

# Whistleblower Policy

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## *Human Resources Policy Manual*

**Section:** Communications

**Policy:** HR1302 Whistleblower

**Responsible Office:** Human Resources

**Establishment Date:** 07/18/2023

**Revision Date:** 07/18/2023

**Adoption Date:** 05/14/2024

### Eligibility

This policy applies to all current and former employees, regardless of employment definition and status.

### Policy

Cornell Cooperative Extension of Madison County expects all employees maintain the highest standards of professionalism, compliance, integrity and execution of fiscal responsibilities in the performance of their job duties and while representing the association.

**Whistleblower:** Association employees are encouraged to report any good faith suspicion of fraudulent activities. These reports will be considered protected activities (whistleblowing) and employees will not be retaliated against with any adverse employment decisions. When an employee makes a good faith report of an activity that is suspected of being fraudulent, illegal, or in violation of government regulations or association policies, they will be considered a whistleblower.

The following is a list of examples of violations (not inclusive) that may fall under whistleblower protection:

- financial wrongdoing, irregularities, fraud, theft, embezzlement, bribery, misuse of assets;
- conflict of interests that create tangible or intangible benefits;
- any unethical conducts on behalf of the association; and
- violations of any federal, state, or local laws.

### Procedures

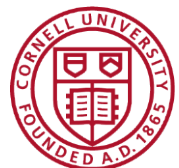
#### **Whistleblower Report:**

The association encourages employees to report in good faith any activity that is suspected of being fraudulent, illegal, or in violation of government regulations or association policies.

These whistleblower reports should be made to their immediate supervisor, Executive Director, or using the anonymous hotline **HR One at 1-800-457-8829**.

The association should take timely steps to investigate all reports when applicable. The association will ensure reasonable steps are taken to keep the context of such complaint and the identity of the individual who files a complaint confidential.

The confidentiality and anonymity of the whistleblower will be subject to the need to conduct an appropriate investigation.



At the completion of the investigation, the association will inform the employee who made the whistleblower report of a final decision in a timely manner.

## Key Definitions

*The following definitions apply to terms used for the purposes of this policy:*

**Retaliation:** an adverse employment decision to the terms or conditions of employment when an employee is engaging (or is perceived to engage) in protected activities. *A negative employment action is not retaliatory merely because it occurs after the employee engages in protected activity. Investigation and deliberation of case-specific facts will be used to determine the merit of each case. Employees continue to be subject to all job requirements and disciplinary rules after having engaged in protected activity.*

**Adverse Employment Decision:** may include, but is not limited to, the following actions:

- reprimanding an employee or giving them a performance evaluation that is lower than it should be;
- transferring an employee to a less desirable position;
- engaging in abusive verbal or physical behavior that is reasonably likely to deter protected activities;
- threatening to make, or making reports to authorities (such as reporting immigration status or contacting the police);
- increase job scrutiny;
- giving an unfavorable reference upon (or after) termination; and
- making the employee's work more difficult (i.e., punishing an employee for a complaint by purposefully changing their work schedule to conflict with family responsibilities).

**Good faith reporting:** Requires that a whistleblower have an honest and reasonable belief that a violation has already occurred or will occur. A report may be initiated in good faith regardless of whether the complaint is ultimately disproved. A report is not in good faith if made with reckless disregard for or willful ignorance of facts that would disprove the report.

