

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"), cases of potential child abuse, or any other compliance or conduct issue that they might be uncomfortable raising in any other way.

Such misconduct may involve an employee, student, board member, visitor to campus, 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, academic integrity concerns, fraudulent financial reporting, negligent or reckless behavior directed at a person or property, child abuse, or other unethical or illegal misconduct involving the College's financial or business affairs.

Reporting Process

If an employee or student has knowledge of or concern about misconduct, even if the misconduct involves a Senior Administrator 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. Anyone else who has compliance concerns relating to Dickinson College, regardless of whether or not they are a student or employed by the college, can report their concern to the College by notifying InTouch. ***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 investigator of a complaint 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

Notice of all complaints received under this policy will be promptly submitted to the Director of Enterprise Risk Management, the General Counsel, and the Associate Vice President for Human Resource Services (hereinafter referred to as ‘Triage’), who are collectively responsible for overseeing the investigation and coordinating corrective actions. If a complaint is about or involves a member of the Triage, the person must be recused from having any involvement in the handling of the complaint. The Triage will determine the level of investigation the complaint warrants, which member of Triage will take the lead, and who shall perform the investigation. The investigator is responsible for determining if the facts support or do not support the complaint, and the lead member of Triage will advise the President. For a complaint involving the President, the Chair of the College’s Board of Trustees will be advised by Triage and consulted on how to properly handle the matter.

The President, or 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.

A person who believes that their report of illegal or dishonest activities or other misconduct related to the college is not receiving appropriate attention by the President may contact the Chair of the Board of Trustees.

Individual Responsibility

An employee or student (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 (if the complaint is not submitted anonymously) will be maintained. However, 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 whistleblower

who believes they are being retaliated against should contact the General Counsel or, in the case of perceived retaliation by the General Counsel, the President should be contacted.

Any whistleblower, 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, students, and any other person with questions regarding this policy should contact the General Counsel.

Related Information

History/Revision Information

Responsible Division/Office: Office of General Counsel

Effective Date:

Last Amended Date: April 1, 2019

Next Review Date:

Also Found In: Employee Handbook