

DELAWARE VALLEY COLLEGE

Whistleblower Policy

Issued: 9/25/08

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Responsible Executive: Vice President for Finance and Administration

General Policy Statement:

The College's Code of Conduct requires all employees and trustees to follow high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the College, we must practice honesty and integrity in fulfilling our responsibilities. The College expects all of its activities and the activities of its employees and agents to comply with all applicable laws and regulations as well as all College policies. It is each employee's responsibility to alert management immediately about any illegal, unethical or otherwise improper activity. If such a report is made in good faith, the College will make every effort to protect the reporting employee from retaliation or any other action detrimental to employment. This policy applies to all employees (faculty, staff, student employees, and volunteers).

Whistleblower:

A whistleblower is a Delaware Valley College employee who reports an activity that he/she considers to be illegal or unethical to a College Supervisor, Manager, Administrator, Director of Human Resources or via the Hotline Reporting system. The employee is not responsible for investigating the activity or for determining fault or corrective measures.

Fraudulent or Dishonest Conduct:

Fraudulent or Dishonest conduct is a deliberate act or failure to act with the intention of obtaining a material unauthorized benefit for one's self or for someone else. Examples of such include, but are not limited to:

- Violation of law or government regulation;
- Forgery or alteration of documents;
- Unauthorized alteration or manipulation of computer files;
- Fraudulent financial reporting;
- Submitting fraudulent or improper expense account reporting, for example, manipulation of reimbursement expense forms for business transportation, meals, and lodging;

- Misappropriation or misuse of Delaware Valley College's resources;
- Authorizing or receiving compensation for goods not received or services not performed;
- Authorizing or receiving compensation not earned;
- Conflicts of interest that give rise to a receipt of an unauthorized benefit

Reporting Responsibility:

It is the responsibility of all employees to comply with the Code of Conduct and to report violations or suspected violations in accordance with this Whistleblower Policy.

No Retaliation:

No employee who in good faith reports a violation of the Code shall suffer harassment, retaliation, or adverse employment consequences. An employee or trustee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment or removal from the Board. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within the College prior to seeking resolution outside the College.

Reporting Violations:

The College has an open door policy for employees to share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, an employee's immediate supervisor is in the best position to address an area of concern. However, if you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor's response, you are encouraged to speak with the Director of Human Resources or anyone in management whom you are comfortable in approaching. Supervisors and managers are required to report suspected violations of the Code of Conduct to the College's Director of Human Resources. The Director of Human Resources has specific and exclusive responsibility to investigate or to coordinate investigations of all reported violations. This coordination may include assistance from Finance and Administration, Technology and Library Services, Public Safety and Security, or others, including an outside independent firm, if needed. For suspected fraud, or when you are not comfortable with following the College's open door policy, individuals should use the College's anonymous telephone reporting system which is described in another section of this policy.

Reports made should be factual and contain as much specific information as possible and in writing whenever possible. If the employee making a report to a supervisor does not wish to make it in writing, the oral report should be documented by the supervisor who will provide a copy to the employee for accuracy and completeness. The written report will be forwarded to the Director of Human Resources to initiate the investigation or coordination of efforts.

All allegations will be investigated by the appropriate College official. All College employees are expected to fully cooperate in the investigation of the allegations. The appropriate corrective action, up to and including termination, will be administered if the investigation finds the allegation to be correct.

Good Faith Reports:

Anyone filing a complaint concerning a violation or suspected violation of the College's Code of Conduct must act in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Code.

Anonymous Hotline Reporting System:

Delaware Valley College has established an anonymous telephone reporting system with a third party company. This company provides a means for any unethical, illegal or otherwise improper activities to be reported to the College in a confidential manner so that the situation can be investigated and corrective action taken. This independent company has trained operators available to take employee calls and to initiate a confidential investigation. This service is available 24 hours a day, 7 days a week.

The third party **HOTLINE TELEPHONE NUMBER** is **(800) 620-7406**.

Reports made to the hotline are strictly confidential. Calls are organized by an assigned report number that is given to the caller when the call is placed. This number is also used for callbacks to the system by the caller to answer any follow up questions of the investigator. **There is no way for the College to identify phone numbers or callers.**

After the original call is made, the third party company issues a written report that is sent via email to a predetermined investigator based on the type of issue reported. All reports are copied to the College's Director of Human Resources in order to assure that all reported issues receive thorough and timely investigations.

It is important that the caller provide as much detail as possible in order for a thorough investigation to be conducted. If insufficient information is provided, it may be impossible for the College to determine whether the allegation is true and, therefore, to take appropriate corrective measures.