

## **Ethics (Whistleblower) Policy**

In accordance with passage of the Non-Profit Revitalization Act of 2013 in New York State and Federal Procurement Policy related to Public Contracts ("Grants"), nonprofits must adopt a whistleblower policy to protect against retaliation persons who report suspected improper conduct.

Le Moyne College faculty, staff, administrators, students and vendors are expected to adhere to high standards of professionalism and ethical conduct in carrying out their duties. Maintaining ethical standards, including appropriate accounting, internal controls, auditing and compliance is the responsibility of every member of the Le Moyne community. Early identification and resolution of ethical issues that might arise are critical to maintaining sound business, including but not limited to financial practices. This policy has been created to protect the individual who is making the report from any retaliation.

At Le Moyne responsibilities and decision-making are throughout the organization. While we trust our faculty, staff, administrators, students and vendors to understand and abide by policies and the law, there are, unfortunately, rare instances of improper, even illegal activity. Any Le Moyne community member who observe first-hand, activities or practices that he or she believes to be against the law or College policy should report these activities to the appropriate College official noted in Appendix A. The College Official is responsible for investigating specific allegations reported to him/her.

For matters related to financial, accounting or donor stewardship issues, conflict of interest issues, ethics concerns and grant misconduct or misappropriation of funds; Le Moyne has employed a third-party processor for situations in which the individual making the report is unable or unwilling to use the existing procedure of direct conversation with the appropriate College Official. Reporting of these specific matters can be made via the Le Moyne Ethics Reporting Hotline noted in Appendix A and if the reporter chooses, the allegation or concern can be reported anonymously.

The Associate Controller, Director of Human Resources, and/or Associate Vice President of Finance and Administration & Controller are responsible for the investigation of any allegations or concerns reported to the Le Moyne Ethics Reporting Hotline. In addition, when an individual responsible for investigating is named in the allegation they will not receive notice of the concern. If all three individuals responsible for investigations are named in the allegation the concern will be submitted directly to the Chair of the Finance and Audit Committee of the Le Moyne Board of Trustees for investigation and resolution.

The College will take steps to ensure that the faculty, staff, administrators, students and vendors who come forward in good faith will be protected from retaliation in employment practices at Le Moyne. It is in the interest of the employee to protect themselves and the College by reporting under this policy.

This protection is afforded to all Le Moyne community members who communicate information in good faith and through the appropriate channels.

The results of any investigation will be reported to the Vice President of Finance and Administration & Treasurer and when necessary the President and/or the chair of the Finance & Audit Committee of the Board of Trustees. Annually a summary report of all allegations or concerns will be provided to the Finance & Audit Committee of the Board of Trustees. When necessary, appropriate action will be taken by the College, commensurate with findings, up to and including termination.

## APENDIX A

### **Direct Conversation with College Officials**

Area of Concern	Departments	College Official
Student Development	Advising, Housing, Security, Student Affairs, Health Services and Study Abroad, HEOP, Cstep	Deborah Cady Melzer, VP of Student Development
Institutional Advancement	Alumni, Donors, Communications	Mary Cotter, VP of Institutional Advancement
Enrollment Management	Registrar, Financial Aid, Admissions, LPP, Step, Upward Bound	John Dolan, VP of Enrollment Management
Academics	Library, Academic Programs, PAC, Continuing Ed	Dr. Linda LeMura, Provost & VP of Academic Affairs
Employment	Performance/Behavior Counseling, Hiring Practices, Benefits, Unlawful Harassment	Jack Matson, AVP of Human Resources
Finance & Administration	Accounting, Accounts Payable, Bursar, Payroll, Purchasing, Athletics, Facilities, Information Technology, Human Resources	Roger Stackpoole, VP of Finance and Administration & Treasurer
All other departments not mentioned above		Brian Loucy, AVP of Finance and Administration & Controller
Complaints involving one or all of the individuals noted above		Fred Pestello, President or Thomas Berkery, Chair of the Finance and Audit Committee

### **Le Moyne Ethics Report Hotline**

(Only for matters related to financial, accounting or donor stewardship issues, conflict of interest issues, ethics concerns and grant misconduct or misappropriation of funds)

Call Center: 1-855-830-6524

Web-based Intake System: [www.LeMoyneEthicsReporting.ethicspoint.com](http://www.LeMoyneEthicsReporting.ethicspoint.com)