WHISTLEBLOWER POLICY

I. <u>Introduction</u>

The Community College of Philadelphia is committed to maintaining an environment of respect and trust consistent with the College's Mission Statement. In addition, the College is committed to complying with all laws and regulations applicable to it, and the College relies upon its employees to perform their duties in accordance with the College's policies and procedures. The College's internal controls and policies and procedures are intended to prevent and detect improper activities. The College encourages good faith reports by College employees and others of observed or suspected misconduct, waste, or noncompliance with law, regulations or College policies.

This Whistleblower Policy is designed to encourage and enable College employees and others who have good faith serious concerns about misconduct, including violations of law, regulations or College policies and procedures, to report their concerns. This Policy is not intended to supplant existing College policies. Thus, complaints or grievances such as those regarding discrimination or harassment, personnel, employment and labor relations matters, academic matters, and other matters for which the College has specific policies, should continue to be made and addressed in accordance with the policies and procedures applicable to such matters and applicable law.

II. <u>Reporting Misconduct</u>

Any person may report allegations of misconduct. Reports shall focus on facts and should avoid speculation. Reports shall include as much detailed information as possible in order to better facilitate evaluation of the nature, extent and urgency of the investigation.

Employees may report allegations of misconduct to their supervisor or other appropriate supervisors in their work area. Employees may also make reports internally to the President, General Counsel, Vice President of Planning and Finance, Vice President of Academic Affairs, Vice President of Student Affairs, Chief Information Officer or Internal Auditor. The College recommends that persons who are not employees of the College make reports to the College official whom the reporting person reasonably believes has responsibility over the affected area or holds one of the positions listed above. Anonymous reporting is also permissible, but such reports must include sufficient detailed information to warrant an investigation. Reports also may be made outside the College to appropriate authorities.

In addition to the methods of report set forth above, any person (identified or anonymous) may make a report of suspected misconduct to the College's hotline at:

1-888-261-1669

or

www.ethicspoint.com

A person making a report under this Policy may request that it be handled as confidentially as possible. Although the College will endeavor to handle all such reports in a confidential matter, other obligations and considerations may preclude the College from maintaining confidentiality in all circumstances.

III. <u>Protection from Retaliation</u>

No individual who in good faith reports misconduct or suspected misconduct (whether internally or to authorities outside the College) shall suffer retaliation for making such a report. Individuals who believe that they have suffered retaliation may report it by one of the reporting methods identified above. Making a report pursuant to this Policy shall not insulate an individual from personnel or other actions that are warranted based upon performance or other factors and are not caused by making a report under this Policy.