



WHISTLEBLOWER POLICY

Cabrini College encourages all faculty, staff, students, and volunteers, acting in good faith, to report suspected or actual wrongful conduct. The College is committed to protecting individuals from interference with making a protected disclosure and from retaliation for having made a protected disclosure or for having refused an illegal order as defined in this policy.

College faculty, staff, students, or volunteers may not retaliate against an individual who has made a protected disclosure or who has refused to obey an illegal order. College faculty, staff, students, or volunteers may not directly or indirectly use or attempt to use the official authority or influence of their positions or offices for the purpose of interfering with the right of an individual to make a protected disclosure to the individual's immediate supervisor or other appropriate administrator or supervisor within the operating department, or other appropriate College official about matters within the scope of this policy.

It is the intention of the College to take whatever action may be needed to prevent and correct activities that violate this policy.

POLICY GUIDELINES

I. Definitions

- A. Wrongful conduct – A serious violation of College policy; a violation of applicable state and federal laws; or the use of College property, resources, or authority for personal gain or other non College-related purpose except as provided under College policy.
- B. Protected disclosure – Communication about actual or suspected wrongful conduct engaged in by a College 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 under applicable law and/or College policy. Individuals who are aware of or have reason to suspect wrongful conduct should report the conduct to:
 - 1. The disclosing individual's supervisor, either verbally or in writing, or
 - 2. Any office listed in this policy under Procedure Section I – Reporting Violations, either verbally or in writing, or
 - 3. The appropriate governmental unit or law enforcement office after first providing a written communication about the wrongful conduct to the appropriate College administrator as identified in Procedure Section I – Reporting Violations of this policy.
- C. Retaliation – Adverse action against an individual because she or he has made a protected disclosure or has participated in an investigation, proceeding or hearing involving a protected disclosure.

II. Intent of Policy

- A. This policy is intended to protect any individual who engages in good faith disclosure of alleged wrongful conduct to a designated College official or public body. More specifically it:
 - 1. Encourages individuals to disclose wrongful conduct engaged in by others to the appropriate College official so that prompt, corrective action can be taken by the College,
 - 2. Informs individuals how allegations of wrongful conduct can be disclosed,
 - 3. Protects individuals from reprisal by adverse employment action or other retaliation as a result of having disclosed wrongful conduct (individuals who self report their own misconduct are not afforded protection by this policy), and
 - 4. Provides individuals who believe they have been subject of reprisal or false allegations a fair process to seek relief from these acts.
- B. Any communication that proves to have been both unsubstantiated and made with malice or with knowledge of its falsity is not protected by this policy. This policy is also intended to protect individuals against false allegations of wrongful misconduct.
- C. Nothing in this policy is intended to interfere with legitimate employment decisions.

III. Regulations

- A. Acting in good faith. Anyone making a protected disclosure or filing a complaint concerning a violation or suspected violation of this policy must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the policy.
- B. False allegation. Any employee or volunteer who knowingly or with reckless disregard for the truth gives false information or knowingly makes a false report of wrongful conduct or subsequent false report of retaliation will be subject to disciplinary action, up to and including termination. Any student who makes false allegations in the non-employment setting will be subject to judicial action. Allegations that are not substantiated yet and made in good faith are not subject to corrective action.
- C. Retaliation. No individual who makes a protected disclosure will suffer harassment, retaliation or adverse employment consequences. Any person who retaliates against any individual who makes a protected disclosure is subject to discipline up to and including termination. 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.
- D. Confidentiality. Protected disclosures may be made on a confidential basis by the complainant or may be submitted anonymously through the College's reporting line. Protected disclosures and investigatory records will be kept confidential to the extent possible and consistent with the need to conduct an adequate investigation.
- E. Handling Protected Disclosures. The Offices (listed in Procedure Section I – Reporting Violations below) receiving the protected disclosure will notify the disclosing individual (if her or his identity is known) and acknowledge receipt of the reported violation or suspected violation within ten (10) working days for most issues and within 24 hours for alleged criminal or environmental violations. All reports will be promptly investigated within 30 calendar days and appropriate corrective action will be taken if warranted by the investigation.

PROCEDURE

I. Reporting Violations

A. Individuals should share their questions, concerns, suggestions or complaints with a College administrator who can address them properly. In many cases the individual's supervisor is in the best position to address an area of concern. If an individual is not comfortable speaking with the supervisor, or is not satisfied with the supervisor's response, individuals should report concerns specific to the following areas by contacting the College's Secure Reporting System via telephone at 888-235-1730 or Internet.

- Academic matters
- Athletic matters
- Employment matters
- Financial and accounting matters
- Information technology matters
- Research matters
- Risk and safety matters

Individuals can file a report anonymously or with full disclosure, as well as track the progress of his/her complaint through this secure system. Reports can be filed by accessing www.cabrini.ethicspoint.com.

B. Individuals can also take their concerns to the offices listed below that will investigate and/or address the concern as appropriate.

1. Academic misconduct matters – Office of Academic Affairs
2. Athletic matters – Office of Athletics and Recreation
3. Criminal matters – Office of Public Safety
4. Employment matters – Office of Human Resources
5. Financial matters – Office of Finance and Administration
6. Legal matters – Office of the President
7. Research matters – Office of Academic Affairs
8. Student matters – All matters involving students, in the non-student employment setting, not covered by the offices listed above – Office of Student Development
9. All other matters – Office of Human Resources

II. Individual Responsibilities

- A. Be knowledgeable about this policy.
- B. Report violations or suspected violations of the policy to the individual's direct supervisor or to the appropriate administrator or office as noted above.

III. Department Responsibilities

- A. Familiarize employees, students, and volunteers with this policy and incorporate into your orientation materials.
- B. Schedule training for leaders, supervisors and managers. Provide training or information on an ongoing basis for faculty, staff, and student employees and volunteers.
- C. Supervisors who receive protected disclosures are required to contact the appropriate offices listed in Procedure Section I – Reporting Violations.

IV. Office of Human Resources Responsibilities

- A. Accept and investigate protected disclosures regarding employment matters.
- B. Accept and investigate complaints of retaliation for making protected disclosures.
- C. Provide training for managers and departments about this policy.
- D. Provide information about this policy during New Hire Orientation and Human Resource Professional training.

V. Office of Finance and Administration Responsibilities

- A. Provide Audit Committee of the Board of Trustees with regular reports of complaint activity.
- B. Ensure complaints are appropriately tracked.

RESOURCES

For consultation:

Office of Human Resources, 610-902-8206
Public Safety, 610-902-8251
Office of Student Development, 610-902-8416
Office of Athletics and Recreation, 610-902-8387
Office of Finance and Administration, 610-902-8276
Office of Academic Affairs, 610-902-8301

For more information:

College Secure Reporting Line at www.cabrini.ethicspoint.com or 888-235-1730