

WILSON COLLEGE

WHISTLEBLOWER PROTECTION POLICY

Purpose

Wilson College (the “College”) is committed to lawful and ethical behavior in all of its activities. As such, the College requires its trustees, officers, executive employees, faculty, staff and employees (collectively, “College personnel”) to observe high standards of business and personal ethics and act with honesty and integrity when conducting their duties and responsibilities on behalf of the College. The purpose of this Policy is to require disclosure of all illegal or unethical conduct in connection with the College’s finances or other aspects of its operations, and to describe the methods for College personnel to promptly alert the College regarding these matters.

I. Reporting Required

A. What to Report

All College personnel must promptly report, in compliance with this Policy, any of the following situations of which he/she becomes aware or has reason to believe may exist:

1. violations of any applicable federal, state or local law or regulation;
2. violations of any material policy of the College;
3. any questionable or improper matters regarding bookkeeping, accounting, internal accounting controls, or auditing matters; or
4. inappropriate handling or resolution of any complaint or matter previously reported under this Policy.

Such violations include, but are not limited to, theft; misappropriation of funds; procurement for personal benefit of college property or other college resources; unauthorized use of records or information of a confidential or privileged nature; falsification of reports made to external groups or by employees to management; forgery or alteration of official documents; authorizing or receiving payment for hours not worked, products not received, or services not performed; unauthorized use, destruction, or manipulation of computer files and data; use of college funds for unauthorized personal expenses; improper handling or reporting of financial transactions or funds; conflicts of interest or the appearance of a conflict of interest, and other fraudulent or illegal activities.

An activity is subject to reporting under this Policy regardless of whether or not such activity is within the scope of the reporting individual’s official duties on behalf of the College.

B. How to Report

Reports under this Policy should be made to either the Director of Human Resources or to the Vice President for Finance and Administration, as appropriate. Additionally, at the individuals's discretion and if the circumstances warrant, reports may be made directly to any of the College's officers or trustees. Reports may be made in a way that identifies the reporter or anonymously, at the discretion of the individual making the report.

C. Handling of Reports

Reports under this Policy will be taken seriously and investigated promptly. The College will maintain the confidentiality of reports to the extent feasible in light of its need to investigate and take applicable corrective action. Appropriate corrective action, up to and including termination of employment, will be taken if warranted by the investigation into the reported conduct or for violations of this Policy.

II. Retaliation Prohibited

College personnel are prohibited from taking any adverse action, e.g., to discharge, demote, suspend, threaten, harass or in any manner to discriminate against, other College personnel in the terms and conditions of employment because of any lawful act done by the individual:

1. to report any matter that the individual reasonably believes must be reported under this Policy;
2. to participate in an investigation by a regulatory authority, law enforcement agency, the Board of Trustees or a committee or person designated by the Board of Trustees, or any person with supervisory authority over the individual or who has the authority to investigate reports under this Policy;
3. to report truthful information relating to any state or federal offense to a law enforcement officer;
4. to provide information, cause information to be provided, or otherwise assist in an investigation regarding any conduct which the individual reasonably believes constitutes a violation of applicable law or fraud, when the investigation is brought by a governmental, regulatory, or law enforcement agency, the Board of Trustees or a committee or person designated by the Board of Trustees, a person with supervisory authority over the individual, or such other person working for the College who has the authority to investigate, discover, or terminate improper conduct.

Any individual who has reason to believe that the individual has been subject to retaliation for making a report or participating in an investigation under this Policy must immediately report such alleged retaliation in accordance with section I.A. and I.B. of this Policy. College personnel who retaliate against other College personnel for making a report or participating in an investigation under this Policy will be subject to disciplinary action, up to and including termination of employment.

III. Applicability to Volunteers and Contractors

Although not employees of the College, the College expects its volunteers and contractors to observe high standards of business and personal ethics, especially in connection with their relationship to the College. As such, the College expects and encourages its volunteers and contractors to report misconduct in compliance with this Policy using the procedures identified above.

CERTIFICATE OF ADOPTION

The foregoing Whistleblower Protection Policy was adopted by the Board of Trustees of Wilson College on the ___ day of _____, 2012.

By: _____
Secretary