

POLICY: Whistleblower Policy		POLICY NUMBER: AM-024-A1
		PREVIOUS/REPLACES: N/A
APPROVED BY: Executive Committee	EFFECTIVE DATE AS OF: December 1, 2021	PRIOR VERSIONS: Employee Manual

1. Policy Statement

Herzing College is committed to maintaining high ethical standards in all of its activities. The College encourages employees and other Stakeholders to report an activity that they believe in good faith is contrary to College policy, ethical standards, accreditation standards or existing laws or regulations, hereinafter referred to as a “Suspect Activity.” The College also assures any employee or other Stakeholder who reports a Suspect Activity that they will not suffer any retaliation from the College or its employees.

2. Scope

This policy applies to all employees and stakeholders.

3. Procedure

1. Stakeholders are often in the best position to observe ethical misconduct or abuse of public trust because of their proximity to day-to-day College operations.
2. It is the responsibility of all Stakeholders to comply with the law and the College’s policies, to report in a timely way any violation or Suspect Activity related to Herzing College. It is also the responsibility of Stakeholders to participate in any investigation into a Suspect Activity. Refer to Herzing College Policy “AM-023-A1 Employee Ethics and Reporting Standards Policy.”
3. Anyone making a report (hereinafter referred to as a “Protected Report”) of a Suspect Activity must be acting in good faith and have reasonable belief in the information disclosed. Any allegations that prove to have been made maliciously or were known to be false at the time of the report will be viewed as a serious disciplinary offense.
4. No person who, acting in good faith and on reasonable belief in the information disclosed,
 - a. submits a Protected Report;
 - b. seeks advice on submitting a Protected Report;
 - c. declines to participate in investigating a Suspect Activity; or
 - d. cooperates in an investigation into a Suspect Activity

shall suffer harassment, threats, discrimination, or adverse employment consequences. An employee who retaliates or directs a retaliatory action against someone is subject to discipline up to and including termination of employment. A Stakeholder (other than an employee) who retaliates or directs a retaliatory action against someone is also subject to discipline up to and including termination of contractual relations and/or expulsion from the College.

5. The College will treat all Protected Reports made under this policy in a confidential and sensitive manner. If appropriate, the College will make reasonable efforts to keep confidential the name(s) of all people reporting allegations. However, people who are reporting should be aware that confidentiality is not the same as anonymity. In the interest of fairness, those individuals who are reported will in many instances be entitled to know the name of the person who has reported them. All individuals involved in a Protected Report or an investigation shall keep the details and results confidential. Detailed results of an investigation will not be disclosed or discussed with anyone other than those who have a legitimate need to know.

4. Administration

Department Heads, Supervisors, Campus Presidents, and all corporate office staff.

5. Review

This policy will be reviewed as required by the Executive Committee in 2025.

6. Definitions

Stakeholder – Any individual with an interest or concern in the college, including those who are a board member, employee, student, contractor, individual attending College events, facility renter, or user of services.

Protected Report – Any report by an individual of a Suspect Activity.

Retaliation – Any adverse action taken against a Stakeholder because that person seeks advice on making a report of a Suspect Activity, makes a Protected Report, co-operates in an investigation of a Suspect Activity, or declines to participate in an investigation of a Suspect Activity.