

Union Theological Seminary Whistleblower Policy

To help ensure that Union Theological Seminary (the “Seminary”) complies with the highest standards of financial reporting and lawful and ethical behavior, the Board of Trustees establishes the following procedures for the reporting of illegal or unethical conduct in connection with the Seminary’s finances or other aspects of its operations, and the retention and treatment of such complaints, including confidential, anonymous submissions received from faculty and staff.

Should any person know or have a reasonable belief that persons associated with the Seminary plan to engage or have engaged in illegal or unethical conduct in connection with the finances or other aspects of the Seminary’s operations, that person should immediately file a report with Chair of the Audit Committee, as well as with the Chief Human Resources Officer. Faculty and staff may submit Reports on a confidential, anonymous basis. If the Report concerns the Chair of the Audit Committee, or the Chief Human Resources Officer, or the complainant is not comfortable reporting there, then the complainant should notify the President instead. (Issues arising under the Seminary’s equal employment opportunity policy, including the policy against harassment, employee benefit policies and issues generally handled by individual responsible for the Seminary’s personnel practices and procedures are not covered by this Policy. Mechanisms for resolving such issues are addressed in the Employee Guide to Human Resources Policies.)

The Chief Human Resources Officer or the President will send all Reports to the chair of the Audit Committee, or if the chair is the subject of the Report, to another member of the committee, prior to its next regularly scheduled meeting. Reports to the chair or other committee member will include a copy of the Report, its date, nature and source (unless the complainant is an employee who has requested confidentiality and/or anonymity), how it was received, whether the Chair of the Audit Committee, the Chief Human Resources Officer, or the President regards the Report as credible, and proposals to address it. The chair or other committee member will promptly notify the full committee about the Report, except that the Report will not be shared with an individual who is the subject of the Report. All credible allegations will be followed up promptly, with further investigation conducted if needed to resolve disputed facts. In conducting its investigations, the Seminary will respect an employee’s request for confidentiality and/or anonymity and will strive to keep the identity of any complainant as confidential as possible, consistent with the need to conduct an adequate review and investigation.

The Audit Committee chair or other committee member will inform the Chair of the Board if any Report is confirmed, or if the committee, upon consultation, otherwise believes that the Board should be made aware of the situation. The committee will have ultimate authority over the treatment of any Report reported to it, subject to the Board’s oversight. The committee or, in the case of complaints reported to the full Board, the Board will oversee maintenance of records of all Reports in accordance with the Seminary’s document retention policy.

The Seminary may take appropriate action in response to any Report, including, but not limited to, disciplinary action (up to and including termination) against any person who, in the Seminary's assessment, has engaged in misconduct and will report such misconduct to the relevant civil or criminal authorities as required by law.

The Seminary will not knowingly, with the intent to retaliate, take any action harmful to any person, including interference with lawful employment or livelihood, for reporting a Report in good faith pursuant to this policy or directly to law enforcement officers, governmental agencies or bodies, or persons with supervisory authority over the complainant. Likewise, there will be no punishment or other retaliation for providing information regarding a Report in good faith to, or otherwise assisting in any investigation regarding a Report conducted by, the Seminary, law enforcement officers, governmental agencies or bodies, or persons with supervisory authority over the complainant. Finally, there will be no punishment or other retaliation for filing a Report in good faith, or otherwise participating or assisting in a proceeding filed or about to be filed (with any knowledge of the Seminary) regarding any Report. An individual who deliberately or maliciously provides false information may be subject to disciplinary action (up to and including termination).

No Trustee, officer, employee, student or volunteer of the Seminary who in good faith reports any action or suspected action taken by or within the Seminary that is illegal, fraudulent or in violation of any adopted policy of the Seminary shall suffer intimidation, harassment, discrimination or other retaliation or, in the case of employees, adverse employment consequence.

A copy of this policy shall be distributed to all Trustees, officers, employees and students and to volunteers who provide substantial services to the Seminary.