Allegany College of Maryland
WHISTLEBLOWER POLICY

Adopted date 03/2020
Approved by Board of Trustees 03/2020
Implementation Date 03/2020
Type of Policy Operational

BACKGROUND AND PURPOSE

Allegany College of Maryland requires its employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the Allegany College of Maryland, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

POLICY

I. Scope of the Policy

This whistleblower policy is intended to encourage and enable Allegany College of Maryland employees, volunteers, or persons professionally affiliated with the College to raise serious concerns internally so that the College can address and correct inappropriate conduct and actions.

The Allegany College of Maryland encourages its employees and volunteers to submit complaints or reports about suspected illegal practices, serious violations of institutional policy, and/or violations of governmental regulations by the organization itself, its leadership, its other employees, third parties working on its behalf or under its control.

Employees are encouraged to report good faith concerns about matters, including but not limited to:

- violations of any law, regulation or College policy
- discrimination, harassment, or sexual misconduct
- misuse of College property or resources, or misuse of grant money
- fraud or financial improprieties, including accounting or audit matters
- embezzlement or theft
- conspiring with or coercing another to engage in such behaviors

Before submitting a complaint or report, the person must make a reasonable attempt to ascertain the accuracy of any information being reported.

The College provides multiple methods for submitting a complaint or report:

a. An employee is encouraged to make reports to their immediate supervisor. If the employee feels unable to do so, the employee should report the issue to the next level supervisor, the Dean, Vice-President or the Human Resources Office; or
b. An employee may follow the process outlined in other appropriate policies which have reporting components; or
c. An employee may file a report with the College's third-party ethics and compliance hotline provider. Information about how to file a report will be provided to employees, volunteers, and persons professionally affiliated with the College. Every effort will be made to protect

the reporter's identity by our hotline vendor. Please note that the information provided in a hotline report may be the basis of an internal and/or external investigation by the College into the issue being reported. It is possible that as a result of the information provided in a report the reporter's identity may become known to us during the course of our investigation.

II. No Retaliation

It is contrary to the values of the Allegany College of Maryland for anyone to retaliate against any employee, volunteer, or person professionally affiliated with the College who submits a complaint or report, who participates in any resulting investigation, or who conducts an investigation. An employee who engages in retaliation is subject to discipline up to and including termination.

III. Acting in Good Faith

Anyone filing a report concerning a violation or suspected violation 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.

IV. Reporting Procedure

Reporting employees must make a reasonable attempt to ascertain the correctness of any information the employee reports. For reports involving illegal practices or serious violations of law, regulations and policy:

1. An employee is encouraged to make reports to their immediate supervisor. If the employee feels unable to do so, the employee should report the issue to the next level supervisor, the Dean, Vice-President or the Human Resources Office; or
2. An employee may follow the process outlined in the appropriate policy for suspected violations for discrimination, harassment, or sexual misconduct; or
3. An employee may file a report with the College's third-party ethics and compliance hotline provider. Every effort will be made to protect the reporter's identity by our hotline vendor. Please note that the information provided in a hotline report may be the basis of an internal and/or external investigation by the College into the issue being reported. It is possible that as a result of the information provided in a report the reporter's identity may become known to us during the course of our investigation.

   Reports can be made 24 hours a day/7 days a week either by:

   - Website: www.lighthouse-services.com/allegany
   - (877) 690-0002
   - Email reports to: reports@lighthouse-services.com (include ACM name with report)
   - Fax: 215-689-3885 (include ACM name with report)

V. Confidentiality

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

Disclosure of information related to the complaint/report or investigation to individuals not involved in the investigation will be viewed as a serious disciplinary offense.

VI. Institutional Action

Each complaint or report will be addressed by the College. The action taken will depend on the nature of the concern. Reports received by the hotline vendor will be distributed to the applicable department or investigator in a timely manner. Initial inquiries will be made to determine whether an investigation is appropriate and the form that it should take. Some concerns may be resolved by agreed upon action without the need for an investigation.

Whether reported directly to a supervisor, another College official, or through the hotline, the individual submitting a complaint or report will be given the opportunity to receive acknowledgement that the information was received and information describing the next steps.

The amount of contact between the individual submitting a report and the body investigating the concern will depend on the nature of the issue, the clarity of information provided, and whether the employee remains accessible for follow-up. Further information may be sought from the person who submitted the complaint/report.

At the discretion of the College and subject to legal and other constraints, the person who submitted the complaint/report may or may not be entitled to receive information about the outcome of an investigation.

VII. Changes

Substantive changes to this policy require approval by the Board of Trustees; editorial changes, title/position changes, and/or changes to its implementation procedures may be made as required by federal or state mandate and/or institutional need with timely notice to students and employees.