



## Whistleblower Protection Policy

Approved by the Board of Regents on October 13, 2016

### I. Policy Overview

Life Chiropractic College West (“LCCW”)’s Mission, Goals and Objectives require its Board of Regents (board members), officers, employees, students, volunteers and interns to observe the highest standards of professional and personal ethics in executing their duties and responsibilities to LCCW. As members of LCCW’s community, we must exhibit honesty and integrity in fulfilling our responsibilities and comply with all applicable laws, regulations, rules and policies. This policy sets forth LCCW’s requirements regarding the disclosure of an actual or potential violation of the law and protects board members, employees, volunteers, students, alumnae and applicants from retaliation in the form of an adverse employment action or other action for disclosing what the member of our community reasonably believes is an actual or possible violation of the law. This Whistleblower Protection Policy is intended to encourage and enable any person to raise serious, fact-based concerns in good faith within LCCW and prior to seeking resolution outside LCCW.

### II. Statement of Policy

It is LCCW’s policy to encourage the reporting of misconduct that may violate federal and/or state law(s). No board member, officer, employee, student, volunteer, intern or alumnus, who, in good faith and with a reasonable basis, (1) reports to a supervisor, LCCW Administrator, board member or to a federal, state or local agency what the employee believes to be in good faith a violation of the law; (2) participates in good faith in any resulting investigation or proceeding; or (3) exercises his or her rights under any federal or state law(s) or regulation(s) to pursue a claim or take legal action shall suffer retaliation or any adverse employment action or other action as a result of the report.

All reports will be investigated promptly. In conducting an investigation, LCCW will aim to keep the identity of the complaining party as confidential as possible while conducting an appropriate and comprehensive investigation.

Retaliation for disclosures made under this policy, or intentionally providing false information regarding an actual or potential violation of this policy, may result in discipline, suspension, termination or any other action LCCW deems appropriate. “Retaliation” includes discriminating against, mistreating or taking adverse employment action against someone who has made a complaint under this policy or raised any concern under this policy, or who referred a matter for investigation or who participated in a complaint, investigation or hearing process under this policy. “Adverse employment action” is discharge, demotion, suspension, being threatened or harassed or in any manner discriminated against with respect to compensation, or terms or conditions of employment or participation in LCCW activities. Other adverse actions include suspending, dismissing or disciplining a student or changing or lowering a grade or

evaluation of a student or in any manner negatively impacting the student's academic career and discriminating against or mistreating alumni, volunteers or interns.

This policy is not intended to and does not prohibit an employment action or other action that would have been taken regardless of the disclosure of information or a complaint or concern raised under this policy.

### **III. Reporting Violations**

If a board member, officer, employee, volunteer, student, vendor, alumnus or applicant has a reasonable belief that a member of the LCCW community has engaged in any action that he or she reasonably believes constitutes misconduct that may violate federal and/or state law(s), or constitutes a fraudulent practice, the individual is expected to immediately report such information to the Director of Human Resources either in person or by telephone at (510) 780-4541. For any allegations regarding fraudulent behavior with respect to financial or accounting matters, please contact the Chief Financial Officer either in person in the Executive Offices or by telephone at (510) 780-4543. If the complainant does not feel comfortable reporting the information to the Director of Human Resources or Chief Financial Officer, he or she is expected to report the information to a campus conduct hotline at 510-780-4564.

If a board member, officer, employee, student, volunteer, intern or alumnae provides knowingly false information in relation to a complaint, investigation, hearing or other event under this policy, or intentionally withholds information without an appropriate basis for doing so, he or she will be subject to disciplinary action, up to and including termination or expulsion.

### **IV. Investigation**

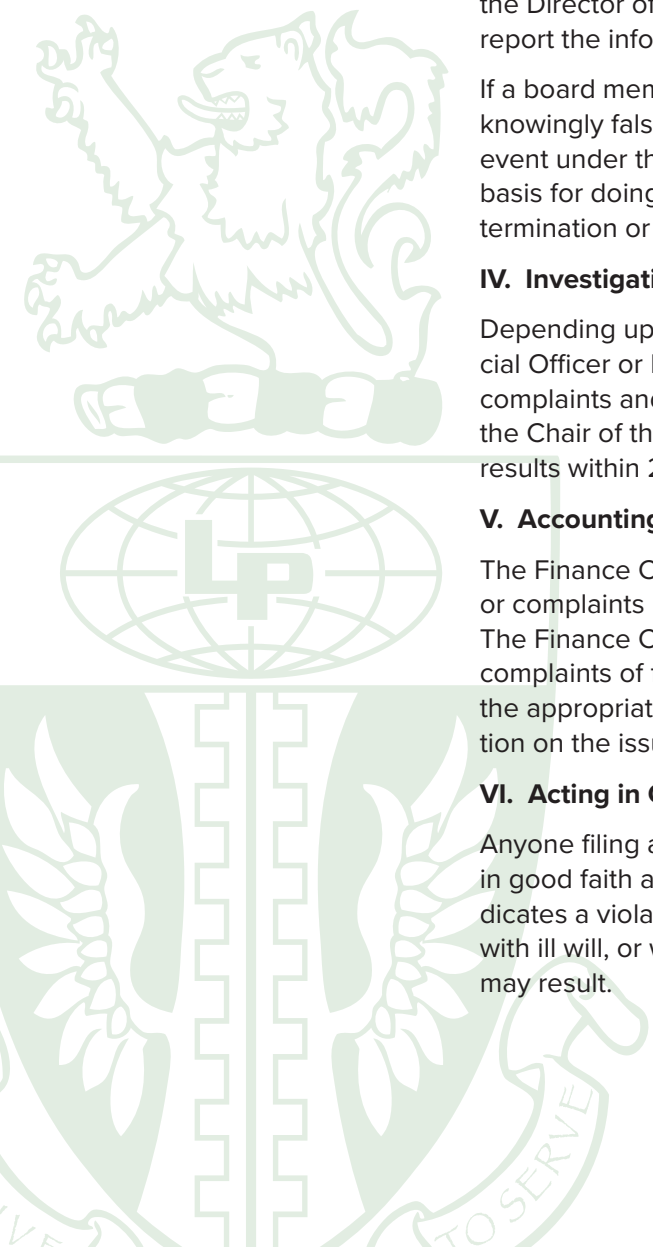
Depending upon the subject matter, the Director of Human Resources, Chief Financial Officer or his/her designee is responsible for investigating and resolving reported complaints and allegations concerning violations and shall advise the President or the Chair of the Board of Regents and the Executive Committee of the investigation results within 21 days of the reported concern or complaint.

### **V. Accounting and Auditing Matters**

The Finance Committee of the Board of Regents shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The Finance Committee will be notified within ten business days after receipt of any complaints of fraudulent behavior with respect to financial or accounting matters, and the appropriate administrator will work with the Finance Committee to reach a resolution on the issue.

### **VI. Acting in Good Faith**

Anyone filing a complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. If it is determined that any unsubstantiated allegations were made with ill will, or were stated with knowledge of the allegations falsity, then discipline may result.



## **VII. Confidentiality**

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Anonymous reports must include sufficient specific facts to enable LCCW to investigate the matter. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the requirements of law and regulations and the need to conduct an adequate investigation.

## **VIII. Handling of Reported Violations**

The initial recipient of a complaint will acknowledge receipt of the reported violation or suspected violation within ten business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

