Whistleblower Policy

Document Number: RISK-0013 **Date Published(sys):** 10/2/2025

General Description

Policy Summary:

This Policy governs the use of the Whistleblower Hotline report acts considered to be potentially illegal, fraudulent, dishonest, abuse of authority/abusive behavior and/or of a similar nature. This policy also strictly prohibits retaliation against an employee or student of the University (referred to here as a "Whistleblower") who reports an activity that the Whistleblower reasonably believes to be illegal, fraudulent, dishonest or otherwise warranting reporting on the hotline.

Purpose:

This policy promotes transparency and accountability within the University by encouraging the reporting of misconduct while protecting whistleblowers from retaliation.

Scope:

This policy applies to faculty, staff, students who are also employees, and third parties within the University's control (such as contractors, volunteers, visitors, etc.).

Exceptions:

In alignment with Texas Senate Bill 212 (SB 212), Trinity University employees are required to report any known incident of sexual misconduct (sexual harassment, sexual assault, sexual coercion, and sexual exploitation), domestic violence, dating violence and stalking directly and non-anonymously. Anonymous reports are not permitted for allegations involving sexual misconduct or harassment, ensuring accountability and compliance with state law.

Responsible Department:

Risk Management

Policy Content

Reporting

All University community members are responsible for reporting fraudulent, dishonest, or illegal conduct involving University employees or resources. The University's official reporting channel for such matters, the Campus Conduct Hotline, is provided and managed by the University's insurance provider to ensure confidentiality. You can access the Campus Conduct Hotline's confidential phone number (866-943-5787) or confidential website at www.lighthouse-services.com/CCH2562. A confidential code is provided to the person reporting the incident, allowing the caller to track the progress and resolution of the matter throughout the investigation process.

Reports submitted to the hotline are forwarded to the Office of the General Counsel and the University Risk Management Office, which co-manages the hotline. After an initial complaint review, the co-managers determine the appropriate institutional division responsible for further review and resolution. Once identified, the co-managers send the complaint to the relevant Vice President for handling.

Investigative Procedure

Assignment of Investigator for Complaints Against Parties excluding the President and Members of the Executive Leadership Team:

The Vice President will assign a divisional investigator to conduct an inquiry or, if necessary, a full investigation. If the complaint involves senior leadership or presents potential conflicts of interest, the General Counsel may assign an external investigator to ensure impartiality.

Complaints Against the President's Executive Team:

Complaints involving the President's Executive Team members, i.e., Vice Presidents, General Counsel, or Chief of Staff, will follow the University's standard operating procedures. These procedures will ensure an impartial and thorough inquiry or investigation, with appropriate actions taken if a violation is found.

Complaints Against the President:

If a complaint is made against the President, the Office of General Counsel will oversee the investigation. The final report of the investigation will be provided to the Chair of the Board of Trustees' Audit Committee, which will take the necessary actions in response to the findings.

Conclusion of Investigation:

The assigned investigator will determine whether a violation has occurred once the inquiry or investigation is complete. If a violation is found, the University will appropriately address the issue per applicable policies and procedures.

Reporter Communication:

Throughout the process, the hotline co-managers will provide appropriate updates to the individual who reported the complaint regarding the status and progress of the investigation through the online reporting system.

Escalation of Significant Matters:

In consultation with relevant administrative officials not involved in the reported case, the General Counsel will assess whether the matter warrants immediate reporting to the Chair of the Audit Committee of the Board of Trustees.

Annual Reporting:

To ensure oversight and accountability, all issues reported through the hotline, including a summary of actions taken, will be presented to the Audit Committee in an annual summary report.

Whistleblower Protection

University employees may not retaliate against a Whistleblower with the intent or effect of adversely affecting the terms or conditions of employment or enrollment.

If the Whistleblower has made a confidential report, the University will exercise reasonable care to keep the Whistleblower's identity and the report confidential unless:

(1) The whistleblower agrees to the disclosure;
(2) disclosure is necessary to allow University or law enforcement officials to investigate or respond effectively to the report;
(3) disclosure is required by law; or
(4) the person(s) accused of violations by the Whistleblower are entitled to the information as a matter of institutional due process in disciplinary proceedings.

Whistleblowers who reasonably believe that a University employee or student has retaliated against them may file a written complaint with the General Counsel, with a copy to the Vice President of People, Culture, and Community. If retaliation is substantiated, the retaliating

employee(s) are subject to appropriate disciplinary actions or remedies, up to and including dismissal. The prohibition against retaliation is not intended to prohibit managers or supervisors from exercising legitimate supervisory responsibilities in the usual scope of their duties.

Related Documents

Related Content:

Campus Conduct Confidential Website

Revision Management

Revision History Log:

Revision #:	Date:	Recorded By:
v2.2	12/3/2024 10:43 AM	Pamela Mota
v2.1	11/7/2024 8:24 AM	Pamela Mota
v2.0	9/30/2024 2:12 PM	Pamela Mota
v1.0	8/9/2019 3:38 PM	Jennifer Gilmore Adamo

Vice President Approval:

Name:	Title:
Mark Detterick	Vice President for Finance and Administration