Whistleblower Policy

Reporting Fraudulent or Dishonest Conduct

Independent Colleges of Washington (ICW) expects that the staff and Board will conduct all association-related business with regard to the highest standards of integrity and honesty. All members of the ICW community are encouraged to report possible fraudulent or dishonest conduct. An employee should report his or her concerns directly to the President or the Finance Director. In the event that the employee’s concern involves these individuals, the employee may report his or her concern directly to the Chair of the Board of Directors or the Chair of the Finance and Audit Committee. These individual’s names and contact information can be found in a number of locations at ICW, including the committee list on ICW’s web site. ICW will investigate any possible fraudulent or dishonest use or misuse of ICW resources or property by management, staff, volunteers, or members. Anyone found to have engaged in fraudulent or dishonest conduct is subject to disciplinary action by ICW and civil or criminal prosecution when warranted.

Fraudulent or Dishonest Conduct

Fraudulent or dishonest conduct is a deliberate act or failure to act with the intention of obtaining a material unauthorized benefit. Examples of such include, but are not limited to:

- Forgery or alteration of documents
- Unauthorized alteration or manipulation of computer files
- Fraudulent financial reporting
- Submitting fraudulent or improper expense account for business transportation, meals, and lodging
- Pursuit of a benefit or advantage in violation of ICW’s conflict of interest policy
- Misappropriation or misuse of ICW’s resources
- Authorizing or receiving compensation for goods not received or services not performed
- Authorizing or receiving compensation not earned

Reporter Protection

ICW will protect employees reporting fraudulent or dishonest behaviors as defined below:

- ICW will use best efforts to protect employees reporting fraudulent or dishonest conduct against retaliation. ICW cannot guarantee complete confidentiality, however, and there is no such thing as an “unofficial” or “off the record” report. ICW will keep the reporter’s identity confidential, unless: 1) the reporter agrees to be identified; 2) in the reasonable judgment of ICW, identification is necessary to allow ICW or law enforcement officials to properly investigate or respond effectively to the report; 3) identification is required by law or; 4) the person accused is entitled to the information as a matter of legal right in disciplinary or other proceedings.
- ICW’s employees may not retaliate against a reporter with intent or effect of adversely affecting the terms or conditions of the reporter’s employment, including by not limited to, threats of physical harm, loss of a job, punitive work assignments, impact on salary or wages, or other impacts that might well dissuade a reasonable worker from reporting misconduct.
- Reporters who believe that they have been retaliated against may file a written complaint with the President or Finance Director. If the employee’s concern involves these individuals,
the employee may report his or her concern directly to the Chair of the ICW Board or the Chair of the Finance and Audit Committee.

- A proven complaint of retaliation will result in the initiation of disciplinary action.
- Nothing herein shall prohibit the President or the Finance Director from taking corrective action, including disciplinary action, in the usual scope of their duties and based on valid performance-related factors.

Rights and Responsibilities

Staff members are required to report suspected fraudulent or dishonest conduct to the President or the Finance Director. In the event that the concern involves one of these individuals, the manager may report his or her concern directly to the Chair of the ICW Board, or the Chair of the Finance and Audit Committee. The President is responsible for maintaining a system of management controls which help detect and deter fraudulent or dishonest conduct. Failure to establish management controls or to report misconduct within the scope of this policy may result in adverse personnel action.

Responsible care should be taken by all employees in dealing with suspected misconduct to avoid:

- Baseless allegations
- Reporting as fraudulent or dishonest differences of opinion regarding such day-to-day human resource issues as evaluation, promotion, raises, and disciplinary actions
- Premature notice to persons suspected of misconduct and/or disclosure of suspected misconduct to others not responsible for the investigation
- Violations of a person’s rights under the law

Accordingly, a manager faced with a suspected misconduct:

- Should not contact the person suspected to further investigate the matter or demand restitution
- Should not discuss the case with anyone other than the President, the Finance Director or a duly authorized law enforcement officer. In the event that the concern involves the President or the Finance Director, the manager may report his or concern directly to the Chair of the ICW Board or the Chair of the Finance and Audit Committee.
- Should direct all inquiries from any attorney to ICW’s appointed attorney
- Should direct all inquiries from the media to the President or Finance Director

Approved by: ICW Board of Directors
Date: April 7, 2008
Board Reviewed: April 4, 2016