Welcome to the FOA Newsletter

Welcome to the third *Audit Alert* newsletter from the Financial and Operational Audit office. Please feel free to forward comments, questions or suggestions:

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**Financial and Operational Audit website** – http://adminfinance.nku.edu/foa/index.php

**Fraud Reporting Hotline**

http://adminfinance.nku.edu/foa/report.php

or

859-572-1300

As part of the University commitment to ethical behavior and compliance with University regulations we have established two ways for you to report activities that may involve unethical or inappropriate behavior. Both are easy and convenient. Financial and Operational has recently established a web-based (http://www.nku.edu/foa/report.php) and telephone hotline (859-572-1300) to report inappropriate activity of a financial or ethical nature. This can be utilized by employees, students, vendors and the general public. Be on the lookout for more details.

In general, if an employee has a concern they should bring it to the attention of their supervisor. If the situation is not resolved they are encouraged to use our new reporting line and leave a detailed message. This can be done *anonymously* using our web based reporting form. You can also call our new telephone hotline number at 859-572-1300 and leave a detailed message describing your concerns.

If you’d prefer to discuss a situation with an internal auditor you can contact us by telephone (859-572-6117) or by e-mail. All information will remain confidential. The University has an established policy that prohibits retaliation against those reporting a violation.

**Examples of Activity to Report**

- Misuse of Funds or Resources
- Falsifying Records (Payroll, Financial, etc)
- Misappropriations
- Improper Vendor Relationship or Activity
- Receiving Improper Gifts

NKU has a policy related to Ethics and Code of Conduct. It can be found in the Administrative Regulations (AR-I-1.0-1). All employees should periodically review this policy and their compliance with its regulations. A summary is provided on the back.
Ethical Principles
The Northern Kentucky University (NKU) Ethical Principles and Code of Conduct are intended to document expectations of responsibility and integrity. Exemplary ethical conduct is critically important in our relationships with colleagues, trustees, students, volunteers, contractors, and the public.

Each member of the University must endeavor to:
1. promote the best interests of NKU
2. foster the Vision, Mission and Values of the University
3. preserve the public’s respect and confidence in NKU
4. exhibit personal integrity, honesty, and responsibility in all actions
5. provide an environment of mutual respect, impartiality, and collaboration
6. maintain confidentiality in all matters deemed confidential
7. assure independence of judgment free from conflicting interests
8. ensure that relationships that constitute or could be perceived as conflicts of interest are fully and properly disclosed and University guidelines are followed
9. comply with the policies and procedures of the University and applicable state and federal laws and regulations
10. demonstrate stewardship of University property and resources

Code of Conduct
Those acting on behalf of the University have a duty to conduct themselves in a manner that will maintain the public’s trust in the integrity of the University and to act compatibly with their obligation to the University. The Code of Conduct establishes guidelines for professional conduct for University members, including regents, executive officers, faculty, staff and other individuals employed by the University, those using University resources or facilities, and volunteers and representatives acting as agents of the University (collectively, “University members”).

The Code of Conduct is intended as a general guide to determine what conduct is expected and to help individuals to determine behaviors that should be avoided. Employees are strongly encouraged to consult with their supervisor.

Nondiscrimination Policy
Equal opportunity shall be provided for all persons throughout the University in recruitment, appointment, promotion, payment, training, and other employment practices...

Confidentiality of Information
University members are entrusted with personal and institutional information that should be treated with confidentiality and used only for conducting University business...

Use of the University’s Name
University members may not use or allow the use of the name of the University or identify themselves as employees of the University in the public promotion or advertising of commercial products without prior written approval...

University Resources
University members are entrusted with protecting the property, equipment, and other assets of the University and exercising responsible, ethical behavior when using the University’s resources. University assets are intended for University activities...

Sexual Harassment
The University is committed to maintain a work-learning environment free of sexual harassment. The policy of NKU, approved by the Board of Regents, prohibits sexual harassment of students, faculty and staff and assures that complaints of sexual harassment will be treated and investigated with full regard for the University’s due process requirements...

Personal Relationships
The critical concern is that personal relationships, whether positive or negative, should not inappropriately or unfairly affect decisions.

Conflicts of interest may arise when people are involved in making decisions affecting any members of their families, relatives, or those with whom they have or have had personal relationships...

Employment of Relatives
No relative of any employee of the University may be appointed to any position in the University over which the related employee exercises immediate supervisory or line authority...

Intellectual Property
All members of the university community are expected to be responsible stewards of University resources and comply with the University's intellectual property policy...

Conflict of Commitment
Decisions and the judgment upon which the decisions are based must be independent from conflicting interests and must hold the best interest of the University foremost. Conflicts of commitment relate to an individual’s distribution of effort between University appointment and outside activities...

Conflict of Interest
Confidence in the University is put at risk when the conduct of University members does, or may reasonably appear to, involve a conflict between private interests and obligations to the University. All University members shall avoid conflict between private interests and obligations to the University...

Financial Advantage
Members of the University community must exhibit personal integrity, honesty and responsibility in all actions. Official position or office shall not be used to obtain financial gain or benefits for oneself or members of one’s family or business associates...

Acceptance of Gifts or Benefits
No member should accept any type of reward, monetary or non-monetary, if there is an explicit or implicit assumption that influence has been exchanged for the favor. See full policy for specific guidelines...

Clarifications and Reporting Violations
When any doubt about the propriety of an action exists, the University’s policy requires a full and frank disclosure to an appropriate individual with sufficient authority to address the matter.

University members are expected to report violations of this policy to an appropriate individual. The University will not tolerate any retaliation against a University member who makes a good faith report of a violation. Potential penalties for violations of this code include but are not limited to written reprimands, probation, suspension, and termination.