



# SUNY Orange Policy Manual

Policy Number	Policy Title
BP2.26	Whistleblower

All employees of Orange County Community College sign a document upon employment acknowledging receipt of a copy of the College's Code of Ethics. Employees of the College must perform honestly and with integrity in fulfilling their official responsibilities and complying with all applicable laws and regulations.

It is the responsibility of all officers and employees of the College to comply with the Code and to report violations or suspected violations in accordance with this Whistleblower Policy.

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

The College maintains an open door policy and suggests that employees share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, an employee's supervisor is in the best position to address an area of concern. However, if an employee is not comfortable speaking with his or her supervisor or is not satisfied with the supervisor's response, such employee is encouraged to speak with someone in the Human Resources Department or anyone in management with whom the employee feels comfortable in approaching. Supervisors and managers are required to report suspected violations of the Code to the College's Compliance Officer, who has specific and exclusive responsibility to investigate all reported violations. For suspected fraud, or when the forthcoming employee is not satisfied or uncomfortable with the open door policy, the College's Compliance Officer should be contacted directly.

The College's Compliance Officer is responsible for investigating and resolving all reported complaints and allegations concerning violations of the Code and, at the Officer's discretion, shall advise the President and the audit committee. The Compliance Officer has direct access to the budget and audit committee of the Board of Trustees and is required to report to the budget and audit committee at least annually on compliance activity. The College's Compliance Officer is the Vice President for Administration. If the forthcoming employee is not comfortable speaking with the Compliance Officer or if the Officer is not available and the matter is urgent, the forthcoming employee may contact the Chair of the Board's Audit Committee, and can obtain his/her phone number from the Office of the President of the College.

The Audit Committee of the Board of Trustees shall address all reported concerns or complaints regarding college 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.



## SUNY Orange Policy Manual

Policy Number	Policy Title
BP2.26	Whistleblower (cont.)

Anyone filing a complaint concerning a violation or suspected violation of the Code 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.

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

The Compliance Officer will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

The Board of Trustees directs the President to develop such procedures as to fairly implement this policy.