



**Policy Chapter:** Chapter 4 Administration

**Policy Number and Title:** 04.007 Reporting Suspected Wrongdoing

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**I. Policy Statement**

The University of North Texas is committed to maintaining the highest ethical standards that encourage all UNT employees, independent contractors, students, volunteers, and agents (Community Members) to conduct themselves lawfully, honestly, and with integrity. Established controls and policies help to detect irregular activities; however, the university relies on its community members to make good faith reports of wrongdoing, such as suspected fraud and willful violations of policy, procedures, and laws. The purpose of this policy is to inform employees, volunteers, independent contractors, and agents of their responsibility to make good faith reports of wrongdoing; of their role in investigations; of possible disciplinary actions for violations of this policy; and the strict prohibition of retaliation against those making good faith reports.

**II. Application of Policy**

All University Community Members

**III. Policy Definitions**

**A. Agent**

“Agent,” in this policy, means any individual, including a director, an officer, an employee, or an independent contractor, authorized to act on behalf of UNT.

**B. Independent Contractor**

“Independent Contractor,” in this policy, is any non-employee person or entity that performs work for or on behalf of UNT in exchange for compensation or other consideration from UNT.

**C. Employee**

“Employee,” in this policy, an individual who is employed full-time, part-time, in a temporary status, or who is required to be a student as a condition of employment.

**D. Fraud**

“Fraud,” in this policy, means any behavior that involves intentional misrepresentation or dishonesty, knowingly stating a false claim, or other intentional or willful dishonesty or misrepresentation, known to be false or otherwise unlawful or improper, in order to receive some unapproved benefit.

**E. Good Faith Report**

“Good faith report,” means a reasonable belief that conduct violates law, Regents Rule, System Regulation or System Administration policy based on the reporting individual’s training and experience.

**F. Retaliation**

“Retaliation,” in this policy, means any action, treatment, or condition likely to dissuade a

reasonable person from making or causing a good faith report to be made, or from participating in an investigation of suspected wrongdoing, including but not limited to an action that negatively affects an individual's enrollment or business relationship, or an employee's compensation, promotion, transfer, work assignment, or performance evaluation.

**G. Student**

"Student," in this policy, means an individual who has applied for admission or readmission to UNT, who is registered or enrolled in one or more courses for credit at UNT, or who currently is not enrolled but has a continuing academic relationship with UNT.

**H. University Management**

"University Management" or "Manager," in this policy, is any administrator, account holder, director, supervisor, or other individual who manages or supervises funds or other resources, including human resources.

**I. Volunteer**

"Volunteer," in this policy, means an authorized person who provides services for or on behalf of UNT who does not receive compensation or other consideration in excess of reimbursement for expenses.

**J. Wrongdoing**

"Wrongdoing," in this policy, means fraud, waste, abuse, illegal activity, conflict of interest, financial misstatement, accounting irregularity, or violation of federal or state law, Regents Rule, System Regulation, or institutional policy.

**IV. Policy Responsibilities**

**A. Reporting Obligations**

1. All Employees, Volunteers, Independent Contractors, and Agents
  - a. UNT is committed to fostering a culture of integrity and ethical behavior. To that end, all employees, volunteers, independent contractors, and agents are expected to act with honesty and integrity in their day-to-day activities and to safeguard any university resources for which they are responsible.
  - b. When suspected incidents or practice of wrongdoing are observed or made known, the incident or practice must be reported to the appropriate party, as specified below under Section C.
  - c. Individuals may not investigate the incident or practice, confront the alleged violator(s), nor impede the investigation in anyway.
2. Managers
  - a. Each manager is responsible for ensuring that financial and other internal controls sufficient to detect wrongdoing are present in their areas of responsibility. Each

manager must be familiar with the types of improprieties that might occur in their area and be alert for any indication that wrongdoing is or was in existence in their area.

- b. If management determines a suspected activity involves wrongdoing, the individual must make a good faith report to the appropriate party, as specified below under Section C.
- c. After turning the matter over to appropriate authorities, management may not attempt to conduct individual investigations, interviews, or interrogations.
- d. During an ongoing investigation, management must consult with the Office of General Counsel, Human Resources, and any office involved in the investigation before taking any disciplinary action, including termination, against either the individual under investigation or an individual who has provided information relevant to the investigation.

### ***B. Reporting Encouraged***

#### **1. Students and Other Individuals**

Students and other individuals are strongly encouraged to report suspected wrongdoing of any kind.

### ***C. Ways to Report***

In addition to the methods listed below, the UIC office and the Dean of Students office will publish on their websites contact information for receiving reports of suspected wrongdoing and retaliation.

#### **1. Criminal Conduct or Matters of Imminent Harm**

Matters which pose a risk of serious imminent harm to a person or property should be reported to emergency services without delay. If an individual suspects there is imminent risk of harm to a person or property, they should call 911 immediately.

All matters of criminal conduct should be reported to the [UNT Police Department](#) or local law enforcement authorities. They may be reached at: (940) 565-3000.

#### **2. Other Suspected Wrongdoing**

##### ***a. Supervisor***

Employees are encouraged to report all suspected wrongdoing to the individual's supervisor prior to reporting to the proper university management official.

##### ***b. Higher Level of Management, UIC, and Audit***

If an individual believes their supervisor may be involved in the wrongdoing, the suspect wrongdoing should be reported directly to the next higher level of management, University Integrity and Compliance (UIC) office, or UNT System Internal Audit.

c. *Appropriate Office*

An individual may make a report of suspected wrongdoing to any appropriate university or UNT System office. The appropriate office may include the UNT Office of Inclusion, Diversity, Equity, and Access; the Dean of Students; Human Resources; the UIC office; and the UNT System Internal Auditor.

d. *Appropriate Agency*

Reporting suspected wrongdoing under this policy is in addition to and does not replace, change, or modify reporting requirements under federal or state law. An individual may make a good faith report to the appropriate federal or state agency.

Individuals may also report a possible false claims act action directly to the Department of Justice or the Health and Human Services Office of Inspector General Hotline (1-800-HHSTIPS) or to the Texas State Auditor's Office via their [fraud reporting website](#) or Fraud Hotline (1-800-TX-AUDIT).

e. *President's Office*

Reports regarding suspected wrongdoing involving a member of the UIC office should be made to the Office of the President.

3. Anonymous Reporting

Individuals may also report suspected instances of wrongdoing anonymously through the Trust Line. The Trust Line is a third-party compliance line that collects information anonymously and is available 24 hours a day and 7 days a week. Information submitted through the Trust Line will be kept confidential to the extent legally possible. To file a report:

- a. call the toll-free number: (877) 606-9187, or
- b. complete the web form at the: [UNT Trust Line Website](#).

**D. Prohibition of Retaliation**

1. Zero Tolerance of Retaliation

The university prohibits and does not tolerate retaliation against any individual who makes a good faith report of wrongdoing or is a witness or participant in the report or investigation of such suspected conduct. Engaging in retaliation may result in disciplinary action, including dismissal from the university.

2. Consequences of False Reporting

An individual who files a complaint that the individual knows or believes to be false is not protected by this provision and may be subject to disciplinary action, up to and including dismissal from the university.

3. Reporting Retaliation

The University encourages any person who believes he or she has been subject to

retaliation, observes, or is otherwise aware of an incident of retaliation in violation of this policy, to report the incident promptly to the UIC office.

***E. Determination of Good Faith Report & Investigation Commencement***

University officials who receive a report of suspected wrongdoing must determine whether it is a good faith report, and if it is, the appropriate institutional unit will investigate the matter in accordance with legal requirements and the requirements of any applicable UNT policy.

***F. Risk of Significant Liability or Reputational Harm***

1. The President, Chief Integrity Officer, Vice Chancellor and General Counsel, and Chief Internal Auditor must be informed of suspected wrongdoing that may pose a risk of significant liability or reputational harm to the university or of other reports or matters that may be a significant compliance concern.
2. The Board of Regents must be informed of suspected wrongdoing that poses a risk of significant liability or reputational harm to the university, or of other reports or matters that are a significant compliance concern in the judgment of the President or UNT Compliance Officer. In determining whether to inform the Board, officials should consult the Chancellor, Vice Chancellor and General Counsel or Chief Internal Auditor as appropriate.

***G. Confidentiality***

Reports of suspected fraudulent activity received by University Integrity and Compliance will remain confidential to the extent allowed by law.

***H. Cooperation with Investigation of Suspected Wrongdoing***

Individuals are expected to be truthful and cooperate with all investigative authorities, including law enforcement agencies, in the detection, reporting, and investigation of suspected wrongdoing.

A person who makes a report of suspected wrongdoing will not be involved in the investigation or be advised of the status or disposition of a matter unless required by law.

***I. Disciplinary Action***

Anyone found to have violated this policy will be subject to disciplinary action, including termination. When necessary, the good faith report of wrongdoing and any related investigation may be forwarded to the appropriate authorities for criminal prosecution.

**V. References and Cross-References**

[UNT Systems Board of Regents Rule 04.1100, Reporting Suspected Wrongdoing](#)

[UNT System Regulation 08.17000](#)

[UNT Policy 04.006, Responsibilities and Rights of Employees under the UNT Compliance Program](#)

[UNT Policy 04.010, Reporting Suspected Abuse and Neglect of Children, and Elderly or Disabled Individuals](#)

[UNT Policy 05.015, Ethics](#)

[UNT Policy 05.033, Performance Counseling and Discipline](#)

[UNT Policy 10.005, Accountholder Responsibilities](#)

[UNT Policy 16.004, Prohibition of Discrimination, Harassment, and Retaliation](#)

[UNT Policy 16.005, Prohibition Against Sexual Misconduct and Retaliation](#)

[UNT Trust Line](#)

**VI. Revision History**

Policy Contact:	VP & Chief Integrity Officer
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