

## **Texas Woman's University Regent Policy**

**Regent Policy Name: Reporting Suspected Wrongdoing and Protection from Retaliation**

**Regent Policy Number: Regent Policy: B.20020**

### **POLICY STATEMENT**

Texas Woman's University ("TWU" or "University") is committed to the ethical stewardship of University resources in compliance with all applicable ethical, legal, and regulatory standards and requirements. The TWU Board of Regents ("Board") expects members of the TWU Community to conduct themselves ethically, honestly, and with integrity. The Board adopts this policy in its effort to encourage all members of the TWU Community to make good faith reports of suspected wrongdoing. The Board does not tolerate any form of retaliation against those making good faith reports of wrongdoing or those participating in an investigation pertaining to suspected wrongdoing.

### **APPLICABILITY**

This policy is applicable to TWU Students, Employees, Guests, and University Affiliates.

### **DEFINITIONS**

1. "Employee" means an individual who is employed part-time, full-time, or in a temporary capacity as faculty, staff, or who is required to be a student as a condition of employment, undergraduate or graduate.
2. "Good Faith Report" means a report made with reasonable belief that the conduct violates law or TWU policy based on the reporting individual's training and experience.
3. "Guests" means any individual not affiliated with TWU.
4. "Retaliation" means any action, treatment, or condition likely to dissuade a reasonable person from reporting or causing to report, or from participating in an investigation of suspected wrongdoing or a related proceeding, including an action that affects an individual's enrollment or business relationship, or an employee's compensation, promotion, transfer, work assignment, or performance evaluation.
5. "Student" means a person taking courses at TWU, a person who is not currently enrolled in courses but who has a continuing academic

relationship with TWU, or a person who has been admitted or readmitted to TWU.

6. "University Affiliate" means any individual associated with TWU in a capacity other than as a Student or Employee who has access to TWU resources through a contractual arrangement or other association. This includes the following individuals:
  - a. Contractors and Vendors: an individual, business, or governmental entity that has a fully executed contract to provide goods or services to TWU. This includes employees of contractors or vendors and independent contractors.
  - b. Employee of a Governmental Agency: an individual employed by a federal or Texas state agency.
  - c. Employee of a TWU-Affiliated Institution: an individual who works for organizations that are tightly aligned with the University.
  - d. Pre-Employment Individual: an individual who will be hired by the University and the hiring department has sponsored their access to TWU resources.
  - e. Other University Affiliate: any individual who does not fit into any other category and needs access to TWU resources.
7. "Wrongdoing" means fraud, waste, abuse, criminal conduct, or any other violation of federal or state law or TWU policy or procedure.

## **POLICY**

### **I. Reporting Suspected Wrongdoing**

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| Section 1 | Employee Reporting Requirements. Employees are required to promptly report in good faith suspected wrongdoing of any kind.  |
| Section 2 | Student and University Affiliates Reporting. Students and University Affiliates are strongly encouraged to promptly report in good faith suspected wrongdoing of any kind.  |
| Section 3 | Reporting. The reporting of suspected wrongdoing shall, consistent with TWU policy, be directed to the appropriate person or office. Reports may also be made to the Office of Compliance. Reports not within the Office of Compliance's jurisdiction will be redirected to the appropriate office. |

## **II. Addressing Reports of Suspected Wrongdoing**

- Section 1 Addressing Reports. TWU officials who receive a report of suspected wrongdoing shall determine whether an investigation is appropriate and resolve the report in accordance with both legal requirements and those of TWU policies.
- Section 2 Reporting Expectations. Individuals are expected to be truthful and cooperative in the investigation of suspected wrongdoing. Although cooperation is expected, an individual who makes a report in good faith is not entitled to be involved in any investigation, or to be advised of the status or disposition of a matter unless required by law.
- Section 3 Informing the Board. The Board shall be informed of wrongdoing that poses risk of significant liability or reputational harm to TWU. The Board shall also be informed of other matters that are a significant compliance concern in the judgement of the Chancellor and President or the Chief Compliance Officer.

## **III. Protection Against Unlawful Retaliation**

- Section 1 Protection Against Disciplinary Action. No disciplinary or retaliatory action shall be taken against any individual who, in good faith, reports or causes to be reported suspected wrongdoing or who assists in an authorized investigation of alleged wrongdoing. This prohibition does not extend to disciplinary action for self-reported violations.
- Section 2 Unlawful Retaliation. Any individual who engages in retaliation may be subject to disciplinary action, including termination of employment, termination of authority to act on behalf of TWU, or termination of affiliation with TWU. Good faith reports of retaliation will be reviewed and investigated in the same manner in which other allegations of suspected wrongdoing are handled.

## **IV. False Reports or Information**

- Section 1 False Reports or Information. This policy does not protect an individual who knowingly files a false report of wrongdoing or retaliation, an individual who intentionally provides false information during an investigation, or an individual who provides information without a reasonable belief in the truth or accuracy of the information.
- Section 2 Disciplinary Action for False Reports or Information. Any individual who knowingly files a false report or intentionally provides false information during an investigation may be subject to disciplinary action, termination of employment, termination of authority to act on behalf of TWU, or termination of affiliation with TWU.

**V. Posting Notice of Procedures for Reporting Suspected Wrongdoing or Retaliation**

Posting Notice. TWU will publish on its Ethics and Compliance Hotline website contact information for receiving reports of suspected wrongdoing and retaliation.

**VI. University Regulations and Procedures – Reporting Suspected Wrongdoing and Protection from Retaliation**

Adoption of Regulations and Procedures. TWU is committed to the ethical stewardship of University resources in compliance with all applicable ethical, legal, and regulatory standards and requirements. TWU shall adopt University Regulations and Procedures concerning reporting suspected wrongdoing and protection from retaliation consistent with state and federal law.

**REVIEW**

This policy will remain in effect and published until it is reviewed, updated, or archived. This policy is to be reviewed once every six years. Interim review may be required as a result of updates to federal and state law or regulations, or internal processes or procedures.

**REFERENCES**

[Texas Government Code Chapter 554. Protection For Reporting Violations of Law](#)

[TWU Ethics and Compliance Hotline](#)

**FORMS AND TOOLS**

None

**Adopted: November 10, 2016**

**Revised: May 17, 2024**