

Whistleblower Policy

Policy/Procedure

Dickinson College (the “College”) requires all employees to conduct the business of the College in an ethical, honest and legal manner. It is the policy of the College to comply with all applicable federal, state and local laws in the conduct of College business. The purpose of this policy is to establish a procedure for College employees and students to report illegal, fraudulent, unethical or dishonest activity or other misconduct involving the College's financial or business affairs (hereafter referred to as "misconduct") that they might be uncomfortable raising in any other way. If the concern relates to the terms and conditions of employment or enrollment, or is a disciplinary or grievance matter, employees or students should follow the established policies already in place for addressing such situations

Such misconduct may involve an employee, board member, volunteer or outside persons or firms doing business with the College. Examples of misconduct, include but are not limited to, violations of federal, state or local laws, billing for services not performed, theft or inappropriate use of College funds or property, fraudulent financial reporting or other misconduct involving the College's financial or business affairs.

Employee Reporting Process

If an employee or student has knowledge of or concern about misconduct, even if the misconduct involves the President or another member of the Senior Administrative staff, the employee should report the complaint to his/her supervisor or may report his/her complaint using InTouch, an independent third party confidential reporting service. Students may report complaints of misconduct to either the Vice President for Student Life or may report his/her complaint using InTouch, an independent third party confidential reporting service. ***Contact information for InTouch is as follows:***

Website: www.intouchwebsite.com/DickinsonWhistleblowerReporting

Phone: 844-394-2371

Email: DickinsonWhistleblowerReporting@getintouch.com

Complaints of misconduct may be oral or written, including by e-mail or by completing an InTouch on-line form. No particular format is necessary. However, all complaints should include as much information as possible to permit a thorough and complete evaluation of the complaint. This includes material evidence and the names of persons able to corroborate the accusation, if possible. InTouch will assign a case number to the complaint, whether made anonymously or not, through which the status of the matter can be tracked on InTouch’s website. The recipient of a complaint, regardless of whether it is a supervisor, the Vice President for

Student Life, or InTouch, is responsible for ensuring that all information regarding the complaint is properly recorded and thus becomes the formal record of the complaint. (Note: Anonymity or an orally-registered complaint may hinder the ability of the College to investigate the matter in a timely and effective manner.)

Investigation and Role of the President

Unless against the President, notice of all complaints received under this policy will be promptly submitted to the General Counsel (or the Associate Vice President for Human Resource Services if the complaint involves the General Counsel), who is responsible for overseeing the investigation and coordinating corrective actions. The General Counsel (or the Associate Vice President for Human Resource Services if the complaint involves the General Counsel) will determine the level of investigation the complaint warrants and shall perform the investigation. He or she is responsible for determining if the facts support or do not support the complaint and of advising the President.

The President or his or her designee is required to report to the Audit Subcommittee of the Committee on Finance, Budget and Audit of the College's Board of Trustees, regarding compliance with this policy.

For a complaint involving the President, the Chair of the College's Board of Trustees will fill the role of the President and perform the responsibilities identified in the preceding paragraphs.

A person who believes that his or her report of illegal or dishonest activities or other misconduct involving the College's business or financial affairs is not receiving appropriate attention by the President may contact the Chair of the Board of Trustees.

Employee Responsibility

An employee (whistleblower) who makes a complaint must exercise sound judgment and act without malice and in good faith to avoid baseless allegations or frivolous complaints. The whistleblower is not responsible, nor is the whistleblower the appropriate party, for investigating the activity or for determining fault or corrective measures.

Employee Protection

Whistleblower protections are provided in two important areas - confidentiality and protection against adverse action in the form of retaliation.

Insofar as is reasonably possible, the confidentiality of the whistleblower will be maintained. However, at the discretion of the President or the Chair of the Board of Trustees, the whistleblower's identity may have to be disclosed to conduct a thorough investigation or to comply with applicable laws.

The College will not take adverse action against a whistleblower who acts in good faith. Good faith means that a person has reasonable grounds to believe that the reported allegations of misconduct are likely true. Protection from adverse action includes, but is not limited to,

protection from employment action such as termination, compensation decreases, poor work assignments and threats of physical harm. For students, it includes, but is not limited to, protection from adverse action with respect to student status, grading of assignments and tests, housing assignments, student employment and threats of physical harm. Any employee whistleblower who believes he/she is being retaliated against should contact the General Counsel or, in the case of perceived retaliation by the President, the Chair of the College's Board of Trustees should be contacted. Any student whistleblower who believes he/she is being retaliated against should contact the General Counsel or the Vice President for Student Life who will forward any complaints to the General Counsel.

Any employee, however, who does not act in good faith and who knowingly files a false or materially misleading report of misconduct, is not entitled to the protections listed above and is subject to disciplinary action.

Questions

Employees and students with questions regarding this policy should contact the General Counsel.

Related Information

History/Revision Information

Responsible Division/Office: Human Resource Services

Effective Date:

Last Amended Date: September 1, 2016

Next Review Date:

Also Found In: Employee Handbook