

SPRINGFIELD COLLEGE

WHISTLEBLOWER POLICY

I. Purpose:

The purpose of this Whistleblower Policy (the “Policy”) is to encourage and enable good-faith reports by employees and students of Springfield College (the “College”) and others (including Trustees of the College and third parties) of observed or suspected misconduct or noncompliance with College policies or applicable laws and regulations (such misconduct and noncompliance hereinafter referred to as “Misconduct”).

II. Scope:

This Policy is intended to encourage and enable employees, students, and others who have good-faith concerns about Misconduct to raise them with the College to facilitate the internal correction of inappropriate conduct and actions. This Policy is not intended to supersede any existing College policies addressing Misconduct, nor does it affect any rights, responsibilities, or procedures set forth in other College policies addressing Misconduct. For example, complaints regarding discrimination or harassment, other personnel and employment matters, academic and disciplinary matters, research misconduct, or other matters with applicable College policies should ordinarily be made according to the College policies and laws relevant to such matters.

III. Reporting Misconduct:

Each member of the College community shares responsibility for stewardship of College resources and compliance with College policies and applicable laws and is expected to observe high standards of ethics in the conduct of their duties and responsibilities. Therefore, employees, students, and others are encouraged to report any Misconduct that may result in financial loss or other harm to the College. The employee, student, or other person making a report of Misconduct pursuant to this Policy is hereinafter referred to as the “Reporting Person.”

Misconduct reporting procedures are detailed in section VI, below. In addition, an employee or student who has a question about the propriety of any practice under College policies or applicable laws should seek guidance from his or her supervisor or a College official with compliance oversight responsibility for the particular policy or area. An employee, student, or other person may also seek guidance from the College’s Internal Auditor, Vice President & General Counsel, or Vice President for Finance & Administration.

IV. Confidentiality:

The College will endeavor to handle all reports of Misconduct as confidentially as possible under the circumstances. However, other obligations and considerations may preclude the College from maintaining confidentiality in all circumstances. The College will also use its best efforts to protect the identity of the Reporting Person, but cannot guarantee such nondisclosure if the identification of the Reporting Person is necessary to College or law enforcement officials for the purposes of investigating the Misconduct.

V. Anonymous Reports:

A Reporting Person may make an anonymous report of Misconduct, but the College's investigation of an anonymous report of Misconduct may be hampered or impracticable if the employee, student, or other person cannot be identified and questioned about the allegations and related facts.

VI. Persons to Whom Reports May Be Made:

- Employees should report Misconduct to their immediate supervisor.
- Faculty should report Misconduct to their Dean or the Provost.
- Students should report Misconduct to the Vice President for Student Affairs or to the Dean of Students.
- Trustees of the College should report Misconduct to the College's President or the Chair of the Audit & Compliance Committee of the College's Board of Trustees.
- Other persons should report Misconduct to the Internal Auditor, Vice President & General Counsel or Vice President for Finance & Administration.

If the Reporting Person believes that a potential conflict of interest exists with the reporting venues identified above or the Reporting Person is not satisfied with the response received from the reporting venues identified above, such Reporting Person may make a report of Misconduct to the College's Internal Auditor, Vice President & General Counsel, or the Vice President for Finance & Administration. In the event the Reporting Person believes that a potential conflict of interest also exists with all three of those individuals, such Reporting Person may make a report of Misconduct to the Chair of the Audit & Compliance Committee of the College's Board of Trustees. The report to the Chair of the Audit & Compliance Committee must be made in writing and submitted in a sealed envelope marked "personal & confidential" to the Office of the College's President for forwarding to the Chair.

Reports should be made in writing to provide for a clear understanding of the issues and concerns raised, but may be made orally.

VII. No Retaliation:

The College prohibits retaliation against a person making a good-faith report of Misconduct. An employee, student, or Trustee who retaliates against someone who has made a good-faith report of Misconduct is subject to disciplinary action, which may include termination of employment, expulsion of student, or removal from the Board. Reporting Persons who believe that they have suffered retaliation in violation of this Policy may report such retaliation to the College's Internal Auditor, Vice President & General Counsel, or the Vice President for Finance & Administration. In the event the Reporting Person believes that a potential conflict of interest exists with all three of those individuals, such Reporting Person may make a report of retaliation to the Chair of the Audit & Compliance Committee of the College's Board of Trustees using the procedure outlined above.

VIII. Baseless Claims:

A baseless claim results when an allegation is made in bad faith, with knowledge of its falsity, or with reckless disregard for its truth or falsity (hereinafter referred to as a "Baseless Claim"). A Reporting Person who makes a Baseless Claim of Misconduct may be subject to disciplinary action by the College, which may include termination of employment, expulsion of student, removal from the Board, and/or

legal recourse by the College or individuals who are falsely accused. Reporting Persons are expected to read and understand the College's policies in order to avoid Baseless Claims.

IX. Tracking of Reports:

The Internal Auditor shall maintain a log of all reports under this Policy received by the Internal Auditor, Vice President & General Counsel and Vice President for Finance & Administration.

X. Contact Information:

<i>Internal Auditor</i>	<i>VP & General Counsel</i>	<i>VP for Finance & Administration</i>
Katherine O'Connor	Linda (Elle) Morgan, Esq.	John L. Mailhot
Administration Building	Marsh Memorial Building	Administration Building
PH: 413-748-3640	PH: 413-748-3271	PH: 413-748-3145
koconnor3@springfieldcollege.edu	ellemorgan@springfieldcollege.edu	jmailhot@springfieldcollege.edu

Anonymous reporting line: 1-413-748-4411; internally extension 4411.

Approved by: President and Cabinet (April 13, 2015)
Board of Trustees, Audit & Compliance Committee (April 29, 2015)
Board of Trustees, Executive Committee (April 29, 2015)

Date Effective: April 30, 2015

Administrative Revisions: March 20, 2017 (added anonymous reporting line information; updated name of the School of Professional & Continuing Studies)

December 6, 2019 (updated contact information and title references throughout; updated persons to whom reports may be made for students so that all students will now report Misconduct to the Vice President for Student Affairs or to the Dean of Students)