policy</b>	<p>RIGL § 28-50 (The Rhode Island Whistleblowers' Protection Act)</p> <p>RIGL § 9-1.1 (The State False Claim Act)</p>
<b>Reason for Policy/Purpose</b>	To encourage and enable Employees, students, and University Affiliates who have knowledge of violations of law, regulations, or University policy and procedure at the University of Rhode Island, to raise them with the University and to protect individuals who make good faith reports from retaliation in any form.
<b>Forms Related to this Policy</b>	<a href="https://web.uri.edu/enterprise-compliance/ethics-hotline">https://web.uri.edu/enterprise-compliance/ethics-hotline</a>

## Policy Statement

The University of Rhode Island (also, “University”) is committed to fostering an environment of high ethical standards and compliance with all applicable federal and state laws and regulations as well as University policies and procedures. The University is dedicated to achieving excellence and endorses the core values of diversity, mutual respect, integrity, collegiality, academic freedom, stewardship, service, safety, and student success.

This policy encourages all University Employees, students, and Affiliates, including members of the University of Rhode Island Board of Trustees, to report, in good-faith, serious concerns about violations of any federal or state law or regulation, or any University policy or procedure, that occurs in connection with the University’s activities or operations. Examples of these violations include but are not limited to: misappropriation or misuse of University resources; misuse of government funding; fraud, forgery, or the alteration of documents; fraudulent financial reporting; bribery.

This policy is intended to complement and supplement existing University policies and procedures. This policy does not provide an avenue for expressing general workplace complaints and sentiments; addressing problems with colleagues, co-workers, or supervisors; or reporting alleged employment discrimination, sexual misconduct, or any other form of unlawful harassment. General workplace complaints and sentiments should be directed to a supervisor/manager or the Office of Human Resource Administration. Additionally, all complaints of alleged discrimination, sexual misconduct, research misconduct, and student misconduct shall be handled under the terms of existing University policies covering those allegations and their associated procedures.

### 1. Reporting

Reports of violations of law, regulations, or University policy and procedure covered under this policy are assumed to be made in good faith whereby the person reporting has reasonable grounds for believing that the information disclosed may indicate a violation of a law, regulation, or University policy or procedure. Individuals making malicious or knowingly false allegations may face disciplinary action by the University.

Suspected noncompliance or violations covered under this policy should be reported to any of the following:

- The Employee’s immediate manager or supervisor
- Enterprise Compliance Office – [enterprisecompliance@etal.uri.edu](mailto:enterprisecompliance@etal.uri.edu); (401) 874-4000
- Office of General Counsel – [OGC\\_Service\\_Request@etal.uri.edu](mailto:OGC_Service_Request@etal.uri.edu); (401) 874-4486
- Assistant Vice President, Human Resources – (401) 874-5270
- URI Police Department (401) 874-7107
- Ethics Hotline – <https://web.uri.edu/enterprise-compliance/ethics-hotline>; (855) 222-0764

Reports specific to the Board of Trustees or members of the Board of Trustees should be directed to the Office of General Counsel.

### 2. Whistleblower Protection

Certain classes of individuals, including at will employees, contract employees, applicants, prospective employees, and independent contractors, have protection under the Rhode Island Whistleblowers’ Protection Act (RIGL § 28-50). If an individual entitled to such protection makes a report of a violation of a federal or state law or regulation that the individual knows or reasonably believes has occurred or is about to occur, the reporting individual is protected under RIGL § 28-50 and may not be discharged, threatened, or otherwise discriminated against because of such report. Nothing in this policy is intended to limit or otherwise affect the rights of individuals protected by the Rhode Island Whistleblowers’ Protection Act and individuals should refer to RIGL § 28-50 for the full scope of activities protected under that law.

### 3. Ethics Hotline

If the reporting individual desires anonymity, they may report to the Ethics Hotline (<https://web.uri.edu/enterprise-compliance/ethics-hotline>) since anonymous reports can be accepted via this resource. The Ethics Hotline is designed to receive reports regarding compliance and ethical issues, as well as other concerns related to accounting and financial controls, athletics, human resources, information technologies, research, and risk and safety matters. Examples of reportable issues include fraud, misuse of University resources or information, violation of safety rules and environmental laws, conflicts of interest, NCAA violations, and research grant misconduct. Reports should contain sufficient information to substantiate the concern and allow an appropriate investigation to begin promptly. Facts will be made available only to those who need to know in order to address the issues reported. While the Ethics Hotline allows a reporting individual to submit reports anonymously, the University encourages individuals who use the Ethics Hotline to self-identify since there may be difficulty in addressing an anonymous report.

### 4. Investigations

All individuals identified in the "Reporting" section above who receive a report of violations of law, regulations, or University policy and procedure must notify the Enterprise Compliance Office ([enterprisecompliance@etal.uri.edu](mailto:enterprisecompliance@etal.uri.edu)) within five (5) business days for tracking and monitoring purposes. The University shall, within a reasonable timeframe not to exceed sixty (60) days, take appropriate action to determine the validity of the report and investigate in accordance with the Procedures accompanying this policy.

University officials involved in investigations must handle complaints and allegations arising under this policy and the investigation and communications surrounding these complaints and allegations with sensitivity and discretion. Sufficient care must be taken to avoid incorrect accusations, alerting suspected individuals that an investigation is under way, violating any person's right to due process, or making statements that could lead to claims of false accusations or other civil rights violations.

At the discretion of the University and subject to legal and other constraints, the reporting individual may receive information about the outcome of an investigation.

Individuals reporting violations of law, regulations, or University policy and procedure should not attempt to investigate the matter independently, as doing so may compromise the integrity of an official investigation.

### 5. Confidentiality

The University is committed to protecting individuals and maintains a confidential, and if desired, anonymous, process for individuals to make reports through the Ethics Hotline. To the extent possible, within the limitations of law and policy and the need to conduct a complete investigation, confidentiality of individuals reporting will be maintained. Individuals reporting should be cautioned that their identity may become known for reasons outside of the control of the investigators or University officials. Should the reporting individual self-disclose their identity to a third party, the University will no longer be obligated to maintain confidentiality.

Unless required to be disclosed by law, records and personally identifying information reported under this policy shall be confidential and disclosed only to University officials and individuals with a legitimate need to know in order to appropriately address any issues revealed thereby.

## 6. Retaliation Prohibited

Retaliation against any individual who reports violations of law, regulations, or University policy and procedure or is involved in an investigation of such activity is prohibited, and shall be treated as a separate violation under this policy. Furthermore, no member of the University community shall retaliate, intimidate, threaten, coerce, or otherwise discriminate against any individual for exercising their rights or responsibilities under any provision of law or the University's policies or procedures. Any individual who reasonably believes that they have been subjected to retaliation may file a written complaint with the University's Office of Equal Opportunity.

A reporting individual's right to protection from retaliation does not extend to immunity for any complicity in matters that are subject of the disclosure or an ensuing investigation. The University also has the right to act upon the intentional filing, orally or in writing, of a false report.

## Exceptions

None

## Policy Review and Revisions

(Versions earlier than the first policy number may be paper only)

Policy #	Effective Date	Reason for Change	Changes to Policy
01.012.1	November 4, 2022	n/a	n/a