Title

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Whistleblower Policy/Providence College Ethics Line

Purpose

To communicate adherence to the College's policies and procedures, as guided by federal and state regulations, and to encourage good faith reports of allegations of misconduct concerning compliance with College policies and procedures.

Applicability

All Employees

Policy

The College relies on its faculty and staff to perform their duties and responsibilities in accordance with established policies and procedures. The College provides various mechanisms to assist and encourage faculty and staff to come forward in good faith with reports or concerns about suspected compliance issues. Faculty and staff may report such issues without fear of reprisal or retaliation.

Guidelines

1. A faculty or staff member should follow all College policies and procedures in carrying out his/her duties and responsibilities for the College.
2. A faculty or staff member who has a question about the propriety of any practice under College policies and procedures, should seek guidance from his/her supervisor or the College official who has responsibility for overseeing compliance with the particular policy or procedure.
3. A faculty or staff member is encouraged to report suspected improprieties to his/her immediate supervisor. If the individual feels unable to do so, or if there is any reason why this may not be appropriate, the individual should raise the issue with his/her manager, department chair, dean, director, or the College's office or official who has responsibility for overseeing the guidelines below. A faculty or staff member who is unsure as to whom he/she should make a report or address his/her concerns should consult with the Senior Associate Vice President for Human Resources or the College Treasurer.
4. A faculty or staff member may request that such a report be handled as confidentially as possible under the circumstances, and the College will endeavor to handle all such reports with discretion and with due regard for the privacy of the reporting faculty or staff.

5. A faculty or staff member who becomes aware of a potential or actual material violation of College policies or procedures should report such potential or actual conduct, regardless of whether the faculty or staff member is personally involved in the matter. If he/she is not comfortable utilizing standard channels for reporting of any suspected College policy or procedure violation, he/she may make anonymous reports using the Providence College Ethics Line through the EthicsPoint site, either on-line or by telephone using the toll free number of 800-523-5145. The EthicsPoint website is accessed by visiting the Providence College Human Resources – About - homepage. Click on Faculty/Staff, click on Human Resources, then click on Ethics. This will connect directly to the EthicsPoint link. The faculty or staff member may make a confidential, anonymous report either by speaking to an EthicsPoint representative or by using the on-line form.
6. The following general categories represent the topics that may be reported through the EthicsPoint website:

   Financial: Financial, accounting, theft, fraud, donor stewardship or other related issues
   Research: Issues relating to the College's research programs
   Human Resources: Employee misconduct, threat, offensive or inappropriate communication, or other human resources issues
   Athletics: Misuse of assets or endorsements, recruiting misconduct, improper giving, or other issues relating to the College's athletic programs
   Risk and Safety: Non-emergency concerns and issues relating to health, safety, the environment, or other related issues
   Information Technology: Inappropriate use of technology or resources, or other related issues

7. A faculty or staff member may make the anonymous report with the understanding that his/her identity will remain confidential by EthicsPoint.
8. To obtain a full and complete account of relevant and necessary facts, EthicsPoint may ask the individual additional questions or seek clarification as any investigation proceeds.
9. The Audit Committee of the Board of Trustees shall exercise reasonable oversight with regard to implementation and effectiveness, and will be provided with periodic reports on the program's compliance.
10. The Senior Associate Vice President for Human Resources and the College Treasurer, have the authority to assign other individuals to investigate particular issues for which they may have expertise.
11. A faculty or staff member who comes forward in good faith with reports or concerns about compliance with College policies or procedures shall not be subject to reprisal or retaliation for making such a report. Any individual who believes that he/she is being retaliated against for making such a report should immediately bring it to the attention of the Senior Associate Vice President for Human Resources or the College Treasurer, for immediate investigation.
12. Upon completion of an investigation of a reported violation of College policies or procedures, a report of the results will be sent to the Executive Vice President & General Counsel for any further action as needed.
13. *Retaliation*: The College will not tolerate retaliation toward, or harassment of, faculty/staff who report actual or possible violations. The identity of individuals providing information

concerning possible violations, including fraud, will be protected within legal limits. Individuals who take retaliatory action will be subject to discipline, up to and including separation.

14. *Abuse of this Policy*: The College is committed to the protection of both the accused and the accuser in the reporting of any violation of this policy. Therefore, attempts by individuals to discredit others through inappropriate use of this policy are not permitted and may result in disciplinary action.
15. *Protection from Retaliation for Complaining Party and Witnesses*: Federal and state law and College policy prohibit any form of retaliation against a person who files a discrimination complaint, including a charge of sexual harassment. It is the responsibility of the Office of Human Resources, and the Office of the General Counsel to state clearly to the charged party that any form of retaliation against a person for having filed a complaint is expressly prohibited and will result in disciplinary sanctions.
16. *Charged Party – Protection from Bad Faith Complaints*: In the interest of protecting charged parties from bad faith complaints, if the initial investigation reveals that the complaint is malicious or knowingly false, or fundamentally frivolous, such charges will be dismissed and the investigation will be promptly terminated.