



NORTHWEST ARKANSAS COMMUNITY COLLEGE ETHICS POLICY

College Vision Statement

NorthWest Arkansas Community College intends to be a nationally recognized two-year comprehensive institution that excels in providing community, transfer, and workplace education in a learning-centered environment.

Code of Conduct

NorthWest Arkansas Community College is committed to compliance with the laws and regulations to which it is subject and to the policies and procedures established by the College. In order to encourage ethical conduct and strengthen and promote ethical practices among College employees, members of the greater College community and those who conduct business with the College, NorthWest Arkansas Community College hereby adopts this Code of Conduct. This Code of Conduct is an integral part of the College Ethics Policy and Procedures, which includes the College Vision statement. NorthWest Arkansas Community College believes that a shared statement of ethical values will strengthen the overall quality of the College community, promote proper conduct among College employees and is vital to the pursuit of the College Vision.

As an employee of a learning-centered College and in pursuit of its Vision, NorthWest Arkansas Community College employees shall:

- Act with academic, professional and personal integrity.
- Act in a way that promotes healthy working relationships based on mutual trust and support among one's fellow employees.
- Perform one's responsibilities with integrity; avoiding conflicts of interest and disclosing those that occur.
- Act so as to value human beings over other assets of the College.
- Be honest and fair in the practice of employee responsibilities at the College.
- Use one's position at the College for the benefit of the entire College and not to benefit oneself or any other individual or agency.

- Respect differences of opinion and approaches to issues and problems and view them as strengths.
- Always keep in mind the legal limitations of the authority one has as a College employee and conduct one's relationships with other employees, citizens of the community, media and those doing business with the College based on those limitations.

Education and Training

NorthWest Arkansas Community College shall initiate and maintain an ethics education and training program for all employees. This program shall be tailored to the needs of College employees and shall be planned and carried out in cooperation with the office of professional development and other appropriate departments at the College. This program shall be evaluated at least annually to assure that it is meeting the needs of the College employees and the College.

Reporting Possible Violations

NorthWest Arkansas Community College shall establish and maintain procedures for employees to report alleged violations of the Code of Conduct. These procedures shall provide a means for reporting alleged violations through normal management channels and through other channels whereby anonymity and confidentiality may be maintained.

College Response

NorthWest Arkansas Community College shall establish and maintain procedures to be used in responding to, investigating and resolving each alleged violation of the Code of Conduct that is reported through management or the other reporting options.

NORTHWEST ARKANSAS COMMUNITY COLLEGE ETHICS PROCEDURES

Reporting Possible Violations Procedures

To report possible violations of the Code of Conduct, employees are encouraged to do one of the following:

1. Report to Management- Alleged violations may be reported initially through standard management channels, beginning with one's immediate supervisor. If for any reason it is not appropriate to report possible violations to the immediate supervisor, individuals may go to a higher level of management within their department or division.
2. Other Report Options- To the extent that reporting alleged violations through standard management channels is not feasible or appropriate or if a College employee desires to use a different reporting option, employees may use two additional reporting methods to report alleged violations and maintain confidentiality and anonymity, if desired.

- Alleged violations may be reported via the Web to a Helpline web site established by the College but operated independently of the College by a third party organization.
- Alleged violations may be reported via the College's ethics reporting telephonic Helpline operated independently of the College by a third party organization.

College Response Procedures

All alleged violations will be confidentially forwarded from College management or the third party organization to the College Ethics Compliance Officer who will screen the information for legitimacy and, if found legitimate, then will assign it to an appropriate investigator at the College for investigation.

In order to protect the integrity of the investigative process, in no instance will a College employee who is specifically named in the complaint serve as Ethics Compliance Officer or investigator for that particular complaint.

If the report is deemed by the Ethics Compliance Officer not to be legitimate because it does not fall within the purposes of the Ethics Reporting Program, that information will be forwarded to the person reporting the possible violation. If the report is legitimate an investigator will be assigned to the case by the Ethics Compliance Officer. The investigator assigned to investigate a particular report shall have sufficient general knowledge and understanding of the subject matter of the complaint to qualify as an investigator. Generally, the investigator shall work in an area of the College related to the subject of the complaint. The following guidelines and principles will be followed in the investigation:

- **Protection for Persons Making a Report.** Retaliation for raising a good faith concern of a law, policy or Code of Conduct violation is prohibited. The College will make reasonable efforts to assure that this protection is provided.
- **Protection for Subjects of a Report.** Individuals who are subjects of a report shall be treated fairly, respectfully, and consistent with all protections set out in College policy or law. To assure fair treatment, those accused in a report should be notified about the nature of the allegations by the investigator responsible for the investigation. Reasonable efforts will be made to maintain the confidentiality of the reporting party unless the reporting party agrees to disclosure. The Subject shall be kept informed of the progress of the investigation.
- **Maintain Confidentiality.** All individuals who become aware of allegations as a part of the investigation of a report shall respect the confidentiality of the person raising the allegations, individuals who are the subjects of the allegations, other persons named in the report or

involved in the investigation, and any confidential or private data disclosed in the report.

Once assigned the report, the investigator shall promptly contact the reporter and discuss with the reporter if they believe the issue can be resolved using the “informal investigation model”. If the answer is affirmative, then the investigator will proceed with the investigation using that model. If the answer is negative the investigator will proceed with the investigation using the “formal investigation model. The “informal investigation model” shall not be used in reports of fraud, missing funds, or potentially criminal activity. The formal investigation model must be used in reports of this nature.

Informal Investigation Model

Using this model the investigator will discuss the issue with the reporter, either using the EthicsPoint Reporting System or in person, to determine the details of the report, and who else may be involved in the report. The investigator will seek to find a solution to the problems raised by the reporter, speaking with other parties discern what an appropriate solution would be. The investigator, with the approval of the parties, will help draft a solution to the problem and present it to the Cabinet member to whom the reporting party reports. The Cabinet member shall review the solution, either approve it or work with the parties to draft an acceptable solution. Once the parties agree to the solution, the Cabinet member shall report that to the College President and to the Ethics Compliance Officer, who is monitoring the case. The Ethics Compliance Officer shall then close the case.

Formal Investigation Model

Using this model the investigator shall thoroughly investigate the issues raised in the report, collecting as much information as possible related to the report and attempting to determine the validity of the report’s allegations. As part of the investigation, the investigator shall contact the subject(s) of the report, and other College employees or other persons who may have information related to the report. If necessary and with the approval of the respective Cabinet member, the investigator may use other appropriate administrative personnel as part of an investigative team for a particular investigation.

Investigators investigating reports shall communicate the progress of their investigations to their respective College Cabinet member as the investigation progresses. If the respective College Cabinet member is a party to the report, this communication shall take place with the College Compliance Officer.

Upon the completion of the investigation, the investigator shall report the findings to the Ethics Compliance Officer, who shall forward the case and the findings to the appropriate College Cabinet member for review. The College Cabinet member may direct that additional investigation be done and/or shall recommend to the College President, or designee at the time, appropriate action based on current College Policy, State or Federal law or regulations or other appropriate criteria. Such action may include but is not limited to discipline of College employees or corrective actions including evaluation of whether

there is a systemic problem and whether programs, education, policies, or oversight activities should be modified to prevent similar incidents.

The College President, or designee at the time, shall receive the recommendation of the Cabinet member and shall make the final decision in each case. The President's or designee's at the time decision shall be considered final.

The respective Cabinet member shall ensure the decision of the President is implemented, the rights of parties involved are protected, and other appropriate senior management within the college or department involved is notified of the issue and resolution, and that proper documentation is maintained.

January, 2008