

Whistleblower Policy

General

Saint Mary-of-the-Woods College (SMWC) requires faculty and staff to observe high standards of academic, professional and personal ethics in the conduct of their duties and responsibilities. As representatives of SMWC, all must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility

It is the responsibility of all faculty and staff to comply with their respective handbook policies and to report significant violations or suspected violations of ethical practices in accordance with this Whistleblower Policy.

No Retaliation

No employee who in good faith reports suspected violations of the SMWC policies shall suffer harassment, retaliation or adverse employment consequence. An employee who retaliates against someone who has reported a suspected violation in good faith is subject to discipline up to and including termination of employment. This Whistleblower Policy is intended to encourage and enable staff and others to raise serious concerns within SMWC prior to seeking resolution outside SMWC.

Compliance Officer

The SMWC Director of Human Resources serves as the Compliance Officer. The Compliance Officer is responsible for investigating and resolving all reported complaints and allegations concerning violations of the SMWC policies. Unless the President is an object of the complaint, the Compliance Officer shall immediately advise the President of the reported complaint or allegation. The Compliance Officer has direct access to the President, or in cases involving the President, the Chair of the Board of Trustees, and is required to report to the President at least annually on compliance activity.

Reporting Violations

SMWC encourages faculty and staff to share their questions, concerns, suggestions or complaints with someone who can address them properly. Except in cases in which the employee's supervisor or Cabinet officer is involved, these persons would be in the best position to address the employee's concerns. If the employee is not comfortable speaking with either of them or is not satisfied with the response, the employee is encouraged to speak with another Cabinet officer or the Compliance Officer. Supervisors are required to report suspected violations of policies to their Cabinet officer, who in turn must report these suspected violations to the Compliance Officer. For suspected fraud, or when an employee is not satisfied or is uncomfortable with following this policy, individuals should contact the Compliance Officer directly.

Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violation of SMWC policies must be acting in good faith and have reasonable grounds for believing the information disclosed

indicates a violation. 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.

Confidentiality

Violations or suspected violations must be submitted by the complainant on a confidential basis. Reports of violations or suspected violations must be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Handling of Alleged Violations

The Compliance Officer shall provide in writing to the complainant a receipt of the alleged violation within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

Accounting and Auditing Matters

Unless the Chief Financial Officer or President is an object of a concern or complaint, the Compliance Officer shall also immediately notify them of reported concerns or complaints regarding accounting practices, internal controls or auditing. The Chief Financial Officer and President shall report all such complaints to the Chair of the Audit Committee and be authorized to enlist any appropriate internal or external personnel to investigate such complaints until the matter is resolved.

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