



## SUNY Orange Policies and Procedures

Policy Number	Policy Title
<b>BP2.25</b>	<b>Whistleblower Policy</b>

It is the policy of Orange County Community College that all members of the College community shall comply with College's Code of Professional Ethics (BP2.26), policies, procedures and applicable law; practice honesty and integrity in fulfilling their responsibilities; observe high standards of business and personal ethics in the conduct of their duties and responsibilities; help ensure the prevention and detection of fraud and irregularities; be familiar with the types of fraud and irregularities that might occur in their area; be alert for any indication that fraud or irregularities might exist in their area; and promptly report any known or suspected fraud or irregularities involving the college or affiliated entity funds, resources, property, or employees.

Fraud and irregularities include activities that are: a misappropriation of assets; in violation of or non-compliant with any College policy or procedure or any New York State or federal law; economically wasteful; an indication of gross misconduct or incompetency; or an unethical, improper, or dishonest act.

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 a 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 and Finance. 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 & Finance Committee, and can obtain the appropriate contact's phone number from the Office of the College President.

The Audit & Finance 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 & Finance Committee of any such complaint and work with the committee until the matter is resolved.

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



## **SUNY Orange Policies and Procedures**

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.

It is the responsibility of all officers and employees of the College to comply with the Code of Ethics and to report violations or suspected violations in accordance with this Whistleblower Policy. Officers and employees who lawfully report suspected fraud, waste, or abuse shall not suffer discharge, demotion, suspension, threats, harassment, discrimination, or other forms of retaliation for making such reports in good faith.

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

Amended: Jan. 19, 2022