



# GOODWIN COLLEGE POLICY

---

TITLE:	Whistleblower Policy
--------	----------------------

**POLICY STATEMENT:** Goodwin College is committed to providing a culture and process that encourages, receives, retains and resolves good faith reporting of known or suspected violations of federal, state or local law, fraud, the misuse or misappropriation of Goodwin College property or authority, or any other wrongful conduct detrimental to Goodwin College by College personnel, in accounting, auditing, or any other activities (collectively "Improper Conduct"). This policy provides a mechanism for College personnel to report such good faith concerns and documents Goodwin College's commitment not to retaliate against personal who raise such concerns.

1. All employees of the College shall follow the Whistleblower Reporting Procedure and report any suspected Improper Conduct to the Provost or Chief Human Resources Officer.
2. All employees of the College shall exercise due care and shall report suspected Improper Conduct in good faith.
3. The College will promptly investigate any reports of Improper Conduct. The Provost or Chief Human Resources Officer shall determine the nature, scope, timing and extent of the investigation. The College is empowered to undertake its own investigation or solicit the assistance of its independent auditors, legal counsel or other resources to investigate suspected Improper Conduct.
4. When appropriate, the College shall take appropriate disciplinary actions and pursue legal remedies available under the law against an employee who has engaged in Improper Conduct, including but not to be limited to, the possibility of termination of employment, restitution, and forwarding information to appropriate authorities for criminal prosecution or other legal remedies.
4. All employees who in good faith report known or suspected Improper Conduct shall be protected from retaliatory actions in accordance with this Policy and with federal and state law.
5. All of the College's assets shall be subject to inspection when the College is investigating reports of Improper Conduct under this Policy. The College shall have full and unlimited access to all of its employees' work product and possessions, including but not limited to office furniture and equipment, electronic devices, digital devices, telephonic devices, and all information stored on said devices, to the extent needed to conduct a thorough and proper investigation.
6. Anyone filing a complaint or raising a concern under this Policy about suspected Improper Conduct must be acting in good faith and have reasonable grounds for believing the allegations of Improper Conduct. Making an allegation that is not substantiated and that proves to have been made maliciously or knowingly to be false is a serious disciplinary

offense and is subject to disciplinary action by the College.

**7. Confidentiality.** Reports of suspected Improper Conductor may be submitted on a confidential basis or anonymously. Reports will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation. The identity of an individual making a report will be kept confidential, except where disclosure of the individual's identity is required by law or extraordinary circumstances otherwise compel such disclosure.

**INCLUDE POLICY STATEMENT (CLICK ON BOX NEXT TO OPTION-SELECT ALL THAT APPLY):**

- COLLEGE CATALOG
- FACULTY/STAFF HANDBOOK
- STUDENT HANDBOOK
- COLLEGE'S POLICY WEB PAGE

**DEFINITIONS:**

**IMPROPER CONDUCT:** Improper conduct includes violations of federal, state, or local law, fraud, the misuse or misappropriation of Goodwin College property or authority, or any other wrongful conduct detrimental to Goodwin College by College personnel, in accounting, auditing, or any other activities.

**Fraud:** Fraud is defined as a willful or deliberate act with the intention of obtaining an unauthorized benefit, such as money or property, by deception or other unethical or illegal means. Fraudulent acts covered under this policy include, but are not limited to:

**Employee:** Employee is defined as any individual who receives compensation, either full or part time, from Goodwin College. In this context, the term also includes any consultant or independent contractor who provides services to the College under a contractual arrangement.

**Whistleblower:** Whistleblower is defined as one who in good faith reports known or suspected Improper Conduct under this Policy.

**CONTACTS:**

Human Resources

**HISTORY:**

Policy created May 2016

<b>EFFECTIVE DATE:</b>	Click here to enter text. This is not the policy creation or approval date. This reflects the date in which the policy becomes effective for the college. For example, some policies may not go into effect until the semester start date following policy approval. In those instances this date will reflect the date of the next semester start.
<b>RESPONSIBLE</b>	Human Resources

<b>OFFICE:</b>	
<b>REVIEW DATE:</b>	Annually (Jan-March).

**APPENDIX:** Include any supporting documentation that would be of use for the interpretation and future evaluation and revision of the policy. Examples include: meeting minutes documenting open forum discussion (arguments for and against, resulting vote), timetables, text of applicable external regulation, etc.