

WHISTLEBLOWER POLICY

I. ENCOURAGEMENT OF REPORTING

The Foundation encourages complaints, reports or inquiries about illegal practices or serious violations of the Foundation's policies, including illegal or improper conduct by the Foundation itself, by its leadership, or by others on its behalf. Appropriate subjects to raise under this policy would include financial improprieties, accounting or audit matters, ethical violations, or other similar illegal or improper practices or policies. Other subjects on which the Foundation has existing complaint mechanisms should be addressed under those mechanisms, such as raising matters of alleged discrimination or harassment via the Foundation's Executive Committee, unless those channels are themselves implicated in the wrongdoing. This policy is not intended to provide a means of appeal from outcomes in those other mechanisms.

II. PROTECTION FROM RETALIATION

The Foundation prohibits retaliation by or on behalf of the Foundation against Board Members and Midland College employees assigned to the Foundation for making good faith complaints, reports or inquiries under this policy or for participating in a review or investigation under this policy. This protection extends to those whose allegations are made in good faith but prove to be mistaken. The Foundation reserves the right to discipline persons who make bad faith, knowingly false, or vexatious complaints, reports or inquiries or who otherwise abuse this policy.

III. WHERE TO REPORT

Complaints, reports or inquiries may be made under this policy on a confidential or anonymous basis. They should describe in detail the specific facts demonstrating the bases for the complaints, reports or inquiries. They should be directed to the President of the Board or Directors; if this person is implicated in the complaint, report or inquiry, it should be directed to Vice President. The Foundation will conduct a prompt, discreet, and objective review or investigation. Staff or volunteers must recognize that the Foundation may be unable to fully evaluate a vague or general complaint, report or inquiry that is made anonymously.

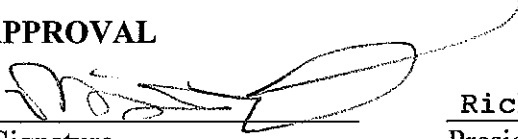
IV. ATTACHMENTS

V. DISTRIBUTION

Bylaws and Administrative Policy Manual

VI. APPROVAL

Signature



Richard McMillan
President

10/29/2009
Date

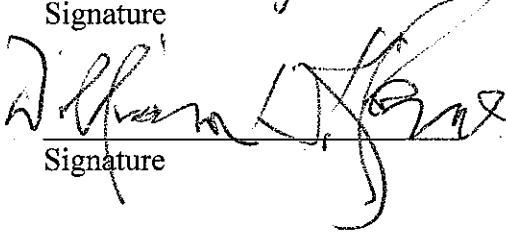
Signature



Glenn A. Rogers
Vice President

10/29/09
Date

Signature



William D. Kleine
Secretary

10/29/2009
Date

VII. POLICY RESPONSIBILITY IN COORDINATION WITH:

Midland College President

Midland College Human Resources-Administers
Legal Counsel-Interprets

VIII. REVISIONS

Statement of Rights As Follows:

Midland College Foundation, Inc. reserves the right unilaterally to revise, modify, review, rescind, or alter the terms and conditions of this policy within the constraints of the law by giving reasonable notice.

IX. DATE

Origination: October 29, 2009

Last Policy Review: _____

Next Policy Review: October 2011
(Every Two Years)