



Fraud Hotline Policy

(Effective March 30, 2007)

Purpose

The University of the Pacific's mission is to provide a superior, student-centered learning experience integrating liberal arts and professional education. This mission is advanced where all members and stakeholders act responsibly in conducting business ethically and complying with federal, state, and local laws.

This Fraud Hotline Policy describes a non-retaliatory resource for University stakeholders to report perceived unethical and/or illegal business activity. Fraud generally involves a willful or deliberate act, expression, omission or concealment with the intent of obtaining an unauthorized benefit, such as money or property, by deception or other unethical means.

The hotline should not be used as an alternative to existing university reporting mechanisms for matters such as faculty, staff and student-employee employment-related complaints; sexual and other unlawful harassment; student academic and residential life problems; and emergency matters. Emergency matters such as health and safety hazards, crime problems and other emergencies are to be addressed in other, existing University channels including but not limited to contacting 911 in a health emergency.

Reporting

All members of the university community should report business conduct at the university which they in good faith believe is unethical or illegal. They should use the hotline if there are not ordinary mechanisms to report such matters or in good faith they do not believe that a non-anonymous report is appropriate.

A non-exhaustive list of unethical business might include:

- Forgery or unauthorized alteration of University documents, including checks, bank drafts, computer files, or any other financial document;
- Misappropriation or theft of funds, securities, supplies, or other assets;
- Impropriety in handling or reporting of money or financial transactions;
- Purposely reporting inaccurate financial information;
- Authorizing or receiving compensation for goods not received or services not performed;
- Accepting or seeking anything of material value from contractors, vendors, or persons providing services/material to the University that is not consistent with university policy;
- Destruction, removal, or inappropriate use of University records, furniture, fixtures, and equipment; and/or Unethical bidding practices.

Hotline reports should include as much specific information as possible to allow for proper assessment of the nature, extent, and urgency of the incident. Individuals are encouraged to first report to their supervisor or to another appropriate university official. When these or other normal channels are not successful in addressing an issue or where anonymity is desired because in good faith the reporting person does not believe that a non-anonymous report will be effective, the hotline is available to bring the concern to the University's attention.

Only good faith reports should be made. "Good faith" means "sincere" without any improper motive and with a factual basis for believing that illegal or unethical activity has occurred or will soon occur. Reports without good faith should not be made and could subject the reporting person to institutional disciplinary action.

Investigation of Reports

The Office of Internal Audit is charged by the Board of Regents - Audit Committee to review every report to the hotline. If, in the judgment of the Office of Internal Audit, a the report, if true, would constitutes unethical or illegal business activity, and specific information or corroborating evidence is contained in the report or may be obtained, an investigation will generally be conducted. Other departments may become involved in the investigation based on their areas of oversight responsibility or expertise. Efforts will be made to perform assessments discreetly.

Non-Retaliation

No faculty, administrator, staff, student, or other university stakeholder may be subject to interference, coercion or reprisal for making a fraud hotline report in good faith. The University will not retaliate against any person making a good faith report of an unethical or illegal act, and will not knowingly permit retaliation by any manager, supervisor, faculty, or administrator.

Reporting Protection

The University will make efforts to take prompt and effective action in response to a report submitted to the Hotline. The University cannot guarantee confidentiality, but generally, the person's identity will not be disclosed unless (1) the person agrees to be identified; or (2) identification is warranted in the judgment of a University officer.

Note: The University cannot and does not guarantee to anyone that a report by them or by anyone else will result in any specific action, or in any action that the person believes would be prompt and/or effective.