



# Whistleblower Policy

## 1. PURPOSE

This policy establishes the expectations at Northern Pennsylvania Regional College (“NPRC” or the “College”) regarding members of the College community who make good faith reports to appropriate College officials of suspected activities that are dishonest, fraudulent, unethical, illegal, or in violation of any adopted policy within NPRC and protects those individuals from retaliation.

## 2. SCOPE AND APPLICABILITY

This policy is applicable to the College community including, without limitation, all employees, faculty, volunteers, students, Board of Trustees, and representatives of the College.

## 3. REFERENCES

- 3.1 INDX-1110-01: Master Policy Index
- 3.2 CLDR-1110: Policy Review Schedule
- 3.3 INDX-1110-02: Document Naming Key
- 3.4 NPRC-2902: Harassment and Sexual Harassment
- 3.5 NPRC-2104: Non-Discrimination and Non-Harassment
- 3.6 NPRC-2107: Obligation to Report Discrimination or Harassment
- 3.7 NPRC-3235: Behavioral Code of Conduct
- 3.8 NPRC-3311: Instructor Code of Conduct
- 3.9 NPRC-2110: Code of Conduct
- 3.10 NPRC-3225: Academic Code of Conduct for Students
- 3.11 NPRC-2903: Conflict of Interest
- 3.12 NPRC-1105: Conflict of Interest Non-Employee
- 3.13 NPRC-1210: Nondiscrimination
- 3.14 PROC-1065-01: Whistleblower
- 3.15 NPRC-2103: Corrective Action

## **4. DEFINITIONS**

- 4.1 A whistleblower is a person making a protected disclosure concerning wrongdoing.
- 4.2 A protected disclosure is anything reported that the disclosing individual reasonably believes is a violation of any law, regulation, or rule, as well as gross mismanagement or waste of funds, abuse of authority, or a substantial and specific danger to public health or safety.
- 4.3 An Employee shall mean any individual who serves the College in a full-time or part-time capacity as an administrator, staff, or faculty.
- 4.4 Student is any individual enrolled in any course(s) of instruction offered by Northern Pennsylvania Regional College.
- 4.5 To act in good faith means that disclosed information or actions taken are honest and without deliberate intention to deceive another.
- 4.6 Wrongful Conduct is a serious violation of College policy, state and/or federal law, or misusing College property while performing one's duties as defined by the College.
- 4.7 The Executive Committee shall have the same meaning as in the College's Bylaws, and shall include the Chairperson, Vice Chair and Secretary of the College's Board of Trustees, the College President, Divisional Vice Presidents and one or more other members of the Board of Trustees as selected by the Chair.

## **5. POLICY**

- 5.1 Each employee, faculty, student, volunteer, and representative of the College community has an obligation to report activities or suspected activities of dishonesty, fraud, unethical conduct, illegal activity, and/or policy violations.
- 5.2 Anyone who in good faith suspects wrongful conduct and has reasonable grounds for believing the information disclosed is true is encouraged to make a report without fear of retaliation or intimidation.
- 5.3 Making allegations that are proved to be unsubstantiated and made maliciously, recklessly, or with the foreknowledge that allegations are false is a serious offense and may result in discipline in accordance with the relevant Code of Conduct.
- 5.4 The Executive Committee shall address all reports.
- 5.5 Any member of the Executive Committee who is the subject of a report must recuse themselves from the investigation.

- 5.6 No individual should conduct, directly influence, or be involved in any investigative capacity in any inquiry into the activities of their own department or division.
- 5.7 No one who makes a report in good faith, even if the claims are unfounded, shall be subject to retaliation.
- 5.8 Whistleblowers who believe that they have been retaliated against may file a written complaint with the Board Chair.
- 5.9 The complaint of retaliation will be promptly investigated by the Executive Committee and appropriate corrective measures taken if the allegations of retaliation are substantiated.
- 5.10 Anyone who retaliates against someone who has made a report in good faith is subject to discipline in accordance with the relevant Code of Conduct.

## **6. RESPONSIBILITIES AND TIMELINES**

- 6.1 The Executive Committee shall be responsible for investigating and making appropriate recommendations to the Board of Trustees in response to reported actions and providing conclusion to the reporting party within a reasonable time frame as set forth above.
- 6.2 It is the responsibility of the Vice President of Finance and Operations or designee to post this policy in the NPRC office and communicate it to all new staff and board members as part of their on-boarding.
- 6.3 Following the annual election of Board Officers, the Board of Trustees will provide the Vice President of Finance and Operations or designee with new contact information for the Board Chair.
- 6.4 The Vice President of Finance and Operations or designee will be responsible for updating the policy's contact information and redistributing to employees, volunteers, and representatives.

## **7. REVIEW STATEMENT**

Review of this policy will occur in alignment with CLDR-1110: Policy Review Schedule.

## 8. SIGNATURES

*Signature on file*

_____ Chairperson, Board of Trustees <i>Signature on file</i>	_____ Date
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_____ President	_____ Date
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Revision Notes: Policy in Revision