



HEBREW UNION COLLEGE-JEWISH INSTITUTE OF RELIGION WHISTLEBLOWER PROTECTION POLICY

Policy Statement

Employees of the Hebrew Union College-Jewish Institute of Religion (College-Institute) have a responsibility for the stewardship of the resources that enable it to pursue its mission. Through its established policies and procedures, the College-Institute is committed to compliance with all applicable laws and regulations. Laws, regulations, policies and procedures strengthen and promote ethical practices and ethical treatment of the members of the College-Institute community and those who conduct business with the College-Institute.

The College-Institute's operating procedures are intended to detect and to prevent or deter improper activities. However, even the best systems of control cannot provide absolute safeguards against irregularities. This whistleblower policy governs reporting and investigation of allegations of suspected improper activities.

This policy applies to information regarding any action, policy, regulation, practice or procedure of the College-Institute or its employees, contractors or agents that is unethical, illegal or contrary to public interest, including but not limited to the misuse, misappropriation, or misreporting of College-Institute funds or its physical assets, questionable auditing or accounting practices, abuse of authority, or mismanagement.

Employees and others are encouraged to use the following guidelines for reporting all allegations of suspected improper activities.

Guidelines

1. An employee who has a question about the propriety of any transaction or practice under College-Institute policies and procedures should seek guidance from his/her supervisor or the College-Institute official who has responsibility for overseeing compliance with the particular policy or procedure.
2. An employee who becomes aware of a potential or actual violation of College-Institute policies or procedures should report such potential or actual conduct, regardless of whether the employee is personally involved in the matter. An employee is encouraged to make such a report to his/her immediate supervisor. If the employee feels unable to do so or if there is any reason why this may not be appropriate, the employee may make a report to Sam Perelson (sam@pwcpc or 212-605-3100), the Chair of the College-Institute Audit Committee, who is the designated official for the receipt of whistleblower complaints.

3. All reports shall be handled as confidentially as possible under the circumstances, and the College-Institute will endeavor to handle all such reports with discretion and with due regard for the privacy of the reporting employee.
4. An employee may make anonymous reports, with the understanding that any investigation may be hampered due to the inability to contact the employee in order to obtain a full and complete account of relevant and necessary facts from the her/him or to ask additional questions or seek clarification as any investigation proceeds.
5. An employee who comes forward in good faith with reports or concerns about compliance with College-Institute policies or procedures shall not be subject to reprisal or retaliation for making such a report. Any employee who believes that he/she is being retaliated against for making such a report should immediately bring it to the attention of the Administrative Director of Human Resources for immediate investigation.

Retaliation Prohibited

Except as provided below, no disciplinary action shall be threatened, initiated or administered against a College-Institute employee due to their filing of a whistleblower complaint. This shall not apply to an employee who discloses information that he or she knows to be false or who discloses information with disregard for the truth or falsity thereof.

Disciplinary action means any direct or indirect form of discipline or penalty, including but not limited to dismissal, demotion, transfer, reassignment, suspension, corrective action, reprimand, admonishment, unsatisfactory or below standard performance evaluation, reduction in force, or withholding of work, or the threat of such discipline or penalty.

Filing a Retaliation Complaint

A retaliation complaint may be filed in writing with the College-Institute's Administrative Director of Human Resources (Cindy Kutas at ckutas@huc.edu or 513-487-3203). A retaliation claim must be filed within 45 days of the employee's discovery of the disciplinary action. If there is more than one instance of retaliation, the complaint must be filed within 30 days of the most recent alleged disciplinary action.

The complaint will be investigated by the Administrative Director of Human Resources, who shall report the results of the investigation to the Vice President – Chief Administrative Officer (CAO) and to the Chair of the College-Institute Audit Committee. The Vice President-CAO will assure that appropriate remedial action is taken with respect to the employee against whom retaliation has occurred and that appropriate disciplinary action is taken against the employee(s) found to have retaliated. Depending on the significance of the complaint, the Vice President-CAO shall inform the President and the Chair of the Board as needed.