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Daemen College Whistleblower Policy

I. General

Daemen College requires all trustees, officers, volunteers, 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 when fulfilling our responsibilities and comply with all applicable

improper activities; however, even the best systems of control cannot provide absolute safeguards against irregularities. Accordingly, the College has adopted this Whistleblower Policy to provide a mechanism to assist and encourage trustees, officers, volunteers, and employees to come forward in good faith with reports or concerns about suspected compliance issues on a timely basis.

II. Reporting Responsibility

It is the responsibility of all trustees, officers, volunteers, and employees to report suspected financial misconduct. This Whistleblower Policy governs only the reporting and investigation of suspected financial misconduct, such as violations of applicable laws, external regulations, College policy of a financial nature or misuse of College resources. Financial misconduct may include, but is not limited to, ethics violations, fraudulent transactions, conflicts of interest, inappropriate expenditure of funds, questionable internal controls and failure to comply with accounting standards and audit practices, theft or inappropriate use of cash or other College resources, falsification of hours worked for payroll purposes and inappropriate spending of cash through the accounts payable process. The policy is not intended and may not be used for personal or employment grievances, general compensation and benefit complaints, opinions on policy, etc. Such concerns should be pursued in accordance with pertinent policies articulated in employee and student handbooks and as discussed in section X below.

While this policy pertains only to trustees, officers, volunteers, and employees of the College, students with concerns in this regard are encouraged to discuss their concerns with the VP for Student Affairs and Dean of Students, who will determine the most appropriate course of action.

III. Reporting Suspected Violations

Daemen College has an open door policy and encourages trustees, officers, volunteers, and employees to share their questions, concerns, suggestions or complaints regarding any concern with someone who can address them
supervisor, or the head of the affected department or office is in
the best position to address an area of concern.

The College has adopted this Whistleblower Policy for those instances where a person has a serious concern about possible financial or ethical misconduct. The Policy allows allegations to be made outside of the immediate area that the suspected trustee, officer, volunteer or employee is associated with and allows for confidentiality for the reporting person, if requested.

It is recommended that complaints under this Policy be made in person, electronically, or by mail. Employees reporting by campus mail or email should complete a Whistleblower Disclosure Statement (attached below Appendix A) and forward it to the Chair of the Audit Committee of the Board of Trustees (Compliance Officer). Alternatively, the report may be made to the College President, Vice President for Business Affairs (VPBA) or Chair of the Board of Trustees, although all complaints will be forwarded to the Audit Committee Chair as Compliance Officer unless the Chair is the subject of the complaint. Contact information for each of these individuals can be found in Section XI of this Policy.

Every whistleblower should understand that making a report will likely cause an investigation to commence and that he/she may need to visit the office of the Compliance Officer to answer any questions regarding the report.

Complaints may be submitted on an anonymous basis, if the person so desires; however, sufficient information must be provided in order that an investigation can be conducted. Whistleblowers are encouraged to put their names to allegations because appropriate follow-

V. Accounting and Auditing Matters

The Audit Committee of the Board of Trustees shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The Compliance Officer shall immediately notify the Audit Committee of any such complaint and work with the Committee until the matter is resolved.

VI. Results of Reports Made Under Whistleblower Policy

If the investigation establishes that a violation of law, external regulation or College policy has occurred, the Compliance Officer, in conjunction with the appropriate College administrator (President, VPBA, VPAA, the Director of Human Resources and/or the Director of the applicable office of the investigated employee) will determine appropriate action based upon law and College policy. (If as a result of the complaint a faculty member is disciplined, he or she is entitled to a detailed, written explanation of the reasons for the discipline, as noted in Article XII of the Faculty Handbook. If as a result of the complaint a faculty member is suspended or terminated, the faculty member may invoke the review procedures provided for in Article XII of the Faculty Handbook. College staff and students may elect to proceed with the review procedures provided for in the applicable handbook.) Civil or criminal prosecution will be pursued when warranted.

Note that if a whistleblower self-discloses his or her identity directly or indirectly through his or her own actions outside of the official investigation process, the College is not obligated to maintain confidentiality.

VIII. No Retaliation

Employees, trustees, volunteers, and officers of the College may not retaliate against a whistleblower for reporting an activity which that person, in good faith, believes to be financial or ethical misconduct. An action is considered retaliatory if it has the intent or effect of adversely affecting the terms or conditions of the

assignments, or impact on salary or wages. Whistleblowers who believe that they have been retaliated against may file a written complaint with the Compliance Officer or the Vice President for Business Affairs. Any complaint of retaliation will be promptly investigated and, if allegations of retaliation are substantiated, the perpetrator will be subject to discipline up to and including termination of employment/relationship with the College. This protection from retaliation is not intended to prohibit managers or supervisors from taking action, including disciplinary action, in the usual scope of their duties and based on valid performance-

Crime Reporting Policy

Daemen College strives to maintain a safe campus and relies on all members of the campus community to do their part to keep our campus safe. Any member of the campus community faculty, student, staf(f)101,0

[Biosafety-2-2005.pdf](#). Potentially hazardous chemical issues should be handled according to the College Chemical Hygiene Plan <http://www.daemen.edu/offices/securityoffice/Documents/Daemen-CHP-22005.pdf>.

Data Security

In the event of knowledge regarding the improper use of electronic resources including: computer hardware; computer network and servers; software; data, voice, cable or other related wired or wireless signals of information;

Policy, a report should be made to the Director of Academic Computing Services or Director of Information Resources Management.

XI. Contacts

