

Whistleblower Policy

Policy 40250: Human Resources

1. Purpose

The Germanna Community College Code of Ethics and Conduct (“Code”) requires directors, officers and employees to observe 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 and comply with all applicable laws and regulations.

2. Policy

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

3. Procedures

No director, officer or employee who in good faith reports a violation of the Code shall suffer harassment, retaliation or adverse employment consequence. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. 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.

- 3.1** The Code addresses the College’s open door policy and suggests that employees share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, an employee’s 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 someone in the Human Resources Department or anyone in management whom you are comfortable approaching. Supervisors and managers are required to report suspected violations of the Code of Conduct to the College’s Director of Organizational Planning & Assessment, who has specific and exclusive responsibility to investigate all reported violations. For suspected fraud, or when you are not satisfied or uncomfortable with following the College’s open door policy, individuals should contact the College’s Director of Organizational Planning & Assessment directly.
- 3.2** The College’s Director of Organizational Planning & Assessment is responsible for investigating and resolving all reported complaints and allegations concerning violations of the Code and, at his discretion, shall advise the Vice President of Administrative Services. The College’s Director of Organizational Planning & Assessment is required to report to the Vice President of Finance and Administration annually on compliance activity.
- 3.3 Accounting and Auditing Matters-** The College’s Director of Organizational Planning & Assessment shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The College’s Director of Organizational Planning & Assessment shall immediately notify the Vice President of Administrative Services or the College President of any such complaint and work with Vice President of Finance and Administration or the College President until the matter is resolved.

- 3.4 Handling of Reported Violations-**The Compliance Officer will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.
- 4. Definitions**
- 4.1 Acting in Good Faith-**Anyone filing a complaint concerning a violation or suspected violation of the Code must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Code. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.
- 4.2 Confidentiality-**Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.
- 5. References**
- 6. Point of Contact**
- 7. Approval and revision dates.**

Approved by Presidents Council on 10/20/08