Student Senate of the State University of New York at Delhi

WHISTLEBLOWER POLICY

General

The Student Senate of the State University of New York at Delhi (STUDENT SENATE) is committed to lawful and ethical behavior in all of its activities and requires officers, directors, members and employees to act in accordance with all applicable laws, regulations and policies and to observe high standards of business and personal ethics in the conduct of their duties and responsibilities.

The objectives of the Student Senate’s Whistleblower Policy are to establish policies and procedures to:

- prevent or detect, and correct improper activities;
- encourage each STUDENT SENATE director, officer, member, and employee to report what he or she in good faith believes to be a material violation of law or policy or questionable accounting or auditing matter by STUDENT SENATE;
- ensure the receipt, documentation, retention of records, and resolution of reports received under this policy;
- protect reporting individuals from retaliatory action.

Reporting Responsibility

Each reporting individual has an obligation to report what he or she believes is a material violation of law or policy or any questionable accounting or auditing matter by STUDENT SENATE, its officers, directors, members, employees or other representatives. Reporters must also notify STUDENT SENATE if an action needs to be taken in order for STUDENT SENATE to be in compliance with law or policy or with generally accepted accounting practices. The types of concerns that should be reported include, for purposes of illustration and without being limited to, the following:

- providing false or misleading information on STUDENT SENATE’s financial documents, reports, tax returns or other public documents;
- providing false information to, or withholding material information from STUDENT SENATE’s auditors, accountants, lawyers, directors or other representatives responsible for ensuring STUDENT SENATE’s compliance with fiscal and legal responsibilities;
- embezzlement, private benefit, or misappropriation of funds;
- material violation of STUDENT SENATE policy, including among others, confidentiality, conflict of interest, whistleblower, ethics and document retention;
- discrimination based on race, gender, sexual orientation, ethnicity, and disability;
- facilitation or concealing any of the above or similar actions;

Reporting Concerns:

Whenever possible, employees/student senators/club members/advisors (members) should seek to resolve concerns by reporting issues directly to his/her club advisor/supervisor, or to
the next level of management, as needed until matters are satisfactorily resolved. However, if for any reason a student is not comfortable speaking to an advisor or does not believe the issue is being properly addressed, the employee may contact the Director of Student Activities, Assistant Director of Student Activities, or the President of STUDENT SENATE. Whenever practical, reports should be in writing.

**Directors and Members**

Members may submit concerns to the President of the Student Senate or any individuals mentioned above. Current contact information is as follows:

- **Director of Student Activities** – John Huber, 222 Farrell Hall, 607-746-4567
- **Assistant Director of Student Activities** – Bari Marshall, 222 Farrell Hall, 607-746-4841
- **President of Student Senate** – Justina Lopez,

Concerns may be submitted anonymously. Because it is impossible to seek additional information from a reporting individual about anonymous reports, it is essential that such reports contain as much specific information as possible.

**Handling of Reported Violations**

STUDENT SENATE will investigate all reports filed in accordance with this policy with due care and promptness. Matters reported internally, without initial resolution, will be investigated by the General Manager of STUDENT SENATE to determine if the allegations are true, whether the issue is material, and what actions, if any, are necessary to correct the problem. STUDENT SENATE staff will issue a full report of all matters raised under this policy to the President of the Board of Directors. The President of the Board of Directors may conduct a further investigation upon receiving the report from the General Manager.

For matters reported directly to the President of the Student Senate, the President shall promptly (generally within five business days) acknowledge receipt of the complaint to the complainant, if the identity of the complainant is known, and conduct an investigation to determine if the allegations are true and whether the issue is material and what, if any, corrective action is necessary. Upon the conclusion of this investigation, the President of the Student Senate shall promptly report its findings to the full Executive Board.

**No Retaliation**

This Whistleblower Policy is intended to encourage and enable members, officers and employees, advisors and students to raise serious concerns within the organization for investigation and appropriate action. With this goal in mind, no member, officer, advisor, student or employee who, in good faith, reports a concern shall be threatened, discriminated against or otherwise subject to retaliation or, in the case of an employee, adverse employment consequences as a result of such report. Moreover, an employee who retaliates against someone who has reported a concern in good faith is subject to discipline up to and including termination of employment.
Acting in Good Faith

Anyone reporting a concern must act in good faith and have reasonable grounds for believing the matter raised is a serious violation of law or policy or a material accounting or auditing matter. The act of making allegations that prove to be unsubstantiated, and that prove to have been made maliciously, recklessly, with gross negligence, or with the foreknowledge that the allegations are false, will be viewed as a serious disciplinary offense and may result in discipline, up to and including termination of employment. Depending on the circumstances, such conduct may also give rise to other actions, including civil or criminal lawsuits.

Confidentiality

Reports of concerns, and investigations pertaining thereto, shall be kept confidential to the extent possible. However, consistent with the need to conduct an adequate investigation, STUDENT SENATE cannot guarantee complete confidentiality. Disclosure of information relating to an investigation under this policy by STUDENT SENATE, directors, or others involved with the investigation of concerns to individuals not involved in the investigation will be viewed as a serious disciplinary offense and, with respect to STUDENT SENATE employees, may result in discipline, up to and including termination of employment. Depending on the circumstances, such conduct may also give rise to other actions, including civil or criminal lawsuits.

I have read, understand and will abide by the Whistleblowers Policy detailed above.

JBH, et al

(please print name here)

Signature

Date

Established: December __, 2012

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(607)746-4765 phone