



# WHISTLEBLOWING POLICY

## Harvard Human Resources

## Guidelines & Best Practices

### POLICY STATEMENT

*Members of the Harvard community are encouraged to report suspected violations of law or University policy to their supervisor, to a local tub finance officer, to a local or central human resources officer, or to the Compliance Hotline.*

*The University will protect from retaliation members of the Harvard community who make good faith reports of suspected violations of law or University policy.*

### REASON FOR POLICY

*To encourage all members of the Harvard community to report suspected violations of law or Harvard policy.*

*To provide a mechanism for reporting and investigating suspected violations.*

*To reinforce Harvard's non-retaliation policy for any member of the Harvard community who in good faith voices concerns, seeks advice, files a complaint or grievance, seeks the aid of Human Resources, testifies or participates in investigations, compliance reviews, proceedings or hearings, or opposes actual or perceived violations of Harvard University's policy or unlawful acts.*

### ENTITIES/INDIVIDUALS COVERED BY THIS POLICY

- All Units of the University
- All members of the University community:
  - Faculty, including senior, junior and visiting faculty
  - Other salaried and non-salaried academic appointees, including post-doctoral fellows, research fellows, and teaching assistants
  - Staff, including salaried exempt workers and hourly non-exempt workers
  - Students
  - Contractors, including independent contractors, external consultants, workers hired through an outside employment agency, and workers employed on campus through service vendors
  - Official visitors
  - Volunteers

### PROCEDURES

#### Reporting a Concern

- An employee (staff or faculty) who has a good faith suspicion of a violation of law or Harvard policy is encouraged to report the concern promptly to his or her supervisor, local tub finance officer, or local or central human resources officer.
- Any member of the Harvard community (as defined in the "Entities/Individuals Covered By This Policy" section of this policy), or an employee who is uncomfortable reporting suspected violations of law or Harvard policy to a supervisor or other appropriate University officer, may report the concern via the Compliance Hotline. The Compliance Hotline is an independent and anonymous reporting program that facilitates the registering of concerns through a toll-free, 24-hour-a-day phone line or through a website.

## **PROCEDURES** *(continued, "Reporting a Concern")*

- A member of the Harvard community who suspects a violation of law or Harvard policy should not accuse or confront any individual directly or investigate the matter personally. Rather, the individual should discuss the matter with his or her supervisor, local tub finance officer, local or central human resources officer, or the Compliance Hotline as provided by this policy.
- A supervisor or other University officer who receives a concern from another employee should promptly contact the Director of RMAS to determine next steps, unless further procedures are provided through another applicable University policy (including as an example, but not limited to, the [Sexual Harassment](#) policy or the [Discrimination Policy and Review Procedure](#)).

## **RELATED POLICIES**

Important Note: This is not intended to be an exhaustive listing of policies that support the ethical conduct of Harvard's academic, research and business activities. All Harvard's policies implicitly support such behavior. The following policies are considered to have particular relevance.

### Office of the General Counsel (OGC)

[Harvard University Policy on Conflicts of Interest and Commitment for Senior Officers and Administrators](#)

### Harvard Human Resources (HHR) – Staff Personnel Manual

[General Employment Policies](#)

[Conflicts of Interest or Commitment](#)

[Non-Retaliation Policy](#)

### Office of the Provost – Policies and Guidelines

[Statement on Outside Activities of Holders of Academic Appointments: University Statement on Rights and Responsibilities](#)

[Principles Governing Commercial Activities of Harvard University, with application to Partnerships between the University and Outside Organizations](#)

## **ADDITIONAL RESOURCES**

*Have questions? Contact the following offices with questions about these guidelines and best practices.*

- a) Harvard Human Resources (HHR), Office of Labor and Employee Relations (LER): HHR/LER maintains the Whistleblowing policy and provides advice and assistance to members of the Harvard community on the operation of the policy and on related concerns, as necessary.  
<http://www.laborrelations.harvard.edu> or 617-495-2786

## **ADDITIONAL RESOURCES** *(continued)*

*Have questions? Contact the following offices with questions about these guidelines and best practices.*

- b) Office of the University Ombudsman: The Ombudsman provides advice and assistance to members of the Harvard community on the operation of the policy and on specific concerns, as necessary.  
<http://www.universityombudsman.harvard.edu/> or 617-495-7748
- c) Office of the General Counsel (OGC): OGC provides advice and assistance to management on the operation of the policy and on specific concerns, as necessary.  
<http://www.ogc.harvard.edu/> (617-495-1280)
- d) Local Unit Human Resources Offices. Local Human Resources offices provide advice and assistance on the operation of the policy and on specific concerns, as necessary, and may receive reports of any suspected violations of law or Harvard policy from employees (staff or faculty) under this policy.  
[http://harvie.harvard.edu/docroot/doc-lib/700\\_Miscellaneous/localhumanresources.pdf](http://harvie.harvard.edu/docroot/doc-lib/700_Miscellaneous/localhumanresources.pdf)
- e) Risk Management and Audit Services (RMAS): RMAS provides an anonymous mechanism for members of the Harvard community to report concerns related to compliance with law or University policy and manages the routing, research and resolution of such concerns.  
<http://vpf-web.harvard.edu/rmas/contact.html> or 617-495-3642
- f) Compliance Hotline. The Compliance Hotline may receive anonymous reports of any suspected violations of law or Harvard policy from members of the Harvard community under this policy.  
<https://www.integrity-helpline.com/HarvardUniversity.jsp> or 877-694-2275