

Concordia University, St. Paul has a responsibility to conduct its affairs ethically and in compliance with the law. If you suspect that the University or a particular CSP employee is engaged in improper governmental activities, you should know that CSP has policies that can show you how to "blow the whistle" and can protect you from retaliation if the need arises. [Whistleblower Policy and Procedure](#)

### ***What Can Be Reported?***

Any activity undertaken by the University or by an employee of the University that is undertaken in the performance of the employee's official duties, whether or not that action is within the scope of his or her employment, and that (1) is in violation of any state or federal law or regulation, including, but not limited to, corruption, malfeasance, bribery, theft of University property, fraudulent claims, fraud, coercion, conversion, malicious prosecution, misuse of University property and facilities, or willful omission to perform duty, or (2) is economically wasteful, or involves gross misconduct, gross incompetence, or gross inefficiency. In general, these actions are referred to as "improper governmental activities."

### ***Who Can Report?***

Any person (staff, faculty, student, general public) may report allegations of suspected improper governmental activities (as defined above)

### ***Where To File the Report?***

Reports may be phoned in confidentially to 855.358.3903.

### ***What Information Should the Report Include?***

Reports are encouraged to be made in writing to assure a clear understanding of the issues raised, however they may be made orally. Such reports should be factual rather than speculative or conclusory, and contain as much specific information as possible to allow for proper assessment of the nature, extent and urgency of preliminary investigative procedures.

Providing the following information regarding each allegation is most useful; however, answers to all these questions are not required to file a whistleblower report.

**WHAT?** What is the alleged improper activity? Do any documents exist that would provide evidence of the improper activities? Where are the documents located? Who controls them?

**WHO?** Who are the subjects of the allegation? Who else do you believe is involved -- complete names and work location? If you believe an organization is involved, who are the contact people? Do the subjects of the complaint know about this report? Can anyone else corroborate the improper activities being reported and how can they be contacted?

**WHERE?** Where is the alleged improper activity occurring?

**WHEN?** When did the alleged improper activity occur? Is it ongoing? How frequently has it occurred?

**HOW?** How did you become aware of the alleged improper activity? How did the subject carry out the activity?

In providing information, the whistleblower is not to conduct any investigative procedures or obtain evidence for which he or she does not have a right of access. Doing so may constitute a violation of law or University policy.

### ***Anonymous Reports.***

Whistleblower reports may be made anonymously. Anonymous whistleblowers must provide sufficient corroborating evidence to justify the commencement of an investigation. Because of the inability of

investigators to interview anonymous whistleblowers, it may be more difficult to evaluate the allegations and, therefore, less likely to cause an investigation to be initiated.

***Will I be informed of the outcome of my report?***

Whistleblowers generally have the right to be informed of the disposition of a disclosure and the findings of any investigation, although there might be overriding legal or public interest reasons not to do so. However, any action taken against an employee as a consequence of the findings of the investigation may be personal and confidential, in which case, it cannot be disclosed.

***Why might my allegations not be investigated?***

Sometimes employees blow the whistle about things that are not improper governmental activities, but are personnel, labor relations or management issues. The preliminary investigation assesses whether or not there appears to be an improper governmental activity. However, just because an investigation is not launched does not mean that the complaint will not be looked into by management. Your report might be referred to Human Resources or some other office for review and appropriate follow-up.