Whistleblower Policy

Purpose and Applicability

The purpose of this policy is to set forth procedures under which an employee of Virginia Wesleyan College can report suspected unlawful and/or unethical behavior by an employee or official of the College and be protected against retaliation in the form of an adverse employment action.

Statement of Policy

Virginia Wesleyan College expects its employees and officials to perform their duties in accordance with applicable federal, state, and local laws and regulations, College policies, and the highest ethical standards. At the same time, the College recognizes that improper conduct, whether intended or not, may occur. The College, therefore, encourages each employee to report any illegal or unethical conduct by an employee or official of the College. Such conduct may include, but is not limited to, the following kinds of activities:

- Forgery or alteration of documents
- Questionable accounting and internal controls
- Unethical business practices
- Unauthorized alteration or manipulation of computer files
- Fraudulent financial reporting
- Misappropriation or misuse of College resources, including funds, supplies, or other assets
- Authorization or receipt of compensation for services not received or not performed, or hours not worked

Reporting Improper Activities

Virginia Wesleyan College has a responsibility to investigate and report to appropriate parties allegations of suspected improper activities and to report the actions taken by the College. Any allegations of improper activities that may result in subsequent actions bringing disciplinary charges against a faculty or staff member shall be coordinated with the applicable faculty or staff personnel conduct and disciplinary policies.
1. All employees are encouraged to report possible improper activities to his or her immediate supervisor or department head or, in the case of faculty, to the Dean of the College.

2. In the event that any person with a reporting obligation under this policy believes that there is a conflict of interest on the part of the person to whom the allegations of suspected improper activities are to be reported, the next higher level of authority shall be contacted.

3. In the event the employee is uncomfortable reporting the alleged matter to the above referenced parties, the employee may instead contact the Campus Hotline service by calling 757-493-2160. This is a secure voice mail system that will be received by the Director of Human Resources. The Chairperson of the Board of Trustees Audit Committee will also receive an e-mail notification of the received voice mail message.

4. Upon receipt of such, either directly or as received through the Campus Hotline, the Director of Human Resources shall consider the disclosure and take whatever action is determined to be appropriate under College policies, the law and the circumstances of the disclosure.

5. In the case of disclosure alleging misconduct by the President, the disclosure shall be directed to the Chairperson of the Virginia Wesleyan College Board of Trustees.

6. The disclosure recipient will be responsible for:

   a. Ensuring all investigations are carried out in a fair and unbiased manner
   b. Ensuring that those making complaints and/or reporting compliance concerns are treated fairly, their confidentiality is protected to the extent the law allows, and no retaliation takes place.

Employees reporting suspected improper activities may do so orally, but they are encouraged to make such reports in writing so as to assure a clear understanding of the issues raised. Written allegations of suspected improper activities should include the following information:

1. The name, address and position of the complainant
2. The name and title of the VWC employee or official against whom the complaint is made
3. A detailed description of the time, place(s), and manner in which the misconduct occurred along with a reference to any records that might document the misconduct

Process for Disclosure

The disclosure recipient shall handle the matter in accordance with the relevant policies of Virginia Wesleyan College in a fair and unbiased manner.

To ensure that the Whistleblower Policy is being adequately enforced, the Director of Human Resources shall prepare and submit to the Chairperson of the Board of Trustees Audit Committee a report on the number of complaints submitted, the disposition of the complaints, and an account of significant actions undertaken as the result of meritorious complaints. The Audit Committee may use this information to identify important trends.
requiring further consideration outside of the policy, but important to best practices of Virginia Wesleyan College.

Complaints of Retaliation as a Result of Disclosure

If an employee believes that he or she has been retaliated against in the form of adverse employment action for reporting possible misconduct under this policy, he or she may file a written complaint requesting an appropriate remedy. An employee who reports suspected improper activities and who believes that he or she has been retaliated against may file a written complaint with the Director of Human Resources.

For purposes of this policy, an adverse employment action shall be defined as actions including: discharge, demotion, suspension, being threatened or harassed, or in any other manner discriminated against with respect to compensation, terms, conditions or privileges of employment. This policy does not prohibit an employment action that would have been taken regardless of a disclosure of information.

An employee who knowingly makes false allegations of alleged wrongful conduct shall be subject to discipline, up to and including termination of employment, in accordance with College rules, policies and procedures.