

LANCASTER BIBLE COLLEGE
HUMAN RESOURCES POLICY

**TITLE: Reporting Suspected Misconduct
 (Whistleblower Policy)**

Introduction

Lancaster Bible College expects its employees, as bodies of Christ, to perform their duties in accordance with applicable laws and regulations, College policy and procedures and high ethical standards. The College is committed to comply with all applicable laws and regulations and to promulgate and administer college policies and procedures that faithfully apply such laws and regulations. A culture of compliance strengthens and promotes ethical practices and respectful treatments of all members of the College community and those who conduct business with the College.

Purpose

The purpose of this policy is to encourage and enable good-faith reports by College employees and others who have good-faith serious concerns about misconduct, including violations of the law, regulations of College policies and procedures or other conduct (“Misconduct”) to raise them with the College before seeking external resolution. This policy is not intended to supplant, but rather to complement and supplement, existing College policies. It does not affect any rights, responsibilities or procedures set forth in other College policies addressing misconduct. For example, complaints or grievances such as those regarding discrimination or harassment, other personnel or employment matters, academic and disciplinary matters, and other matters as to which there are specific College policies, should ordinarily be made and addressed in accordance with the College policies applicable to such matters and applicable law.

Reporting Responsibility

Each member of the College community shares responsibility for stewardship of College resources and compliance with laws and policies. Therefore, LBC faculty, staff and students are encouraged to report, in accordance with this policy, and suspected misconduct by College employees, or actions of other parties that may result in financial loss or other harm to Lancaster Bible College, of which they become aware. For purposes of this policy, a reporting person is any employee, volunteer or student who makes a report under this policy.

Guidance on Reporting

An employee who has a question about the propriety of any practice under College policies or procedures should ordinarily seek guidance from his or her supervisor, or the Director of People Development and Human Resources. An employee also may seek guidance from a Senior Administrator, including the President.

Confidentiality

A reporting person may make an anonymous report. However, it should be understood that any investigation may be hampered or be impracticable if the reporting person cannot be identified and questioned about the allegations and related facts.

Persons to Whom Reports May Be Made

A reporting person ordinarily should make the report to his or her immediate supervisor. If the reporting person believes it inappropriate to report to an immediate supervisor, the reporting person should raise the issue with another person with supervisory authority, such as his or her department head or the Director of People Development and Human Resources. If a reporting person believes further reporting is appropriate, a report under this policy may be made to a Senior Administrator, including the President.

Reports involving the President, a Vice President or a trustee of the College, or any report concerning accounting practices, finances, internal controls, inappropriately managed conflicts of interest and/or auditing may be submitted to the Chair of the People Development Committee.

No Retaliation

No individual who in good faith reports a violation or suspected violation shall thereby suffer harassment, retaliation or adverse employment and/or academic or educational consequence. An employee who retaliates against someone who has made a report in good faith under this policy is subject to disciplinary action, up to and including dismissal from the College. Individuals who believe they have suffered retaliation may report it to one of the reporting venues identified above.

Reports made in bad faith or with knowledge of their falsity may subject individuals to disciplinary or other appropriate action. Making a report under this policy shall not insulate an individual from personnel or other actions that are warranted based on performance or other factors and are not caused by the making of a complaint under this policy.

Approval: (1)

Approved by the President's Cabinet (10/11/2010) and the President

President Peter W. Seogye Date 10/11/10

Implementation: Director of People Development and Human Resources