



Whistleblower Protection

POLICY STATEMENT

Cornell University prohibits any form of retaliation, intimidation, harassment, or adverse employment action against any trustee, officer, employee, agent, or volunteer of the university who, in good faith, reports any activity within the university that is suspected of being illegal, fraudulent, or in violation of any governmental regulation or university policy (commonly called a “whistleblower”). The university investigates reports of such activity promptly, fairly, and in accordance with this policy.

REASON FOR POLICY

The university strives to operate ethically and lawfully in all of its operations, to encourage reporting, and to address appropriately, without retaliation or other adverse consequences, reports of illegal activities, fraud, or policy violations by employees or agents of the university.

ENTITIES AFFECTED BY THIS POLICY

- Ithaca-based locations
- Cornell Tech campus
- Weill Cornell Medicine campuses

WHO SHOULD READ THIS POLICY

- All university community members

MOST CURRENT VERSION OF THIS POLICY

- www.dfa.cornell.edu/policy/policies/whistleblower-protection

POLICY 4.17

Whistleblower Protection

CONTENTS

Policy Statement	1
Reason for Policy	1
Entities Affected by this Policy	1
Who Should Read this Policy	1
Most Current Version of this Policy	1
Related Resources	3
Contacts	4
Definitions	5
Responsibilities	6
Principles	7
University Encourages Reporting	7
Retaliation Prohibited	7
Confidentiality	7
Procedures	8
Reporting	8
University Response to Reports	8

POLICY 4.17

Whistleblower Protection

RELATED RESOURCES

University Policies and Information Applicable to All Units of the University

[University Policy 1.2, Academic Misconduct](#)

[University Policy 1.7, Financial Conflict of Interest Related to Research](#)

[University Policy 3.1, Accepting University Gifts](#)

[University Policy 3.6, Financial Irregularities, Reporting and Investigation](#)

[University Policy 3.25, Procurement of Goods and Services](#)

[University Policy 4.6, Standards of Ethical Conduct](#)

[University Policy 4.14, Conflicts of Interest and Commitment \(Excluding Financial Conflict of Interest Related to Research\)](#)

[University Policy 5.1, Responsible Use of Information Technology Resources](#)

[University Policy 6.4, Prohibited Discrimination, Protected Status \(Including Sexual\) Harassment, and Bias Activity](#)

[Campus Code of Conduct](#)

[President's Statement on Affirmative Action](#)

University Policies and Information Applicable to Only Ithaca-Based Locations and Cornell Tech

[University Policy 3.14, Business Expenses](#)

[Faculty Council of Representatives Resolution on Romantic and Sexual Relationships Between Students and Staff, Chapter 6, Faculty Handbook](#)

[Faculty Handbook](#)

[Human Resources Policy 6.13.1, Conflict of Commitment: Dual Appointment, Exempt Staff](#)

University Policies and Information Applicable to Only Weill Cornell Medicine Campuses

[Academic Staff Handbook](#)

Personnel Manual

External Documentation

[New York Nonprofit Revitalization Act, as codified by §715-b of the New York State Not-for-Profit Corporation Law](#)

University Forms and Systems Applicable to All Units of the University

[Cornell Hotline](#)

POLICY 4.17 Whistleblower Protection

CONTACTS

Direct any general questions about this policy to your college or unit administrative office. If you have questions about specific issues, contact the following offices.

Subject	Contact	Telephone	Email/Web Address
Policy Clarification and Interpretation	University Audit Office	(607) 255-9300	audit@cornell.edu
	Weill Cornell Medicine Audit Office	(646) 962-6940	audit@cornell.edu
Reporting Suspected Violations	University Audit Office	(607) 255-9300	audit@cornell.edu
	Weill Cornell Medicine Audit Office	(646) 962-6940	audit@cornell.edu
	Cornell University Hotline	(866) 293-3077	www.hotline.cornell.edu

If you believe your questions have not been answered or you wish to remain anonymous, you may file a report through [Cornell University's Hotline](#) call-in number at (866) 293-3077 or website at hotline.cornell.edu.

POLICY 4.17

Whistleblower Protection

DEFINITIONS

These definitions apply to terms as they are used in this policy.

Adverse Employment Action	Failure to promote; adverse impact on compensation, termination, discharge, suspension, or demotion; other change in responsibilities, whether formal or informal; or other negative consequences.
Whistleblower	An individual who, in good faith, reports any activity taken by or within the university that is suspected of being illegal, fraudulent, or in violation of any governmental regulation or university policy.

POLICY 4.17

Whistleblower Protection

RESPONSIBILITIES

The major responsibilities each party has in connection with this policy are as follows:

Investigating Office	Conduct timely investigations of whistleblower reports. Provide fair processes for those facing accusations of misconduct, including notification of allegations and opportunity for response. Communicate findings and conclusions to the responsible senior leadership.
Unit Head	Communicate the provisions of University Policy 4.17, Whistleblower Protection, to all unit faculty and staff members.
University Audit Office	Receive reports of violations of law, regulations or university policy and refer them to the appropriate university offices (including where appropriate, retaining responsibility within the Audit unit) for investigation and corrective action. Inform University Counsel of all whistleblower reports received. Communicate information regarding whistleblower reports, when appropriate, to the Audit Committee of the Board of Trustees. Refer reports of whistleblower retaliation arising under this policy to Workforce Policy and Labor Relations for investigation and corrective action.
University Community Member	Report, in good faith, suspected or actual illegal activities, fraud, regulatory, or policy violations, as provided in this policy. Refrain from retaliating against whistleblowers. Report any known or suspected acts of whistleblower retaliation. Cooperate fully and in a timely manner with investigations, including, but not limited to, participating in interviews and providing all requested information, documentation, and access to records, systems, personnel, and physical spaces.
Workforce Policy and Labor Relations	Investigate reports of retaliation against whistleblowers, and take corrective action, as appropriate.

POLICY 4.17

Whistleblower Protection

PRINCIPLES

University Encourages Reporting

The university encourages the good-faith reporting of activity suspected of being illegal, fraudulent, or in violation of governmental regulations or university policy. Reports will be fully investigated by the university.

◆ **Note:** Policies to which whistleblower protection applies include:

- Policies designed to prevent financial wrongdoing, such as internal and external financial controls, accounting policies, and policies prohibiting fraud, theft, embezzlement, bribery, kickbacks, and abuse or misuse of university assets.
- Conflict of interest policies.
- Policies addressing unethical conduct, harassment, and discrimination policies.
- Policies prohibiting academic or research misconduct or other regulations applicable to conduct of research or use of federal funds.

Reports of policy violations in areas unrelated to these may not be entitled to whistleblower protection.

Retaliation Prohibited

Individuals who make good-faith reports of activity suspected of being illegal, fraudulent, or in violation of governmental regulations or university policy (whistleblowers) will not be subject to any form of retaliation, intimidation, harassment, or adverse employment action by the university.

A whistleblower is not necessarily granted immunity from consequences that are the result of participating or being complicit in the violation or suspected violation that is the subject of the whistleblower's report.

Individuals who engage in retaliatory actions against whistleblowers will be subject to discipline, up to and including separation from the university.

Confidentiality

When requested by an individual who reports a suspected violation, the university will take reasonable steps to keep the subject matter of such reports and the identity of the reporter confidential, subject to applicable legal requirements, and the need to conduct an appropriate investigation, afford fair process to accused individuals, and resolve actual violations.

POLICY 4.17

Whistleblower Protection

PROCEDURES

Reporting

The university encourages the reporting of any activity within the university that is suspected of being illegal, fraudulent, or in violation of governmental regulations or university policy. A good-faith report requires an individual to have an honest and reasonable belief that such action has occurred or will occur. Individuals who make intentionally false or malicious reports will be subject to discipline, up to and including separation from the university.

Reports of suspected violations of university policy should be made in accordance with the procedures contained in those policies. Where the subject-specific policy lacks explicit reporting procedures or where the conduct goes beyond what can be appropriately addressed under an applicable policy, contact the University Audit Office or the University Hotline.

Reports of suspected whistleblower retaliation should be made to Workforce Policy and Labor Relations or the University Hotline.

◆ **Caution:** Report emergencies to the Cornell University Police Department or applicable local law enforcement agency.

University Response to Reports

Whistleblower reports will be fully investigated by the university.

When the University Audit Office receives a report of violation of applicable law or university policy, it will refer the report to the appropriate university office for investigation and corrective action or retain the investigation as an Audit investigative matter, if the report is of a financial irregularity. Additionally, the University Audit Office will inform University Counsel of all whistleblower reports received.

The office to which a report is referred will conduct a timely investigation to determine whether any further action is warranted. Investigations will provide fair processes for those facing accusations of misconduct, which will include notification of allegations and opportunity for response. University Counsel and the investigating office will consult to determine whether external expertise is needed.

Faculty, staff, and students must cooperate fully and in a timely manner with the investigation, including, but not limited to, participating in interviews and providing all requested information, documentation, and access to records, systems, personnel, and physical spaces. The university is committed to timely resolution of whistleblower reports.

Once an investigation is completed, the investigating office will communicate its findings and conclusions to the responsible senior leadership.

POLICY 4.17 Whistleblower Protection

PROCEDURES, continued

The University Audit Office will report, as appropriate, the findings and conclusions of investigations to the Audit Committee of the Board of Trustees.

◆ **Note:** A person who is the subject of a whistleblower report is excluded from being present or participating in any deliberations regarding the report, except to provide background information or to answer questions at the request of the committee.