WHAT IS THE UNIVERSITY OF THE VIRGIN ISLANDS HOTLINE?
The University Hotline is a mechanism by which members of the University community or any other individual can bring forward a good-faith concern regarding an allegation of suspected wrongdoing, without fear of retaliation, and to have that concern addressed by an independent reviewer.

WHY DID THE UNIVERSITY IMPLEMENT A HOTLINE?
The University implemented a Hotline to provide a proactive deterrent to fraud, waste, and abuse and to demonstrate its commitment to ensuring that all the University’s transactions and interactions are transparent. The University’s Board of Trustees has a fiduciary responsibility to protect the University’s resources and to maintain high standards of integrity in the workplace. Concurrent with the Board of Trustees’ fiduciary responsibility, the President has enumerated seven management values, including a management value on uncompromised integrity, to support a workplace that is both positive and productive. The Hotline allows members of the University community and any other individual to bring forward good-faith concerns and assist the Board of Trustees and the President with maintaining high standards of ethics and integrity in the workplace. The Hotline encourages members of the University community and any other individual to think about and address ethical issues that arise in the workplace and it allows members of the University community and any other individual to step up and do the right thing.

WHAT IS FRAUD, WASTE, AND ABUSE?
Fraud is an intentional, false representation or concealment of a material fact for the purpose of inducing another to act upon it to his or her detriment or injury. Examples of fraud include, but are not limited to, falsifying payroll information, soliciting a bribe or kickback from a University vendor or contractor, and misappropriating University money, equipment, supplies, and/or other materials.

Waste is the intentional or unintentional, thoughtless or careless expenditure, consumption, mismanagement, use, or squandering of University resources. Waste also includes incurring unnecessary costs because of inefficient or ineffective practices, systems, or controls. Examples of waste include, but are not limited to, the spending of University funds to purchase unnecessary supplies and equipment or the failure to reuse or recycle major resources or reduce waste generation.

Abuse is the intentional destruction, diversion, manipulation, misapplication, maltreatment, or misuse of University resources, including the extravagant or excessive use as to abuse one's position or authority. Abuse can occur in financial or non-financial settings. Examples of abuse include, but are not limited to, creating unnecessary overtime, requesting that a subordinate perform personal errands for a supervisor or manager, misusing your official University position for personal financial gain, or making travel choices that are contrary to existing University Travel policy or are extravagant or unnecessarily expensive.

WHAT KINDS OF CONCERNS SHOULD I REPORT?
You have an obligation to report any situation in the workplace or University environment which you believe is contrary to law, regulation, government contract, grant requirement, or University policy. Examples of typical Hotline calls include:

- Lack of compliance with a Federal grant requirement
- Theft of University assets
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- Inappropriate relationships between a manager and his/her subordinate
- Inappropriate relationships between a University employee and a vendor or contractor
- Gifts from a vendor or contractor
- Harassment, intimidation, retaliation, or discrimination against an employee or student
- Falsification of time sheets or other University records
- Research misconduct
- Information security breach
- Misuse of Sponsored Research funds
- Bribes or kickbacks
- Purchase of personal items with University funds
- Improper financial reporting
- Questionable accounting practices

WHY CAN’T I JUST REPORT OBSERVED VIOLATIONS TO MY SUPERVISOR OR OTHER UNIVERSITY MANAGER?
You can. The Office of Internal Audit encourages you to report suspected violations through your management chain of command. But, if you have tried unsuccessfully to work your concern through a manager or you are not comfortable reporting a matter to your manager, you have the option of using the Hotline. In so doing, you also have the option of filing a concern anonymously or confidentially.

HOW DO I REMAIN ANONYMOUS?
You can remain anonymous by calling into the designated Hotline number; this number has been established without caller identification. You can also send an anonymous letter to the Office of Internal Audit or drop an anonymous letter into the lockbox outside the Office of Internal Audit. If you call into the designated Hotline number, you will be provided with a case number, so that you can follow up on the status of the matter that you brought forward. Similarly, after providing an anonymous letter, you can call the designated Hotline number and request a case number and the status of your matter. However, in order for an anonymous allegation to be reviewed, you must provide sufficient and specific evidence to justify the initiation of an investigation.

HOW DO I REMAIN CONFIDENTIAL?
You can make a confidential report by identifying yourself to the Internal Auditor and requesting confidentiality at the time you bring forward your concern. The Office of Internal Audit will honor and protect your request for confidentiality to the extent permitted under the law. However, if the matter you bring forward, for example, results in a criminal investigation and the case file is turned over to a law enforcement agency, then your identity, through a subpoena process, may become known to the law enforcement agency and may be used, as necessary, by the law enforcement agency to fully pursue the matter that you brought forward. Similarly, if you bring forward a harassment claim against a manager, for example, the only way to review that allegation is to use your name and your specific circumstance. In this instance, your request for confidentiality cannot be honored.

WHAT ARE MY RESPONSIBILITIES IN BRINGING FORWARD A CONCERN?
You have a responsibility to make a good-faith report. Those providing good-faith reports will be afforded “whistleblower” protection by the University. In this regard, the University will uphold a zero retaliation measure for any and all employees who bring forward good-faith concerns. However, an
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employee who uses the Hotline to intentionally harm or impugn the integrity of an employee, vendor, contractor or any other individual or company conducting business with the University will be subject to disciplinary action up to and including termination of employment.

An employee who brings forward a good-faith allegation of wrongdoing must not:
- Contact the suspected individual in an effort to determine facts or demand restitution, or
- Discuss the case, facts, suspicions, or allegations with anyone unless specifically asked to do so by the President, Legal Counsel, or Internal Auditor.

WHAT HAPPENS WHEN I BRING FORWARD A GOOD FAITH REPORT?
When you call into the Hotline, directly call the Office of Internal Audit, or stop by the Office of Internal Audit, or if you send in a note or letter with your contact information, the Internal Auditor will conduct a professional, courteous, and thorough interview with you. The Internal Auditor will typically request the following information:
- Your name and University work location
- Any clarifying information regarding your allegation
- How you became aware of this matter
- Name(s) of the subject(s) and their work locations
- When the incident or matter occurred
- Where the incident or matter occurred
- How often the incident or matter has been occurring
- If you reported the incident or matter to your supervisor, manager, or outside party
- If there are any other witnesses
- Any other information you deem necessary to satisfactorily resolve this issue

The Internal Auditor will log your concern into the Hotline database and bring forward your concern to the President and Chairperson of the University’s Audit Committee, who will serve as the triage team for all Hotline concerns. Together, the President, Audit Committee Chairperson, and Internal Auditor will determine whether the allegation is sufficient to justify opening a formal review. The Office of Internal Audit has primary responsibility for the investigation of all suspected fraudulent acts, but other matters, such as harassment, intimidation, retaliation, and discrimination concerns will be forwarded to an appropriate University reviewing official for review and follow up by the Office of Internal Audit.

The Office of Internal Audit treats all information received as proprietary and confidential. As such, investigation results will only be shared with those with a legitimate need to know. In this regard, a concerned individual will be told whether the matter he/she brought forward was reviewed and whether or not the matter was substantiated. The concerned individual has neither a right nor a need to know the specific disciplinary action taken against the subject of a substantiated allegation.

HOW LONG WILL THE INVESTIGATION TAKE?
The length of review depends upon many factors, such as the complexity of the allegation, the number of involved subjects, the nature and extent of documents to gather and analyze, the testimonial evidence necessary to compile, the urgency of the matter, and the current case load of the Internal Auditor. The Office of Internal Audit recommends that you follow up on your concern within 5 to 7
business days of the initial intake of your concern; we’ll attempt to provide you with an estimated timeline. In general, reviews should take about 30-45 days to complete.

HOW ARE THE RESULTS OF AN INVESTIGATION REPORTED?
The Office of Internal will provide a summary of review results to all concerned individuals, except that the Office of Internal Audit is unable to provide such a summary to anonymous individuals. In addition, the Office of Internal Audit will provide a formal confidential report or memorandum to the President, Audit Committee Chairperson, Board of Trustees, and other University personnel on a need to know basis. Finally, the Office of Internal Audit will provide the University community with statistical data on the number and types of concerns received, the number of substantiated concerns, and the types of disciplinary action taken by the University in response to substantiated concerns.