

INVESTIGATION PROTOCOL

Purpose

The University of Connecticut is committed to conducting its affairs in accordance with its core values as stated in its Code of Conduct and as required by federal, state, and local laws and University policy. The Office of University Compliance (“University Compliance”) strives to prevent, detect, and assist management to correct violations of law or policy, which may result from mistake, inadvertence, lack of information, or deliberate misconduct. This protocol establishes an administrative process for dealing with allegations of misconduct so that the integrity of the conduct of business at the University of Connecticut may be preserved.

Reporting Concerns

University employees are expected to report good faith concerns about possible violations of the University’s [Code of Conduct](#), which includes possible violations of law and policy. Although employees are encouraged to resolve issues by reporting concerns to the appropriate contact person in their department, employees may not feel that adequate steps will be taken to resolve the expressed concerns or there may be a legitimate fear of retaliatory acts. Therefore, University Compliance maintains a private safe harbor to receive and direct compliance concerns for review, investigation, and resolution. Employees may report such concerns through the University’s *Reportline* by calling 1-888-685-2637 or reporting via the web at <https://uconncares.alertline.com/gcs/welcome>. The identity of individuals who wish to report concerns to University Compliance anonymously will be protected to the extent possible under the law¹. However, the identities of individuals who report or are involved in matters concerning immediate threat to life or property, if known, will be disclosed to the proper authorities.

Retaliation for making good faith reports is strictly prohibited. The University shall provide appropriate protection and support to those who may experience acts of retaliation related to the reporting of compliance concerns, in accordance with the University’s [Non-Retaliation Policy](#).

Investigation Process

Evaluation of Concerns: University Compliance shall evaluate the concerns raised and, if necessary, refer the matter to the most appropriate University office for review. If the reported concern is minor and the solution is straightforward without the need for an extensive investigation, University Compliance may ask the appropriate administrator to promptly take corrective action to resolve the concern. This will be assessed on a case-by-case basis.

Notification: Individuals who are the subject of a report shall be notified in writing. In some circumstances, such notification will be delayed if University Compliance concludes it may risk the integrity of the investigation.

Information Collection: University Compliance will make every effort to collect information pertinent to the allegations, including through conducting interviews and the review of documentation.

Privacy: Individuals, who report in good faith, will be accorded privacy and/or anonymity to the extent possible under the law². In order to protect the integrity of the investigation and mitigate any potential instances of retaliation, any person made aware of a reported concern will be asked to keep the matter private. However, the identities of individuals who report or who are involved in matters concerning immediate threat to life or property, if known, will be disclosed to the proper authorities.

¹ In some circumstances, given the information contained within the report, it is difficult to ensure anonymity. For example, if a report includes information that could reveal the reporters identity based on specific details or proximity to the issue being reported.

² Individuals may also have no expectation or request anonymity.

Cooperation: The subject of the reported concern and all individuals participating in the investigation are expected to cooperate and provide truthful information throughout the investigation. Failure to comply with these requirements is a violation of University policy and may result in further disciplinary action, up to and including dismissal.

University Compliance is authorized to have access to all University records, facilities, and personnel necessary to conduct a thorough review of the concerns, except as may be restricted by law. All units are expected to cooperate with any request University Compliance may make in an effort to access necessary evidence during the course of an investigation.

Standard of Evidence: There is no assumption of wrongdoing; rather the investigation shall be an impartial and objective fact-finding function in order to determine, based upon a preponderance of the evidence, whether the allegations have been substantiated. If allegations are substantiated, University Compliance will recommend appropriate follow up measures to management.

Internal Disposition/External Reporting: At the conclusion of an investigation, the Chief Compliance Officer (or designee) may refer the matter to the proper internal division of the University for any appropriate action (e.g. Human Resources). In addition, the Chief Compliance Officer (or designee), in consultation with the Office of the General Counsel, shall consider whether any notification or report should be directed to an outside entity. Such entities may include, but are not limited to: the Office of State Ethics, the Office of the Chief State's Attorney, the Auditors of Public Accounts, and the National Collegiate Athletic Association (NCAA).

Timeline: It is the intention of University Compliance that investigations are conducted thoroughly and expeditiously. University Compliance will provide the subject of the investigation updates, when appropriate, regarding the estimated progress of the investigation.

Documentation: Appropriate records will be maintained that document the nature of the allegation(s), the investigation, the findings, and any recommendations for corrective action. Documents will be retained in accordance with relevant State statutes and University policies and procedures.

The University of Connecticut complies with all applicable federal and state laws regarding non-discrimination, equal opportunity and affirmative action, including the provision of reasonable accommodations for persons with disabilities. Employees and students with disabilities engaging with University Compliance in the course of an investigation may request reasonable accommodations to address limitations resulting from a disability.

The Chief Compliance Officer (or designee) shall keep the President and Board of Trustees appropriately informed of any potential serious or widespread compliance concerns.

Approved By: _____



Kimberly Fearney

Associate Vice President and Chief Compliance Officer

Date: _____

3-1-20