

	POLICY	Motion No.	EXEC 1003-2021
	Whistleblower Policy	Effective Date	02/16/2021
		Responsible Department	Human Resources
		Attorney Review / Date	[Attorney Name] [Date]

SCOPE

The purpose of this policy is to deter and detect fraud or other illegal or unethical activity by establishing a confidential channel of communication by which employees can report activity that they reasonably consider to be illegal, dishonest, or in violation of College policies.

POLICY

Pennsylvania Highlands Community College is committed to the highest ethical standards and conducts its operations in compliance with federal and state laws and regulations and Board policy. As such, the College encourages employees to report allegations of internal wrongdoing and provides assurance they will be protected from retaliation if reported in good faith.

Wrongdoing may include, but is not limited to, the following: crimes or violations of the law or governmental regulations; purposeful violation of Board policy, fraud or financial irregularity; improper use of College funds, property, or assets; corruption, bribery, or blackmail; and harming College property.

Anyone filing a whistleblower report must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. This policy is not intended and should not be used for personal grievances. Allegations that prove to have been made maliciously or knowingly to be false will be viewed as a serious offense subject to discipline up to and including dismissal from employment.

The College will promptly investigate reports of possible internal wrongdoing and will take appropriate action against any employee found to have engaged in fraudulent or dishonest conduct. Appropriate action may include disciplinary action by the College and/or civil and criminal prosecution.

Parties interested in filing a whistleblower complaint should recognize that:

1. The information on how to file a whistleblower report can be found in the College's intranet and employee handbook.
2. The report should contain sufficient and detailed information so that an investigation can be conducted into the allegations.
3. Concerns may be submitted anonymously if the employee feels that it is the only way he or she can disclose the information safely. However, he or she is encouraged to reveal his or her identify so that an appropriate investigation can be conducted including follow-up questions. Anonymous whistleblowers must provide sufficient corroborating evidence to justify the commencement of an investigation. An investigation of

unspecified wrongdoing or broad allegations will not be undertaken without verifiable evidentiary support.

4. Whistleblower reports will be forwarded to the College President, the Chairperson of the Board of Trustees, and the chief human resources officer.
5. Reports and investigations will be kept confidential to the extent allowed by the circumstances and law. In general, whistleblower complaints will only be shared with those who have a need to know so that the College can conduct an effective investigation, determine what action is to be taken, if any, and, in appropriate cases, contact law enforcement personnel.
6. Should disciplinary or legal action be taken against a person or persons as a result of a whistleblower complaint, such persons may also have the right to know the identity of the whistleblower.
7. An employee who in good faith reports a suspected violation of law or College policy shall not suffer harassment, retaliation, or adverse employment consequence from other employees or the College. 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. Whistleblowers who believe they have been retaliated against may file a written complaint with the chief human resources officer, the College President, and the Chairperson of the Board.

Effective Date	Motion Number	Document Author	Description of Change
02/16/2021	EXEC 1003-2021	HR/President's Office	Complete policy revision
05/06/16			Title Change
6/25/2013	EXEC 1009-2013	Human Resources	Initial Release