

WELLESLEY COLLEGE



Business Conduct Policy Manual

March 2013

WELLESLEY COLLEGE

Dear Colleague,

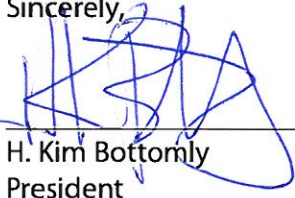
Wellesley is a special college where all of us take pride in the excellence of our work. The success of the institution depends on choices each of us makes every day. All of us have the privilege and responsibility to promote the interests of Wellesley College with integrity, striving to maintain the highest ethical standards. The following is an important policy that we hope you will take the time to review and consider carefully: the Wellesley College Business Conduct Policy. We expect everyone employed by the College to know what is in this policy and to abide by it.

In conducting the business of the College we should avoid any practice that remotely suggests any impropriety. As members of the Wellesley community, we represent the College, and we serve as role models to Wellesley students. Appropriate business behavior is one important way we can ensure that Wellesley is held in the highest regard by alumnae, students, the general public, and all who do business with us.

As you will see, the Business Conduct Policy articulates the ethical and legal principles that have long governed business dealings by Wellesley faculty and staff, both among themselves and with the outside world. This policy is designed to assist everyone who works at Wellesley—faculty, staff and students—by providing information and guidance concerning business conduct. Violation of the Business Conduct Policy is subject to disciplinary action up to and including termination of employment. Every day we face difficult and ambiguous situations. Not every business concern is covered in this text; rather, we have provided some illustrative questions and answers that can help direct each of us toward responsible decisions in all aspects of our work.

Many of our colleagues across the campus have worked together to develop this policy for the College. We appreciate their efforts to make Wellesley College a workplace of continuing high quality. Please let us know any thoughts you may have for helping us to advance these important standards.


Sincerely,



H. Kim Bottomly
President



Andrew B. Evans
Vice President for Finance and Treasurer



Andrew Shennan
Provost and Dean of the College



INTRODUCTION

Wellesley College, like other large, complex institutions, operates by means of a decentralized organizational structure through which responsibility is delegated for a variety of business and accounting functions. This delegation is managed through the issuance of policies and procedures prescribing the manner in which business transactions are to be administered, and through the setting of specific limitations and internal control procedures.

All employees charged with business responsibilities should be familiar with the appropriate policies and procedures covered in this document, as well as those outlined in the following:

- Administrative handbook (published by Human Resources) and Faculty handbook
- Controller's Office website
- Purchasing Department website

This document has been developed to provide further guidance on a variety of business and ethical issues. While it is impossible to address every conceivable situation that may arise, this handbook should provide a framework for faculty and staff to draw upon in their evaluation of specific circumstances. In general, the College aspires to be an organization all of whose members conduct themselves according to the values of honesty, integrity and respect embodied in the Wellesley College honor code, updated in 2005.

Should you have a question regarding business practices that is not addressed in this guide, please feel free to contact any of the directors of the following departments:

- Human Resources Office
- Controller's Office
- Equal Opportunity Office
- Purchasing Department

WORKING WITH ONE ANOTHER

Wellesley College reaffirms its commitment to the principle of equal opportunity and equal treatment in education and employment regardless of a person's race, color, religion, creed, sex, sexual orientation, marital status, age, disability, veteran's status, or national origin. In accepting either a faculty or staff position at Wellesley, an individual agrees to abide by this commitment to the principle of equal opportunity and equal treatment in the performance of his or her assigned responsibilities and in interaction with faculty and staff colleagues and students.

Wellesley College strives to provide the faculty, staff and students with a work environment that is free of harassment or other unreasonable interference with the performance of their College duties. We aspire to be a community of colleagues in which mutual respect guides our day-to-day interactions. While the College affirms an individual's right to self-expression, it expects that the rights and concerns of others who

work at Wellesley are respected as well. At Wellesley, there is no place in the work environment for conduct that demeans or belittles another person. For these reasons, harassment of any kind is unacceptable and subject to disciplinary action.

For more information regarding discriminatory harassment, please refer to the administrative and faculty handbooks or to the Human Resources Office or Equal Opportunity Office.

CONFIDENTIALITY AND DATA SECURITY

Many staff and faculty members handle a variety of proprietary and private information concerning colleagues, students, alumnae, donors, or others associated with the College, as well as confidential information regarding College business. This material may include payroll figures, personal data such as employee home addresses, donor files, or student records. Some personal information, including social security numbers, financial account and credit card information, state or government-issued identification numbers, or health information is protected by state and federal legislation. College employees are responsible for protecting the privacy of all sensitive information with which they work, by utilizing the data only for its intended purpose, properly securing stored and transmitted data, controlling its dissemination and preventing unauthorized use. In order to effectively safeguard sensitive information, employees must also follow established safe computing practices, and manage all sensitive data in a manner consistent with the College's security and confidentiality policies. For more information about proper safeguards for sensitive information, contact the College's Information Security Officer at ISO@wellesley.edu.

It is the responsibility of all Wellesley employees to respect the highest level of privacy for their colleagues and all other members of the Wellesley community. Disclosure and discussion of confidential information obtained from College or department records, either during or after employment with Wellesley, is impermissible unless such disclosure is a normal requirement of an employee's position and has been so authorized. Any unauthorized disclosure of such information is subject to disciplinary action. If an employee is confronted with a situation in which he or she is unsure about the appropriateness of disclosing certain information, he or she should consult with a supervisor or the Human Resources Office.

For more information about the College's Employee Confidentiality Policy, go to: <http://www.wellesley.edu/Policy/empconfidJan2010.pdf> and for the College's Data Security policy, go to: <http://www.wellesley.edu/Policy/WISPFeb2010.pdf>.

QUESTIONS AND ANSWERS

Question: I received a call requesting the home addresses of several staff members in my office. Should I release this information?

Answer: No. Employees expect the College to exercise great discretion in sharing personal information, and their privacy should therefore be respected. An employee's

home address, phone number, and other contact information should not be released without his/her consent, unless a case of emergency—a medical crisis, for instance—warrants this action.

Question: My supervisor is identified as the financial manager on a number of budget accounts. I maintain the account and budget records for our department and have been requested by a co-worker to provide information regarding a particular transaction affecting one of the accounts. Should I share this information?

Answer: Only the financial manager for that account should answer questions regarding transactions. You should refer the co-worker to your supervisor, who can best decide whether or not to provide the answer.

Question: As part of my job, I am often required to notify students in our department of their grades. Should this information be treated confidentially?

Answer: Yes. Grades are considered confidential information, so care should be taken to make certain that a student's grade information is released only to her. Most departments require students to show identification when requesting their grades; you should be certain to confirm your department's specific policy with your supervisor or chair.

Question: A fellow employee who knows I process the payroll asks me for payroll information. May I provide it?

Answer: No. State and federal statutes identify payroll information as confidential. Any College employee must make such a request to the department officially authorized to disseminate such information. The Human Resources Office is the appropriate first source for any inquiries.

Question: A prospective employer for a former employee has asked me to verify salary information for that employee. May I provide it?

Answer: No. State and federal statutes identify payroll information as confidential. The Human Resources Office is the appropriate first source for this type of inquiry.

Question: I manage a database with personnel information and my supervisor has asked me to share my password with her and my three coworkers in case they need to cover for me while I am away. Should I provide my password?

Answer: No. Passwords should never be shared with anyone, even with your supervisor. Access to the database has been granted to you, not to your coworkers. You are responsible for safeguarding the information in that database, and if you shared your password you would be granting unauthorized access. If there is a legitimate need for access to that information by others, contact the data owner for a secure solution.

Question: On occasion I must collect students' license numbers and/or passport information to process paperwork for a college-sponsored trip. May I still do that?

Answer: Yes, as long as that information is required for you to process the paperwork and you securely store it while it is in your possession. (Never store this type of information on a laptop or other mobile device). Once the information is no longer needed, it should be securely shredded.

Question: I have a file containing sensitive information (social security numbers, bank account information) that I need to email to a third party provider in order to process a payment. May I still do that? How can I be sure it is secure?

Answer: Save the document as a pdf file in Adobe Acrobat (Professional), and use the security feature to password encrypt the document. Then send the encrypted document as an attachment to your email. Do not include the password in your email - call the vendor to give them the password over the phone.

Question: I need to send email containing sensitive information to a colleague in another department at Wellesley. Do I need to encrypt the email?

Answer: No. As long as the email is being sent internally, from one Wellesley College email account to another, the email does not need to be encrypted. It is secure because it is staying within our network.

CONFLICT OF INTEREST

GENERAL PURPOSE

Wellesley College employees hold important responsibilities in connection with the work they perform for the College. Wellesley College expects that all personnel will perform their duties in good faith and in the best interests of the College. In particular, employees are expected to avoid activities, agreements, business investments or interests, or other situations that could be construed as either in conflict with the interests of the College or as an interference with the individual's duty to serve the College to the best of his or her ability.

DEFINITION OF CONFLICT OF INTEREST

A conflict of interest exists when an employee is in a position to benefit personally, directly or indirectly, from his or her dealings with an entity or person conducting business with the College. All employees have an obligation to avoid conflict, or the appearance of conflict, between their personal interests and the interests of the College in dealing with outside organizations or individuals.

An individual shall be considered to have a possible conflict if either the individual, his or her family, or associates (1) has or appears to have any material, financial or other interest which may impair the individual's judgment in carrying out the responsibilities delegated by the College, or (2) may gain a personal benefit from the knowledge of information confidential to the College. Family is defined as spouse or domestic partner, parents, siblings, children, and, if living in the same household, other relatives. An associate includes any person, organization, enterprise or trust in which the individual or members of his or her family (1) is a director, officer, employee, partner or trustee, or (2) has any material association.

REPORTABLE INTEREST AND RELATIONSHIPS

Under the policy, “employees” refers to all officers, deans, faculty, department heads and employees possessing the authority to act or make decisions on behalf of Wellesley College. Employees possessing the authority to act or make decisions on behalf of Wellesley or who supervise persons having such authority, must notify the College of the existence of any situation described below:

The current or potential involvement of the employee, or a member of his or her family, in a financial or other relationship that directly and significantly affects, or potentially could affect, his or her independent, unbiased judgment in his or her duties to the College. A conflict of interest could arise, for example from an employee’s compensated service as a consultant; part-time employment with a firm doing business with the College; membership on a board of directors; or significant ownership interests (e.g., stock).

The possession on the part of the employee, or a member of his or her family, of a significant ownership interest or management function in an organization conducting business with the College. A significant ownership interest shall mean 1 percent (1%) or more of the stock in the corporation conducting business with the College; 1 percent (1%) or more interest in the profits of a partnership conducting business with the College; or a beneficial interest of 1 percent (1%) or more in any other enterprise conducting business with the College.

The employee’s potential for material, financial, or other benefit from knowledge of information confidential to the College.

ANNUAL DISCLOSURE GUIDELINES AND REPORTABLE INTERESTS

Most concerns about conflicts of interest may be resolved and appropriately addressed through prompt and complete disclosure. In furtherance of that objective, the College has adopted the following guidelines:

All Wellesley College officers, deans, select department heads and other employees on an annual basis, will make a disclosure to the Vice President for Finance and Treasurer of all reportable conflicts of interest as defined in this policy (in the form of Exhibit A). Officers, deans, select department heads and select other employees are responsible for completing this form electronically using Banner Self Service under Employee Services. The responses may be modified by the employee at any time during the year if there are any changes.

The Vice President for Finance and Treasurer or his designee will review all electronic forms and take any appropriate action that may be necessary. If the Vice President for Finance and Treasurer determines that an actual or potential conflict of interest exists, the employee may appeal that determination and any requirements imposed to manage the conflict to a Division Head within fourteen days. The decision of the Division Head shall be final. If no appeal is taken in a timely manner, the initial determination shall become the final decision of the College. In the event the Wellesley College employee seeking

appeal is a Division Head, the matter will be referred to the Trustee Audit Committee for resolution.

Failure to disclose a reportable interest or relationship or neglecting to comply with the College's requirement for managing a determined conflict of interest may subject the employee to disciplinary action up to and including termination.

CONFLICT OF COMMITMENT (Consulting and Outside Employment)

Faculty should refer to the faculty handbook under the section titled "Consulting and Other Paid Work Outside the College" for the conflict of commitment policy.

If a person is a full-time administrative employee of the college, his/her primary employment responsibility is to the College. Prior to the commencement of any outside employment or consulting engagements that may involve or appear to involve a conflict of interest with your College responsibilities or that may compromise the College's relationship with an outside employer or consulting client, approval must be granted by the employee's Department Head, Division Head, and the Assistant Vice-President/Director of Human Resources. If an employee is currently engaged in outside employment or consulting that fits the definition above, the employee must disclose this information to the Department Head, Division Head, and Assistant Vice-President/Director of Human Resources for review under this policy.

The general conditions under which the college will approve an employee's engaging in outside employment or consulting are:

- Outside employment or consulting will not interfere with or impair the employee's college responsibilities or raise substantial concerns about possible conflicts of interest or interference with the employee's college responsibilities.
- Outside employment or consulting will not compromise the college's relationship with the outside employer or consulting client.
- College materials, supplies and services will not be used for any outside work.
- The property and facilities of the college will not be used for outside work.
- Any time given to these activities must be outside the employee's normal work schedule, unless approval is granted by and arrangements are made with the Department Head to use vacation time or take time off without pay.

Other conditions may be applicable based on the circumstances of each situation.

QUESTIONS & ANSWERS

Question: I am a faculty member and wish to take on some consulting work. Does Wellesley allow me to take on this work?

Answer: Faculty should refer to the faculty handbook under the section titled "Consulting and Other Paid Work Outside the College" for the policy regarding consulting work.

Question: I am a full-time employee in an administrative department. Another college would like to hire me as a consultant for a few hours during my scheduled hours with Wellesley. Can I take this consulting job and make up my hours to Wellesley at another time?

Answer: Generally no. Your consulting arrangement should not interfere with or impair your college responsibilities. A consulting job that requires you to work on a day that is your regular normal Wellesley schedule (i.e. not taken as a vacation day) would be considered an interference of your college responsibilities.

Question: I am a full-time employee in an administrative department. Another college would like to hire me as a consultant in the evenings or over the weekend. Can I take this consulting job since it does not overlap with my scheduled hours at Wellesley?

Answer: Perhaps. You should provide the details of this consulting arrangement and get approval from your Department Head, Division Head, and the Assistant Vice-President/Director of Human Resources before accepting this consulting job. However, if you arrange in advance to utilize your vacation time, and the timing would not interfere with your obligations at Wellesley, your request could be approved.

VENDOR RELATIONS AND CONTRACTS

All faculty and staff should observe the following with regard to vendor relations:

- Give full primary consideration to the objectives and policies of the College.
- Strive to obtain the maximum value for each dollar of expenditures.
- Conduct business with potential and current vendors in an atmosphere of good faith.
- Demand honesty in sales representation, whether offered through the medium of a verbal or written statement, an advertisement, or a sample of the product.
- Make reasonable efforts to arrive at an equitable and mutually beneficial agreement that is in the best interest of the College when settling any controversy with a supplier.
- Avoid activities that would convey the appearance of preferential treatment.

Vendor contracts may be extensive and involve complex terms, some of which may require legal review. If you as an employee of the College (agent) have been given the authority to sign contracts, you should read all contracts and be sure you understand in full how you are committing the College. If you have any questions about a contract, you should consult with your Division Head or the Vice President for Finance and Treasurer.

QUESTIONS & ANSWERS

Question: A family friend is involved in the sale of an item that the College frequently purchases from another vendor. Could I ask the College to consider switching vendors?

Answer: The Purchasing Department is always willing to consider adding vendors to its bid list. You may feel free to submit this vendor's name to the department for future consideration.

Question: A department has a need for a piece of equipment. Is it permissible to commit the College to purchasing the items from a certain company prior to obtaining the required bids in order to expedite delivery?

Answer: No, unless your department has been given specific authority to make such a purchase, the Purchasing Department is authorized to commit the College in purchasing matters. Please check with your Department Head if you are unclear about your authority to purchase. The College has various policies and procedures they follow in the purchase of goods and services. Wellesley College's purchase order contains many terms and conditions to protect the College in case a dispute arises between the requisitioner and the vendor. Without a purchase order, the College has no commitment to pay the bill, leaving the requisitioner potentially responsible for payment.

RECEIVING OR MAKING GIFTS

Gifts made to College personnel may be in the form of entertainment, social invitations, sporting events, favors, personal property, services, or discounts. Gifts from vendors, contractors, and others conducting business with Wellesley are most often given as a gesture of goodwill and appreciation, but all faculty and staff should assume that gifts are generally given with the intent to influence a business decision. This behavior is customary business practice, but such activity serves no useful purpose and can create conflicts of interest. It is the obligation of the employee responsible for a business relationship to handle gifts properly and in accordance with College policy.

Employees (and family members of employees) may not accept gifts of more than a token or nominal value from a supplier or vendor under any circumstance. While at times it may be difficult to quantify the cost of a gift, it is always important to consider the appearance of impropriety and unfair business practice. If you have any doubts about whether such gift would give the appearance of impropriety, please discuss this with your supervisor before accepting such gift.

The College has various authorized recognition programs for employees. However, the expenditure of College funds for gifts to employees or students for other recognition reasons may be made in the form of a gift from the College bookstore, a Wellesley College chair from the Distribution Center, a gift certificate to the Wellesley College Club or a gift valued less than or equal to \$100 including a specific gift card. Your Division Head must approve any other gift. A specific gift card (not a general gift card) is given for a particular establishment such as Targets, Macys, Best Buy, and Olive Garden Restaurant, etc. A general gift card is one that may be used at a variety of establishments. Some examples of a general gift card would be an American Express, MasterCard, or a "mall" gift card. Due to its broad use, a general gift card is considered a

cash equivalent gift under IRS guidelines and as such must be recorded as compensation and taxed accordingly. Because of this tax implication, general gift cards should not be given to employees or students.

In general, gifts or contributions made to charitable organizations are not considered a College business expense. An exception to this would be contributions made in lieu of flowers for bereavement or services provided.

QUESTIONS & ANSWERS

Question: A vendor offered me two tickets, worth approximately \$100, to a sporting event. Should I accept the ticket?

Answer: The value of the tickets is relatively immaterial and the game is a one-time event, so it is permissible to accept the tickets.

Question: A consultant working with the College has offered to let me stay at his vacation home on Cape Cod for the weekend. Should I accept the invitation?

Answer: This gift would seem to have more than a token or nominal value, and acceptance would give the appearance of impropriety, so it would be inappropriate for you to accept this invitation.

Question: A valued employee is leaving the College. Several co-workers have suggested purchasing a going away gift. Can I use College funds to support such an endeavor?

Answer: Although a valued employee who is leaving should be recognized, one must remember that College assets should be used only to further the mission of the College. A small gift may be made with a purchase from the College bookstore, a Wellesley College chair from the Distribution Center, or a specific gift certificate/card in an amount less than or equal to \$100. Your Division Head must approve any other gifts valued over \$100 or any general gift check/card of any amount.

DEPARTMENT PARTIES

The College holds various department parties such as holiday parties, end-of-the-year (or semester) parties, employee recognition parties, retirement/going away parties, etc. Such parties that are funded by the College will require the approval of the Division Head even if it is charged to a budget for which you have responsibility.

QUESTIONS & ANSWERS

Question: Our department has always had a holiday party in December, the costs for which were charged to our department's operating budget. Do I need to get approval even if I am the person responsible for the operating budget?

Answer: Yes, the holiday party must be approved by your Division Head. The Division Head must also sign all payment requests for this party.

Question: Our department has an annual retreat to discuss department goals. Does this expense require the approval of the Division Head?

Answer: No. Since your annual retreat has a business purpose of discussing department goals, it does not qualify as a department party. It should be reimbursed as a business meeting and processed according to the procedures set forth in the Controller's Office website. Documentation should include the business purpose and the names of the individuals who attended this retreat.

Question: As part of a lecture series, our department will be providing lunch to the guest speaker along with some students and faculty members. Does this expense require the approval of the Division Head?

Answer: No. Since your luncheon has a business purpose as part of a lecture series, it does not qualify as a department party. It should be reimbursed as a business meeting and processed according to the procedures set forth in the Controller's Office website. Documentation should include the business purpose.

INTERNAL CONTROLS AND PROPER ACCOUNTING

Internal controls provide the keystone of sound business practices. These controls include adequate segregation of duties, diligent application of preventive and detective control systems, and conscientious compliance with authorization, reporting, and other established processes. Segregation of duties is used to ensure that errors or irregularities are prevented or detected on a timely basis by employees in the normal course of business. At the most basic level, it means that no single individual should have control over two or more phases of a transaction or operation and therefore, responsibilities should be assigned to ensure a crosscheck of duties. Internal controls are critical to ensuring efficient operations, responsible financial management, accurate financial reporting, careful protection of assets, and satisfactory compliance with applicable laws and regulations. Faculty and staff are expected to maintain and support internal controls structures at Wellesley College.

Sound business practice calls for each member of the Wellesley College faculty, staff, and community to assume responsibility for safeguarding and preserving the assets and resources of the College. The following policy statements pertain to all business activities of the College. It is the responsibility of all supervisors to ensure that their staff is aware of and familiar with these policy statements.

1. All revenues generated by College related activities and all expenditures for goods and services must be recorded and accounted for in the Banner financial module.
2. The Banner financial module consists of the general and operating ledger and all subsidiary systems (manual and automated) that serve as the basis for ledger entries. All transactions, whether recorded directly into the general and operating ledger or entered through a subsystem, should be transcribed in a way that allows for the preparation of financial statements in conformance with Generally Accepted Accounting Principles (GAAP). The Controller's Office is responsible for the accuracy, integrity, and overall management of the Banner financial

module and should therefore be consulted on any matters relating to accounting policies and procedures.

3. The recording of all financial transactions must be timely and accurate, clearly identifying the true business nature of the transaction. Specific guidance pertaining to the timely posting of transactions for fiscal year-end is provided in a memorandum to all departments from the Controller's Office in April or May of each fiscal year.
4. No transaction, whether recorded directly into the general ledger or indirectly from a subsystem, nor any supporting documentation, shall be deliberately left incomplete or distorted. No payments made on behalf of the College are to be approved with the understanding that any part of such payment is for any purpose other than that described on its supporting documents.
5. All cash receipts including checks, cash, money orders, or traveler's checks should be deposited at the Controller's Office. Checks should be made payable to Wellesley College. All donations and or gifts to the College should be handled through the Resources Office.
6. The use of College funds or assets for any unlawful or improper purpose is prohibited by not only the College but also local, state and federal law. Ignorance of the law is no excuse; therefore you should contact the Controller's Office should you have any questions concerning your use of College assets.
7. No bank accounts are to be established by departments, student organizations, or others acting on their behalf for the purpose of funding, or to assist in funding, any College activity. Should you or your office require cash funds, petty cash accounts or advances are available by contacting the Controller's Office.
8. Each account in the College's financial records system has been assigned a "responsible person"—usually a department chair, administrator, or principal investigator, whose responsibility is to:
 - a. assure that monthly reports of account activity are reviewed to determine that all charges and entries are accurate and complete;
 - b. verify that all entries made to each account have been properly allocated, representing expenses for activities that pertain to the purpose of the account;
 - c. take appropriate action to correct any improper charges attributed to an account by notifying the Controller's Office immediately;
 - d. ensure that all charges made to government and other restricted sponsoring agency accounts are appropriate and allowable under the sponsor's regulations. These expenditures must also follow Wellesley College's guidelines for review and approval.
9. All budget projections provided by those responsible for an account must properly reflect activity posted to the financial records system and accurately represent all known activity being recorded through any subsidiary system.

10. All disbursements are processed through the Controller's Office. This includes vendor invoices, expense reimbursements, and payroll. Please refer to the Controller's Office website for details on procedures for all disbursements.

QUESTIONS & ANSWERS

Question: Although I have been designated the "responsible person" for a particular College account, time constraints prevent me from reviewing account activity in detail. Is it acceptable for me to assign this task to a staff member?

Answer: Yes, it is acceptable to assign the task. However, you do remain responsible for ensuring that the person carries out the task completely—that he or she acts to resolve any errors or misrepresentations in the accounts or informs you of any discrepancies so that you can take the necessary corrective actions. You are responsible even though you assigned the duty to a subordinate.

Question: I have a petty cash account and have been asked to disburse funds to an individual for services rendered. Can I use petty cash to pay individuals for services rendered?

Answer: No. Petty cash should not be used for payment to individuals. Petty cash funds should only be used in accordance with the purpose defined when the fund was originally established with the Controller's Office. Improper use of petty cash violates College policy and in some cases may also violate local, state or federal law.

Question: In order to provide for certain recurring needs, my department has recently opened a checking account. Is this permissible?

Answer: No. Your department should consult the Controller's Office in order to develop a system that will both address its needs for handling miscellaneous or program income and expenses, and ensure that activity is being properly recorded in the College's financial records system.

WHISTLEBLOWER POLICY

GENERAL

The College requires all employees (including faculty) to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. The College is committed to having policies and procedures that comply with the laws and regulations to which it is subject. The College's internal controls and operating procedures are intended to detect and prevent or deter improper activities. However, even the best systems of control cannot provide absolute safeguards against irregularities.

WHISTLEBLOWER POLICY

The College has adopted a Whistleblower policy for employees to report a concern of financial wrongdoing outside of the traditional reporting mechanism. The Whistleblower Policy allows allegations to be made outside of the immediate area of which the suspected employee is associated.

This Whistleblower Policy governs only the reporting and investigation of improper financial related activities as defined below. The policy is not intended and may not be used for personal or employment grievances, general compensation and benefit complaints, opinions on policy, etc.

Definition

Improper Financial Related Activities: In general, an improper financial related activity is a deliberate act or failure to act with the intention of obtaining an unauthorized benefit from the College. The following constitute a non-exclusive list of improper financial related activities:

- improprieties in the handling or reporting of money or financial transactions
- misappropriation or misuse of College resources, including funds, supplies, or other assets and services
- embezzlement, theft, misappropriation or other financial irregularities
- forgery or alteration of documents (checks, time sheets, contractor agreements, purchase orders, invoices, other financial documents, electronic files)
- authorization or receipt of compensation for services not received or not performed, or hours not worked.

To make a report under this policy an employee is required to complete and sign a Whistleblower Disclosure Statement (Exhibit B). Reporting of the violation should be made through the Vice President for Finance and Treasurer, as follows:

In Person: Employees may visit the office of the Vice President for Finance and Treasurer during standard operating hours to file a report, or make arrangements for an appointment during nonstandard operating hours.

Mail: Employees may send to the Vice President for Finance and Treasurer a completed Whistleblower Disclosure Statement. The employee should understand that he/she may need to visit the office of the Vice President for Finance and Treasurer to answer any questions from the review of the statement.

If the report directly concerns the Vice President for Finance and Treasurer, the Whistleblower Disclosure Statement should be sent directly to the President.

Employees should be aware that the filing of the statement noted above acknowledges their understanding that an investigation will commence.

Since successful investigations are often based upon timely evidence, reports under this policy should be made as soon as possible, preferably within six months of the occurrence, but in any event within one year.

PROTECTION FROM RETALIATION

An employee who in good faith reports a suspected violation of law or College policy shall not suffer harassment, retaliation or adverse employment consequence from other employees or the College. An employee who retaliates against someone who has reported a suspected violation in good faith is subject to discipline up to and including termination of employment. Any employee who believes that he/she has been retaliated against after making a good faith report may report this alleged retaliation to the Assistant Vice President and Director of Human Resources & Equal Opportunity or the Vice President for Finance and Treasurer.

MANAGEMENT ROLES AND RESPONSIBILITIES

College administrators at all levels of management, including academic department chairs, are responsible for establishing and maintaining proper internal controls that provide security and accountability for the resources entrusted to them. Administrators should be familiar with the risks and exposures inherent in their areas of responsibility and be alert for any indications of improper activities, misappropriation, or dishonest activity.

If you receive a report of an improper financial related activity you should ensure that the notification promptly reaches the Vice President for Finance and Treasurer. If the report directly concerns the Vice President for Finance and Treasurer, the incident should be reported directly to the President.

A supervisor/department head who is informed of suspected improper activities should NOT contact the person suspected and should NOT discuss the matter with anyone other than the Vice President for Finance and Treasurer.

CONFIDENTIALITY UNDER THE WHISTLEBLOWER POLICY

Confidentiality of the reporter will be maintained to the extent practicable within the limitations of the law, College policy and the legitimate needs of the investigation. In addition, employees submitting a report should be aware that their public testimony might be needed to prove the case against the suspected employee.

Although an employee's report may possess merit, comments made to others regarding another employee could constitute defamation, invasion of privacy or other grounds for civil liability. Employees should not discuss allegations outside of the reporting and investigation process. This is especially the case should the investigation prove that the suspected employee's actions were lawful or within College policy.

Note that if an employee self-discloses his or her identity directly or indirectly through his or her own actions outside of the official investigation process, the College is not obligated to maintain confidentiality.

Note that there is no such thing as “unofficial” or “off the record” reporting.

INVESTIGATION UNDER THE WHISTLEBLOWER POLICY

The Vice President for Finance and Treasurer will maintain the Whistleblower Disclosure Statements received in his/her office until the outcome of the investigation. The Vice President for Finance and Treasurer will actively participate in an investigation. The investigator/investigation team has access to all resources of the College and external counsel to ensure a fair and accurate resolution to the alleged violation.

The investigator/investigation team is responsible for documenting its investigation and its rationale for the resolution. The investigation is closed when a resolution is reached by the investigator/investigation team. Documents and evidence relating to a satisfactorily established closed investigation will remain in the office of the Vice President for Finance and Treasurer.

RESULTS OF REPORT MADE UNDER THE WHISTLEBLOWER POLICY

If the result of the investigation is that the allegation is not satisfactorily established, the investigation will be deemed complete. If the investigation establishes that a violation of law, external regulation or College policy occurred, the Vice President for Finance and Treasurer will determine appropriate action based upon law and College policy, and will consult with the Human Resources Department or the Dean of the College, as appropriate, to determine if any immediate personnel actions are necessary. They will consult with College counsel as appropriate. An individual who has been deemed to have committed an act in violation of law or College policy will be subject to discipline, up to and including termination.

Whistleblower Disclosure Statements that have been satisfactorily established with related documentation will be delivered to the Audit Committee (Board of Trustees subcommittee) chairperson at the time of each Board Meeting on the Wellesley Campus. The Audit Committee chairperson will review these documents and communicate with the Vice President for Finance and Treasurer.

SANCTIONS FOR A FALSE REPORT

A report made under this policy can have considerable impact on the personal and professional lives of those charged both during the investigation and long term. An employee shall not intentionally misuse the College's Whistleblower Policy and procedures. Intentional misuse includes, but is not limited to, frivolous claims, attempts to treat a personal grievance or personnel dispute as an allegation of wrongdoing, lack of good faith in invoking the policy or any known false, malicious or misleading statements made at any time under the procedures of the policy. The Vice President for Finance and Treasurer will report to the Assistant Vice President and Director of Human Resources & Equal Opportunity, or to the Dean of the College the identity of any employee who is believed to have intentionally misused the Whistleblower Policy. After appropriate review by these individuals and the Director of the applicable office of the employee, the employee is subject to discipline up to and including termination.

COMPLIANCE HOTLINE

In addition to the above reporting mechanisms, the College has instituted a Compliance Hotline. The Compliance Hotline may be used to report work-related ethics and compliance issues. An employee's input may provide the information necessary for the College to investigate and remedy a potentially damaging situation to the College community. (This Compliance Hotline is not meant to be a substitute for the College's established method of employees reporting workplace concerns to their supervisors, a Human Resources representative, or the College's Ombudsperson. Rather, the Compliance Hotline is meant to offer an additional means of reporting work-related compliance or ethics concerns if an employee does not feel comfortable speaking with a supervisor, someone in Human Resources, or the Ombudsperson.)

The Hotline is managed by a third party vendor, Compliance Concepts, Inc. Trained Compliance Risk Specialists answer the hotline and document all calls. The Compliance Risk Specialist will establish a call back time for the caller to call the hotline seeking an update on the reported matter. A caller is not required to provide his/her name. Once a report is received, the Compliance Risk Specialist will notify the College, typically through the Office of Finance and Administration, of the report. Based on the specific nature of the report, the Office of Finance and Administration will contact the appropriate College administrators to evaluate the issue and proceed with the appropriate next steps, which may include a formal or informal investigation. The Office of Finance and Administration will make notations in the online case file as to the status of the matter. Therefore, when the caller calls the Compliance Hotline back, he/she may be informed of the status.

The College prohibits retaliation against persons because they in good faith make a report to the Compliance Hotline and/or participate in an investigation of the report. The College will take appropriate disciplinary actions (up to and including termination of employment) against persons who engage in such retaliatory conduct.

The Wellesley College Compliance Hotline is available 24 hours a day, 7 days a week. The dedicated toll free number for employees to call is 1-877-269-6176.

GENERAL REPORTING OUTSIDE OF THE WHISTLEBLOWER POLICY

All employees are encouraged to report suspected violations of law or College policy directly to his/her supervisor, outside of the Whistleblower Policy. If the employee feels unable to do so or if there is any reason why this may not be appropriate, the employee should raise the issue with the department chair, dean, director or other College official/office having responsibility for overseeing compliance with the particular policy or procedure in accordance with the guidance below:

Employment Policies

Assistant Vice President and Director of Human Resources & Equal Opportunity

Academic Misconduct

Faculty Related – Provost and Dean of the College

Student Related – Dean of Students

Student Matters (other than Academic Misconduct)
Dean of Students

Environmental Health Matters
Director, Environmental Health and Safety

Medical or Health Matters
Clinical Director
Administrative Director and Chief Psychologist

Data Security
Chief Information Officer

Criminal Matters, Emergencies, Escort, Personal Harm
Director of Public Safety and Chief of Police

All Other Matters
Vice President for Finance and Treasurer

QUESTIONS & ANSWERS

Question: What should I do if I notice that excessive amounts of goods being ordered by a co-worker are for personal use and are being charged to a departmental account?

Answer: The misuse of College assets for personal gain is improper and considered fraud. You should report this violation by completing and signing a Whistleblower Disclosure Statement (Exhibit B). Reporting of the violation should be made through the Vice President for Finance and Treasurer.

Question: I recently witnessed one of my fellow employees submitting false receipts for business travel. What can I do?

Answer: Report what you have by completing and signing a Whistleblower Disclosure Statement (Exhibit B). Reporting of the violation should be made through the Vice President for Finance and Treasurer.

Question: My office currently has a computer printer which is not being used by the College. I would like to purchase this printer for my computer at home. Can I write a check to the department and take the computer home?

Answer: No. The sale of these items to employees is prohibited because it may expose the College to an unforeseen liability and jeopardize the College's tax-exempt status.

CONFLICT OF INTEREST DISCLOSURE STATEMENT

Pursuant to Wellesley College’s Business Conduct Policy requiring disclosure of certain interest, a copy of which has been furnished to me, and consistent with the purposes and intentions of this policy, I hereby state that I or a member of my immediate family do not have:

1. a current or potential involvement in a financial or other relationship that directly and significantly affects, or potentially could affect my independent, unbiased judgment in my duty to the College;
2. possession of a significant ownership interest or management functions in an organization conducting business with the College;
3. potential for material, financial, or other benefit from knowledge of information confidential to the College.

Exceptions to the above statement are noted as follows:

I hereby certify that the information disclosed herein is, to the best of my knowledge complete and accurate. I hereby agree to report promptly to the Vice President for Finance and Treasurer any situation or transaction that may arise during the forthcoming year that constitutes a potential conflict of interest and report the same on an amended Disclosure Statement.

**Wellesley College
Whistleblower Disclosure Statement**

Personal Information:

Name: _____ Email Address: _____

Campus Extension: _____

Incident Information:

Date(s): _____

Name of suspected employee(s):

Witness(es):

Description of the alleged violation (*please be as specific as possible and attach additional sheets, as necessary*):

Do you have any evidence supporting the allegation? *Circle* Yes No

If yes, please describe:

Please describe any physical evidence left with the Vice President for Finance and Treasurer:

Certification:

I have read and understand the Wellesley College Whistleblower Policy. I represent that the facts outlined above are true and accurate to the best of my knowledge.

Signature

Date

This disclosure statement has been received by the Vice President for Finance and Treasurer on the date noted below, and I am in custody of any evidence noted above.

Vice President for Finance and Treasurer Signature

Date