



FRAUD AWARENESS AND WHISTLEBLOWER PROTECTION PROCEDURE

Board Bylaw:
Policy Number: 2.1300
Subject Area: General College Policies/Administration
Approved Date: 07/24/2017

- I. If an employee suspects or observes wrongdoing or fraudulent activity as described in the Fraud Awareness and Whistleblower Protection Policy, the employee is to contact a College Ethics Officer or submit the allegations via the Online Reporting Center - www.lighthouse-services.com/kaskaskia. Individuals are encouraged to share their names when reporting a breach; however, anonymity remains an option when submitting via the Online Reporting Center. Identification of the person reporting the concern provides the opportunity for follow up which will aid the investigation. Anonymous reports will be reviewed to the extent possible given the information provided. The College will do its best to protect an individual's identity when a concern is raised unless otherwise required by law, College policy, or a legitimate need of the investigation.
- II. Upon receipt of a report of wrongdoing or fraudulent activity, an Ethics Officer will initiate an internal investigation. The employee is encouraged to discuss confidentiality requirements, if any, with the Ethics Officer. The employee may be asked to cooperate with related investigations performed by the College, oversight groups, and/or law enforcement officials. Investigators may request the assistance of other employees. Appropriate consultation with union representatives will occur as necessary or required by College policy, contract, or regulation.
- III. The Ethics Officer receiving the report is responsible for ensuring a thorough investigation is completed in a timely manner. The Officer may elect to conduct the investigation or secure appropriate resources to handle the research depending on the situation. The Officer is also responsible for ensuring corrective action is taken and discussing resolution with the individual who brought forward the concern, to the extent possible.
- IV. If a complaint involves an Ethics Officer, wrongdoing will be reported to the alternative Ethics Officer. If that position is unfilled for any reason, the activity will be reported to the College President. In the event a complaint of wrongdoing involves the President of the College, an Ethics Officer will immediately notify the Chair of the Board of Trustees. Additionally, upon receipt of a complaint involving a Board of Trustees member, the President will bring the complaint to the attention of the entire Board of Trustees.
- V. An employee who suspects retaliation has resulted from reporting an activity or participating in an investigation is to immediately contact his supervisor. If the employee is not comfortable discussing with the supervisor or is not satisfied with the supervisor's explanation, the concerns are to be discussed with an Ethics Officer. Complaints of retaliation will be investigated and appropriate corrective measures will be taken when allegations of retaliation are substantiated. This protection from retaliation does not prohibit management from taking action in the normal scope of their duties.

VI. Reporting Resources

A. Ethics Officers:

1. Judy Hemker, Vice-President of Administrative Services / CFO

(618) 545-3105

jhemker@kaskaskia.edu

2. Jill Hercules, Human Resources Director

(618) 545-3018

jhercules@kaskaskia.edu

B. Online Reporting Center (anonymous if name is omitted):

www.lighthouse-services.com/kaskaskia

Replaces Fraud Awareness and Whistleblower Protection Procedure 4.01 approved July 24, 2017.