Northwest State Community College Foundation
WHISTLEBLOWER POLICY

I. GENERAL
The Northwest State Community College Foundation (the Foundation) is committed to maintaining the highest standards of conduct and ethical behavior and promote a working environment that values respect, fairness and integrity. Therefore, as members of the Board of Directors, Officers and Staff of the Foundation, they are expected to practice honesty, integrity and openness in fulfilling their responsibilities and complying with all applicable laws and regulations.

This Whistleblower Policy is in place to protect the individual who reports or provides evidence of wrongdoing. This policy informs all parties involved that retaliation against or harassment of a whistleblower will not be tolerated, and may have negative consequences.

II. DEFINITIONS

Whistleblower:
An individual who informs the Foundation Chair, Foundation Director or College President about an activity relating to the Foundation which that person believes to be fraudulent or dishonest.

Fraudulent or Dishonest Conduct:
A deliberate act or failure to act with the intention of obtaining an unauthorized benefit. Examples of such conduct include, but are not limited to:

1. forgery or alteration of documents
2. unauthorized alteration or manipulation of computer files
3. fraudulent financial reporting
4. violation of the Foundation’s Conflict of Interest Policy
5. misappropriation or misuse of the Foundation’s funds, supplies, or other assets
6. engaging in conduct that violates state or federal laws, regulations or rules
7. refusing to comply with relevant statutes or guidelines
8. covering up wrongdoing

Baseless Allegations:
Allegations made with reckless disregard for their truth or falsity. People making such allegations may be subject to disciplinary action by the Foundation and/or legal claims by individuals accused of such conduct.

III. REPORTING WRONGFUL CONDUCT
It is the responsibility of all Directors, Officers and Staff of the Foundation to report “Wrongful Conduct” according to this Whistleblower Policy.

A person suspecting possible fraudulent or dishonest use or misuse of resources or property should report their concerns directly to the Foundation Chair, Foundation Director or College
President for determination of due process. Alternately, where the Whistleblower wishes to remain anonymous, a written statement may be submitted to one of the individuals listed above.

The person reporting suspected “Wrongful Conduct” should not discuss the case with anyone other than the Foundation Chair, Foundation Director, College President, Foundations legal counsel, or a duly authorized law enforcement officer. The reporter should not contact the person suspected to further investigate the matter or demand restitution.

IV. RIGHTS OF THE ACCUSED

Reasonable care should be taken in dealing with suspected misconduct to avoid: baseless allegations, premature notice to persons suspected of misconduct and/or disclosure of suspected misconduct to others not involved with the investigation, and/or violations of a person's rights under the law.

Accordingly, an individual faced with a suspected misconduct should not discuss the case with anyone other than the Foundation Chair, Foundation Director, College President or legal counsel, or a duly authorized law enforcement officer.

V. NO RETALIATION

No individual who in good faith reports Wrongful Conduct will suffer harassment, retaliation, or adverse employment consequence. Any representative of the Foundation (director, officer or staff) who retaliates against anyone who has reported Wrongful Conduct in good faith is subject to removal from the Foundation Board of Directors.

This Whistleblower Policy is intended to encourage and enable individuals to raise serious concerns within the Foundation before seeking resolution outside the organization.

VI. ACTING IN GOOD FAITH

Anyone filing a complaint of Wrongful Conduct must act in good faith and have reasonable grounds for believing the information disclosed indicates Wrongful Conduct. Any allegations that prove not to be documented and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

VII. CONFIDENTIALITY

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

VII. HANDLING OF REPORTED WRONGFUL CONDUCT

Suspected Wrongful Conduct will be reviewed and analyzed with documentation of the receipt, retention, investigation and treatment of the complaint. All reports will be promptly investigated. Cases may warrant investigation by an independent person such as auditors and/or attorneys.

The Foundation Chair, Foundation Director or College President will promptly notify the sender and acknowledge receipt of the reported Wrongful Conduct or suspected Wrongful Conduct, unless such report was submitted anonymously.

Northwest State Community College Foundation
WHISTLEBLOWER POLICY STATEMENT

My signature below indicates my receipt and understanding of this whistleblower policy. I verify that I have been provided with an opportunity to ask questions about the policy.

_______________________________________  _____________
Signature                              Date

REVISION RECORD:
Rev. A. JUNE 30, 2011