



Non-Retaliation Policy

POL 08.15.07

Effective Date: February 12, 2021

1.0 Policy Purpose

Brown prohibits Retaliation against employees who make Good Faith Reports of potential violations of laws, regulations, or a University policy. The University recognizes that employees who report violations must be free from fear of Retaliation in support of the University's mission.

2.0 To Whom the Policy Applies

This policy applies to all staff, faculty, students, contractors, visitors and other members of the University community.

3.0 Policy Statement

The University prohibits Retaliation against anyone who, in good faith, submits a complaint, a report, or an inquiry of a violation of a University policy, participates in the University's complaint resolution process, or alleges improper or wrongful activity. Anyone found to take retaliatory action covered under this policy will be subject to disciplinary action, up to and including termination of employment or contractual services to the University. Additionally, no employee shall be disciplined when they refuse to follow a directive which constitutes fraud or violates local, state, federal or other applicable laws and regulations.

4.0 Definitions

For the purpose of this policy, the terms below have the following definitions:

Complainant: An employee, vendor, contractor or other University member who files a Good Faith Report to a supervisor, Department of Public Safety, Office of General Counsel, University Risk Management, Audit and Compliance, Office of Institutional Equity and Diversity, University Human Resources or **Brown's Anonymous Reporting Hotline**.

Good Faith Report: A report or complaint of an honest and reasonable belief of a violation to a University policy, law, incident of non-compliance, or misconduct.

Retaliation: An action that adversely affects a staff, faculty, student, contractor, visitor, or other member of the University community because of the individual's Good Faith Report. Such action may include intimidation, reprisal, coercion, threats, discharge, discipline, or discrimination in employment that result from the Good Faith Report.

5.0 Responsibilities

All individuals to whom this policy applies are responsible for becoming familiar with and following this policy. University supervisors are responsible for promoting the understanding of this policy and for taking appropriate steps to help ensure compliance with it.

6.0 Consequences for Violating this Policy

Failure to comply with this and related policies is subject to disciplinary action, up to and including suspension without pay, or termination of employment or association with the University, in accordance with applicable (e.g., staff, faculty, student) disciplinary procedures.

7.0 Related Information

This policy is not a legal document. This policy does not confer a term of employment, nor is the language intended to establish a contract of employment, express or implied, between any employee and Brown University. The University reserves the right to change, amend or terminate any of its human resources policies at any time for any reason.

Brown University is a community in which employees are encouraged to share workplace concerns with University leadership. Additionally, [Brown's Anonymous Reporting Hotline](#) allows anonymous and confidential reporting on matters of concern online or by phone (877-318-9184).

The following information complements and supplements this document. The information is intended to help explain this policy and is not an all-inclusive list of policies, procedures, laws and requirements.

7.1 Related Policies:

- [Corporation Policy Statement on Equal Opportunity, Non-Discrimination and Affirmative Action](#)
- [Discrimination and Workplace Harassment](#)
- [Sexual and Gender-Based Harassment, Sexual Violence, Relationship and Interpersonal Violence and Stalking Policy](#)
- [Employment Accommodations for Persons with Disabilities](#)
- [Performance Management and Corrective Discipline](#)
- [Code of Conduct](#)
- [Drug Free Workplace Policy](#)
- [Workplace Violence Policy](#)
- [Conflict of Interest and Commitment Policy](#)

7.2 Related Procedures:

- [Non-Retaliation Standard Operating Procedure](#)

7.3 Related Forms: N/A

7.4 Frequently Asked Questions (FAQs): N/A

7.5 Other Related Information: N/A

8.0 Policy Owner and Contact

8.1 Policy Owner: Vice President for Human Resources

8.2 Policy Approved by: Executive Vice President for Finance and Administration

8.3 Subject Matter Contact: Senior Director of Employee and Labor Relations

- Telephone: 401-863-3896
- Email: employeeandlaborrelations@brown.edu

9.0 Policy History

9.1 **Policy Effective Date:** February 12, 2021

9.2 **Policy Last Reviewed:** N/A

9.3 **Policy Update/Review Summary:** Formatted to comply with new University Policy Template. Policy version superseded by this policy:

- Non-Retaliation (20.089), Revision Date: March 12, 2019