

## **Suffolk County Community College Association, Inc. Whistleblower Policy**

### **Introduction**

All employees of Suffolk Community College Association, Inc. must practice honestly and with integrity in fulfilling their responsibilities and complying with all applicable laws and regulations.

### **Reporting Responsibility**

It is the responsibility of all officers and employees of the Association to comply with the Association's Code of Professional Ethics (Code) and to report violations or suspected violations in accordance with this Whistleblower Policy.

### **No Retaliation**

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 Association rather than seeking resolution outside the Association.

### **Reporting Violations**

The Association 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 supervisors' response, such employee is encouraged to speak with the Association's Director of Business Affairs or the college Associate Dean of Student Affairs. Supervisors and managers are required to report suspected violations of the Code to the Association'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 Association's compliance Officer should be contacted directly.

## **Compliance Officer**

The Suffolk Community College Association'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 Board of Directors. The Compliance Officer has direct access to the Board of Directors and is required to report to the Board at least annually on compliance activity. The Association's Compliance Officer is the College Dean of Students. 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 of Directors and can obtain his or her phone number from the Director of the Association.

## **Accounting and Auditing Matters**

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

## **Acting in Good Faith**

Anyone filing a complaint concerning a violation of 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.

## **Confidentiality**

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.

## **Handling or Reported Violations**

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.