



Whistleblower Policy

Approval Date: May 13, 2010
Approved By: President and Senior Staff

Policy Statement:

Hood College strives to operate in ways which reflect the highest integrity and safety in all operations; and therefore, expects all its trustees, faculty, staff, volunteers, and students to operate in the utmost ethical, honest, and lawful manner while conducting all activities in accordance College policies and federal, state or local laws and regulations. The College strongly encourages all faculty, staff, volunteers, trustees, applicants for employment, and students to report suspected or wrongful conduct by Hood College trustees, faculty, staff, volunteers, or students through the channels that the College has established for such reporting. No Hood College student, volunteer, trustee, faculty or staff member may interfere with the good faith reporting of suspected or actual wrongful conduct; and, no individual who makes such a good faith report shall be subject to retaliation, including harassment or any adverse employment or academic consequence as a result of making a report. It is specifically prohibited to take retaliatory action against any individual with respect to the implementation of any policy or procedure regarding reporting of criminal activity or statistics, and individuals are encouraged to forward information of any kind as related to crime on campus without fear of retaliation. The College will review all good faith reports and take appropriate action to stop and prevent wrongful conduct including that which is harmful to the College's reputation and that put College assets or people at risk, while providing appropriate protection to the whistleblower.

Philosophy:

Hood College has an obligation to protect people, safeguard all assets, protect funds from theft and misappropriation, and to minimize and/or eliminate when possible the risk of improper access or inappropriate utilization of financial and other resources. To that end, the College has developed prudent policies and practices in accordance with generally accepted safety practices, accounting principles and current laws and regulations, including those related to reporting of crimes. In the event that the policies and practices are not being followed, the College should be notified immediately of the suspected noncompliance or fraudulent activity.

It is the intent of the policy to protect any employee, applicant for employment, trustee, volunteer, or student who engages in good faith disclosure of wrongful conduct to a designated College official or public body. Persons reporting suspicious activity or wrongful conduct will be provided appropriate protection from retaliation as outlined in the procedures below.

Procedures:

- A. The following definitions further explain several key phrases contained within this policy. For clarification on any items not listed below, please contact the Office of Human Resources.
1. Whistleblower – An employee, applicant for employment, trustee, student, or volunteer who discloses evidence of wrongful conduct.
 2. Wrongful conduct – A serious violation of College policy or procedures; a violation of applicable state and federal laws; the use of College property, resources, or authority for personal gain or other non college-related purpose; an abuse of authority, gross mismanagement, or gross waste of College money; conduct resulting in substantial and specific danger to public health or safety; or, unethical activities.
 3. Protected Disclosure(s) – Reporting actual or suspected wrongful conduct engaged in by a College trustee, employee, student, volunteer, agent or contractor (who is not also the disclosing individual) based on a good faith and reasonable belief that the conduct has both occurred and is wrongful conduct to a public body, a law enforcement officer, or a Whistleblower Administrator, identified below.
 4. Retaliation – Adverse action, including harassment, intimidation, adverse employment actions such as termination, compensation decreases, or poor work assignments, adverse academic consequences, harassment, intimidation, threats of physical harm, or any other form of retaliation, against a whistleblower because she/he has made a protected disclosure or has participated in an investigation, proceeding or hearing involving a protected disclosure.
 5. Whistleblower Administrator – College official designated to receive and investigate good faith reports of wrongful conduct, investigate the report and determine an appropriate response including corrective activity.
- B. Reporting Suspected Abuse and Other Wrongdoing:
1. As soon as an employee suspects illegal or dishonest activity, he/she should report it immediately to his/her supervisor or the appropriate Whistleblower Administrator(s).
 - a. Provost and Vice President for Academic Affairs – shall receive notifications of student and academic issues.
 - b. Vice President for Finance – shall receive notifications of financial misconduct, fraud, or other business administrative issues.
 - c. Director for Facilities Planning and Special Projects – shall receive notifications of contractor(s), Hood College employee(s), or others who fail to comply with current safety requirements as determined by federal, state and local law or if life and/or health safety issues are a concern at any time or in any Hood College facility/activity.
 - d. Director for Campus Safety and Security – shall receive notifications of any safety incident involving students, staff, volunteers, and faculty, and any concerns regarding reporting of crimes on campus.
 - e. Executive Director of Human Resources – shall receive notifications of issues involving employees and applicants for employment.

- f. Whistleblowers may choose to communicate with any Whistleblower Administrator as appropriate.
2. The Whistleblower Administrator(s) may consult with outside authorities if the situation warrants.
3. Reports of suspected wrongful conduct and reports of retaliation will be investigated promptly and in a manner intended to protect confidentiality. The Whistleblower Administrator who received the report will manage such investigation, and request the assistance of other officers or trustees of the College, or other third parties as he or she deems necessary.

C. Protection of Whistleblower(s):

1. There are two types of Whistleblower Protection.
 - a. Protection of the Whistleblower's Identity – The College will maintain the confidentiality of the whistleblower as reasonably possible. However, the identity of the whistleblower may need to be disclosed during a thorough investigation to comply with the law and to provide the accused individual(s) his/her/their rights of defense.
 - b. Protection from Retaliation – The College will not retaliate against an individual bringing forward the information, nor will it allow any member of the College community to retaliate against the whistleblower.
2. The Whistleblower is not granted immunity for any personal wrongful conduct that is alleged and investigated. A Whistleblower who believes that he/she is being retaliated against must contact the President's Office immediately.

D. Inaccurate Reports or Baseless Allegations:

Employees and/or students are expected to exercise sound judgment to avoid baseless allegations. An employee who intentionally files a false report of wrongful conduct will be subject to disciplinary action up to and including termination.

E. Periodic Review of Internal Controls and Operating Procedures:

Hood College's internal controls and operating procedures are intended to detect, prevent and/or deter improper activities. However, even the best systems of control cannot provide absolute safeguards against irregularities. The College uses an outside auditor to assist in a periodic review of these internal controls and operating procedures.

In the event, that an employee, trustee, student, or volunteer determines that these internal controls and operating procedures are inadequate or that someone is engaged in improper activity, the person is encouraged to come forward in good faith to report his/her concern with the process or the suspected wrongdoing. This is an important part of the College's overall strategy to safeguard people and assets.