

# St. Bonaventure University

## Whistleblower Policy

St. Bonaventure University has a responsibility for the stewardship of university resources and the public and private support that enables it to pursue its mission. The University is committed to compliance with the laws and regulations to which it is subject and to promulgating policies, procedures and internal controls to detect and prevent or deter improper activities. However, not even the best systems of internal controls can provide absolute safeguards against irregularities. Intentional and unintentional violations of laws, regulations, policies and procedures may occur and may constitute improper or unlawful activities. Persons wishing to report a violation or suspected violation may do so by the following methods:

- Personal or written report to your supervisor or Divisional Vice President
- Personal or written report, email or phone call to the Office of Human Resources
- Contact the University Ombuds Officer, ext. 2553, room 219A of Francis Hall or email [ombuds@sbu.edu](mailto:ombuds@sbu.edu)
- Contact J. Michael Shane, Esq., General Counsel, [jmshane@verizon.net](mailto:jmshane@verizon.net) or call 716-375-4213

Where practicable and permissible by law, university officers will protect the confidentiality of any person lodging a complaint. Depending on the nature of the complaint, complete confidentiality may not be able to be maintained. Anyone filing a report of improper activity must have a reasonable belief or the same and be acting in good faith. No individual who in good faith reports a violation or suspected violation shall suffer discrimination or retaliation or adverse employment or academic or educational consequence. Anyone who files a whistle blower report or complaint recklessly or with a willing disregard for the facts, so that the report or complaint is found to be lacking in “good faith” may be subject to disciplinary action.

Investigation of all claims of improper activity shall be initiated by the person to whom the claim is reported.