



**THE COLLEGE CRUSADE**  
**OF RHODE ISLAND**

**POLICY ON REPORTING AND INVESTIGATING ALLEGATIONS  
OF IMPROPER CONDUCT**

**I. INTRODUCTION**

The College Crusade of Rhode Island is responsible for the proper use of its resources and the public and private support that furthers the realization of its mission. The Crusade is committed to conducting its affairs in full compliance with the law and with its own policies and procedures. Such adherence strengthens and promotes ethical and fair practices and treatment of all members of the Crusade and those who conduct business with the Crusade.

Employees and other persons holding positions of fiduciary duty with the Crusade are obligated to perform these duties in compliance with all applicable laws and Crusade policies and procedures.

The Crusade has developed and implemented internal controls and procedures that are intended to prevent or deter improper conduct. There may, nonetheless, be both intentional and unintentional violations of laws, regulations, policies and procedures. The Crusade has a responsibility to investigate and, where appropriate, report allegations of suspected improper conduct.

This policy governs reporting and investigations of allegations of suspected improper conduct.

The Crusade encourages employees and others having a fiduciary relationship to the Crusade to use the guidance set forth in this policy to report any and all allegations of suspected improper conduct. This Policy provides for confidentiality, and confirms that any person who makes a good faith report of suspected improper conduct or who participates in the investigations of such a report will be protected from retaliation by the Crusade or anyone within its control.

It is not intended that this policy alter in any fundamental aspect the responsibility for conducting investigations, but to provide guidance on how reports of suspected misconduct can be made. Individual employee grievances and complaints concerning terms and conditions of employment will continue to be reviewed in accordance with applicable human resources policies. Any allegations of improper conduct that may result in disciplinary action against an employee or others having a fiduciary relationship to the Crusade shall be coordinated with the applicable policies. In all cases, the Crusade shall exercise its discretion in determining when circumstances warrant investigation and, in compliance with this policy, the appropriate investigative process to be employed.

Finally, this policy is subject to the direct oversight of the Finance and Administration Committee of the Board of Directors

## II. DEFINITIONS

For purposes of this policy the following terms shall have these meanings:

**A. Crusade Resources** shall include, but not be limited to the following, whether owned by or under the management or control of the Crusade:

- Cash and other assets, tangible or intangible, real or personal property;
- Receivables and other rights or claims against third parties;
- Intellectual property rights;
- Facilities and the rights to use Crusade facilities;
- The College Crusade of Rhode Island's name, associated symbols, logos or service marks; and
- Crusade records

**B. Chair of the Finance and Administration Committee** is a Crusade Director who has independence within the Crusade community, is knowledgeable concerning Crusade resources and procedures, and can assure that there is a fair and impartial investigation of allegations of improper conduct and that the outcome of the investigation will be based on the merits.

**C. Improper Conduct** is any action or activity by an employee others having a fiduciary relationship to the Crusade that is undertaken in the performance of the person's official duties or with the appearance or representation that it is undertaken in the performance of official duties, whether or not the action or activity is within the scope of his or her employment or other jurisdiction, and that: (1) is in violation of any federal or state law or regulation, including, but not limited to, corruption, malfeasance, bribery, theft, fraudulent claims, fraud, coercion, conversion;

(2) constitutes misuse or misappropriation of Crusade property or willful omission to perform a duty or is a knowing violation of a Crusade policy, procedure, rule or regulation; (3) is economically wasteful or involves gross misconduct, incompetence or inefficiency or creates for the Crusade potential exposure to liability and financial irregularities; (4) reasonably appears to be the result of a criminal act; (5) is a significant threat to the health or safety of members of the Crusade community; (6) is scientific misconduct; (7) is an unauthorized invasion, alteration or manipulation of records and computer files; or (8) is in pursuit of a benefit or advantage in violation of the Crusade's conflict of interest policy; (9) interferes with a Crusade investigation conducted in accordance with this policy, including the withholding, destruction or tampering with evidence or any effort to influence, coerce, intimidate or retaliate against Whistleblowers or witnesses

**D. Protected Disclosure** is any report, communication or other disclosure that may evidence Improper Conduct, if made in good faith for the purpose of correcting the conduct or while participating in an investigation of Improper Conduct.

**E. Whistleblower** is a person who makes a Protected Disclosure pursuant to this policy.

### **III. Reporting Allegations of Suspected Improper Conduct**

#### **A. Filing a Report**

1. Any person may report allegations of suspected improper conduct. Anonymous reports may be made. Persons wishing to make an anonymous report should call the Chairperson of the Board of Directors, Paul Moran at 401-654-5014 or contact him, by e-mail at pmoran@yksmcpa.com. An anonymous report must include sufficient corroborating evidence to justify initiating an investigation.

2. The Crusade encourages reports of allegations of Improper Conduct to be made in writing, so that there is a clear understanding of the issues raised however, oral reports may be made. Reports should focus on facts, and avoid speculations and drawing conclusions. Including as much specific information as possible will facilitate the evaluation of the nature, extent and urgency of preliminary investigative procedures.

3. The Crusade recommends that persons who are not employees of the Crusade make reports to the Chair of the Finance and Administration Committee. Such reports may also be

made to another Crusade official whom the reporting person may reasonably expect to have either responsibility or authority over the affected area.

4. Employees of the Crusade may report allegations of Improper Conduct to the employee's immediate supervisor, any other appropriate administrator or supervisor within the operating unit or to the Chair of the Finance and Administration Committee.

5. The allegation of suspected improper conduct may be reported at any time but the longer the delay the more difficult it may become for the Crusade to appropriately respond.

#### **IV. Investigating Alleged Improper Conduct**

**A.** The Chair of the Finance and Administration Committee shall oversee all investigations reported directly to him or her and may enlist the efforts of the appropriate units within the Crusade to conduct the investigation or may solicit investigative services outside of the Crusade.

In addition, the Chair of the Finance and Administration Committee shall:

1. ensure that all appropriate reporting to the Chief Executive Officer, and regulatory agencies, Whistleblowers, and others, as necessary takes place;
2. ensure that all appropriate administrative and senior officials are apprised of the allegations, as necessary;
3. ensure that appropriate resources and expertise are allocated in order to effect a timely, comprehensive and objective investigation;
4. ensure that there are no conflicts of interest on the part of any party involved in specific investigative units;
5. monitor the progress of the investigation; and
6. coordinate and facilitate as an advisor in determining the corrective and remedial action to be taken. The appropriate Crusade official shall determine the corrective and remedial action to be taken.

**B.** Improper Conduct reported to administrative personnel other than the Chair of the Finance and Administration Committee shall be conducted in accordance with the above-outlined standards and no less than quarterly the Chief Executive Officer shall report to the Chair of the Finance and Administration Committee on the status and existence of any reports of Improper Conduct.

## **V. Protection Against Retaliation**

Whistleblowers and others who make Protected Disclosures in good faith shall not be retaliated against in any manner, with the intent of adversely affecting the terms or conditions of their employment or other relationship to the Crusade. This protection from retaliation shall not, however, immunize persons from appropriate discipline or other administrative actions for performance-related or other factors not related to the Protected Disclosure.

Whistleblowers and others who believe they are the subject of prohibited retaliation should promptly report such actions to the Chair of the Finance and Administration Committee. Nor does it immunize persons who make claims in bad faith which are false from appropriate sanctions.

## **VI. Oversight of Finance and Administration Committee**

The administration of this policy is subject to the direct oversight of the Finance and Administration Committee of the Board of Directors.

## **VI. Destruction of Records Prohibited**

No employee, officer or Director, or other person acting on their behalf shall alter, destroy, mutilate, or conceal a The College Crusade of Rhode Island or affiliate, record or document with intent to impair its integrity or availability for use in an official proceeding. All Crusade records shall be maintained in accordance with the Crusade's Records Retention Policy.