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|  <b>Prescott College</b> | <b>Policy Number:</b> 110                                                                                                                             |                                                |
|                                                                                                           | <b>Policy Category:</b> Governance Policies                                                                                                           |                                                |
|                                                                                                           | <b>Whistleblower</b>                                                                                                                                  |                                                |
|                                                                                                           | <b>Policy Summary:</b><br><i>This policy provides for the structure for the campus community to report potential violations of laws and policies.</i> |                                                |
|                                                                                                           | <b>Approval Date:</b><br><i>October 4, 2024</i>                                                                                                       | <b>Effective Date:</b><br><i>Upon approval</i> |
| <b>Policy Owner:</b><br><i>Board of Trustees</i>                                                          | <b>Scheduled for Review:</b><br><i>Spring 2029</i>                                                                                                    |                                                |

### Policy Statement

Employees, students and others are encouraged to raise serious concerns relating to the violations of relevant laws that govern Prescott College operations or the College’s Ethics – Conflict of Interest policy (804) so that Prescott College can address and correct those violations. All members of the college community are responsible for reporting such violations.

A whistleblower is defined as an employee or student of Prescott College who reports an activity that he/she considers to be a violation of laws that govern Prescott College operations, or that violate the College’s Ethics – Conflict of Interest policy 804.0. The whistleblower is not responsible for investigating the activity or for determining fault or corrective measures; appropriate management officials are charged with these responsibilities.

Examples of illegal or dishonest activities are violations of federal, state or local laws; billing for services not performed or for goods not delivered; and other fraudulent financial reporting. Additionally, please refer to the Ethics-Conflict of Interest policy 804.0.

Whistleblower protections are provided in two important areas -- confidentiality and against retaliation. Insofar as possible, the confidentiality of the whistleblower will be maintained. However, identity may have to be disclosed to conduct a thorough investigation, to comply with the law and to provide accused individuals their legal rights of defense. The College will not retaliate against a whistleblower. This includes, but is not limited to, protection from retaliation in the form of adverse academic or employment actions such as expulsion, suspension, termination, compensation decrease, or poor work assignment and threat of physical harm.

The employee or student must exercise sound judgment to avoid baseless allegations. An employee or student who intentionally files a false report of wrongdoing will be subject to discipline up to and including termination or expulsion. The right of a whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated.

Employees or students with any questions regarding this policy should contact the Director of Human Resources.

### Reason for Policy

To encourage and protect individuals that come forward as whistleblowers.

### Responsibilities

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|-----------------------------------------|----------------------------|
| For following policy:                   | All employees and students |
| For enforcement of policy:              | Director, Human Resources  |
| For oversight of policy:                | President                  |
| For procedures implementing the policy: | Director, Human Resources  |
| For notification:                       | Policy Librarian           |

### Procedures

**If an employee or student has knowledge of or a concern relating to possible violations of laws or policy as defined above, the employee or student is to contact the Director of Human Resources or report to the Board of Trustees Audit Committee Chair through the CONFIDENTIAL fraud hotline (fraudhotline@prescott.edu).**

Whistleblower protection is additionally afforded to an employee or student who refuses to obey an illegal order given by the College, including College directors or faculty. If an employee or student has concern that he or she has been asked to follow an illegal order, the employee or student should refuse to do so and contact the Director of Human Resources or report Board of Trustees Audit Committee Chair through the fraud hotline (fraudhotline@prescott.edu).

Any whistleblower who believes he/she is being retaliated against must contact the Director of Human Resources or the Board of Trustees Audit Committee Chair through the fraud hotline (fraudhotline@prescott.edu) immediately. Whistleblower retaliation complaints should be promptly submitted to the Director of Human Resources, who is responsible for investigating and coordinating corrective action. The complainant should disclose in the complaint at a minimum, (a) the adverse action(s) taken against the complainant by the College; (b) identities of the person(s) to whom each protected disclosure was made; (c) the date(s) upon which each protected disclosure was made; and (d) a description of how each protected disclosure was communicated. If the complaint is based upon retaliation for refusing to obey an illegal order, the complaint should (a) describe the illegal order; (b) identify the College employee(s) who gave the illegal order; (c) specify the date or approximate date on which the illegal was given; and (d) describe what the complainant did in response to the illegal order.

### Revision History

Policy updated to include fraud hotline – 04/22/24

Procedures updated to change reporting to Audit Committee Chair – 10/04/24