



## Whistleblower Policy

A whistleblower is defined as an employee of Colorado Christian University who reports an activity that is generally considered to be illegal, dishonest, or unethical. The whistleblower is not responsible for investigating the activity or for determining fault or corrective measures. However, you may report these type of activities to the Assistant Vice President of Human Resources, a Cabinet member, the President, or a member of the Board of Trustees.

Examples of these activities are violations of federal, state, or local laws; billing for services not performed or for goods not delivered; severe conflict of interest; poor financial practices; and other fraudulent financial reporting or activities.

If an employee has knowledge of or a concern within these guidelines, the employee may contact the Assistant Vice President of Human Resources, a Cabinet member, the President, or a member of the Board of Trustees. Timely reporting of any allegations are critical to resolution and to prevent distorting the review of facts through a fact-finding investigation.

Whistleblower protections are provided in two important areas: 1) confidentiality and 2) retaliation. Insofar as possible, the confidentiality of the whistleblower will be maintained. Identity may have to be disclosed to conduct a thorough investigation, to comply with the law, and/or to provide accused individuals their legal rights of defense. CCU will not retaliate against a whistleblower. This includes, but is not limited to, protection from retaliation in the form of an adverse employment action such as termination, compensation decreases, poor work assignments, or threats of physical harm, e.g., bullying or harassment.

- Any whistleblowers who believe they are being retaliated against must contact the Assistant Vice President of Human Resources immediately. The right of a whistleblower to protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated. Human Resources may be charged with investigating and coordinating corrective action or this may involve a third-party investigator from outside of CCU. In these situations, all parties are expected to cooperate with the investigation. Failing to cooperate with an investigation is in violation of this policy and corrective action may be taken to assist with the fact-finding investigation and its resolution of allegations under this policy