SAFE REPORTING POLICY

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For any comments, feedback, or query, please contact: policies@aub.edu.lb.
Last updated on: October 13, 2014
Section 1 – Introduction

All representatives of AUB have an obligation to conduct themselves in a manner that is consistent with the University’s Principles of Ethical Conduct and Code of Business Ethics.

Similarly, the University is committed to following the laws and regulations of Lebanon, as well as those of the United States and other countries where applicable. The University maintains policies and procedures designed to ensure compliance with laws and regulations, and the intent of the Board, and to safeguard and steward the University’s physical and financial assets and reputation. All representatives of AUB should familiarize themselves with the laws and regulations and the university policies and procedures applicable to their area of activity.

This Safe Reporting Policy furthers AUB’s commitment to the Principles of Ethical Conduct by describing the institutional reporting mechanisms available to representatives of AUB.

Section 2 - Safe Reporting

1. General

Representatives of AUB are encouraged to report conduct that (1) does not meet the University’s ethical standards, (2) violates applicable laws or regulations, or (3) violates university policies or procedures. Representatives of AUB may also report significant instances of waste or inefficiency, process failure, non-compliance with contractual obligations, or any circumstances that could lead to inaccuracy in the University’s financial reporting.

2. Good Faith Reporting

Reports made pursuant to this policy must be based on reasonable belief and must not be malicious or frivolous. Frivolous or malicious allegations reported hereunder will themselves be considered a violation of the University’s principles of ethical conduct.

3. No Retaliation or Intimidation

The University will not tolerate under any circumstances any retaliation or intimidation, directly or indirectly, against anyone who, in good faith, makes a report. Retaliation or intimidation means any punitive action taken against a person for making a good faith report, including, but not limited to: (1) disciplinary action, (2) termination, (3) adversely affecting employment environment, or (4) a threat to do any of the foregoing. The protections afforded hereunder do not apply, however, to insulate individuals from appropriate administrative or disciplinary action for conduct that violates the University’s principles of ethical conduct.
4. Applicable Policies and Procedures

Issues reported pursuant to this policy shall normally be addressed in accordance with applicable university policies and procedures. Reporters are encouraged to consult with university resources such as a supervisor, dean/director/vice president, the university auditor, the vice president for legal affairs, etc., as appropriate. This policy is not meant to replace or supersede reporting methods which already exist on campus or at the medical center. For example, alleged violations of the University’s Policies Concerning Sexual and Other Discriminatory Harassment shall be investigated and addressed in accordance with the University’s Procedures to Address Formal Allegations of Sexual and Other Discriminatory Harassment. Alleged violations of the University’s Fraud Policy shall be addressed by the university auditor via the procedures set forth therein. Alleged violations of the University’s human resources policies shall be addressed via applicable human resources procedures or under the University’s Grievance Policy. In particular, identification or allegations of personal improprieties or irregularities, whether moral, ethical, or behavioral, should first be addressed by the supervisor in the respective department in coordination with university human resources.

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Section 3 - How to Make a Safe Report

1. Initial Reports

Reports under this policy, including reports of alleged retaliation, may be made orally or in writing, giving as much detail as possible. Reports should normally proceed through the relevant supervisor, dean/director/vice president, or the provost. Alternatively, reports may be made directly to the university auditor or the secretary of the university. Reports may also be made on an anonymous basis through a website and e-mail account maintained by the university auditor for this purpose. Reports involving the university auditor may be made to the president or directly to the chair of the University’s Audit Committee. All reports should provide sufficient facts that are capable of investigation; vague reports will not be investigated.

2. Confidentiality

The persons and offices that receive and/or investigate safe reports should protect the identity of the person making the report to the extent possible consistent with reasonable investigation and relevant laws and policies in effect at the time of the alleged misconduct. Similar consideration should be given to all individuals against whom allegations of misconduct are made.
3. Reporting

The university auditor will report serious instances of misconduct to the chair of the University’s Audit Committee. The university auditor shall provide a summary report to the Audit Committee each calendar year concerning the overall use of the safe reporting mechanism by representatives of AUB.

Section 4 - Contact Information

- **University Auditor:** Phone: +961 1 350000 Extension: 2350 Fax: +961 1 744463
  E-mail: auditor@aub.edu.lb.
  Mailing Address: American University of Beirut, Internal Audit Office, Old Pharmacy Bldg. - 2nd Floor P.O. Box: 11-0236, Riad El Solh 1107-2020, Beirut, Lebanon

- **Secretary of the University:** Phone: +1-212-583-7680 Fax: +1-212-583-7650
  E-mail: oconnor@aub.edu.
  Mailing Address: American University of Beirut, The Debs Center, 3 Dag Hammarskjold Plaza, 8th Floor New York, NY 10017-2303, USA

- **Vice President for Legal Affairs:** Phone: +961 1 350000 Extension: 2529 Fax: +961 1 744466
  E-mail: pmay@aub.edu.lb.
  Mailing Address: American University of Beirut, Office of Legal Affairs, College Hall - 5th Floor P.O. Box: 11-0236, Riad El Solh 1107-2020, Beirut, Lebanon

- **Chair of the University’s Audit Committee:** c/o Eileen O’Connor
  E-mail: oconnor@aub.edu
  Mailing Address: American University of Beirut, The Debs Center, 3 Dag Hammarskjold Plaza, 8th Floor New York, NY 10017-2303, USA

- **Anonymous Disclosure:**
  English: [http://www.aub.edu.lb/internal_audit/Pages/safereporting.aspx](http://www.aub.edu.lb/internal_audit/Pages/safereporting.aspx)
  Arabic: American University of Beirut - Internal Audit - Safe Reporting - Arabic