



Policies and Procedures Manual

Title: Financial Misconduct Policy
Policy Administrator: General Counsel
Effective Date: Feb-01-2010
Approved by: President of the College

Purpose:

This document is intended to inform the College Community of policies and procedures regarding Financial Misconduct.

Policy:

1.0 Overview

The College of the Holy Cross, as a Jesuit, Catholic institution of higher education seeks to build a community marked by freedom, mutual respect, and civility. The College is committed to excellence and integrity and strives to carry out its mission in accordance with the highest ethical standards and in compliance with all applicable laws, rules, and regulations. It is dedicated to educating students to live by the highest ethical standards in their personal, professional and civic lives. Inherent in these standards is the expectation that Community Members will carry out their duties in an ethical manner with honesty, integrity and respect for the rights of others.

2.0 Applicability

It is with these standards in mind that the College has established this Policy on Financial Misconduct. It is intended that this Policy will guide the actions of members of the College Community in carrying out their roles and responsibilities with respect to all financial/budget matters. This policy is applicable to those faculty members, staff, student employees and representatives, and individuals who may provide volunteer services to the College, who have any form of financial and/or budget responsibilities.

3.0 Ethical Standards

3.1 Confidentiality

In carrying out their various responsibilities at the College, Community Members may have access to various sources of confidential or sensitive information. Confidential

information includes personnel files, financial statements, reports or plans and student records. It also includes information that third parties have entrusted to the College. This information may only be used by Community Members in the direct performance of their job responsibilities. Moreover precautions must be taken to ensure that confidential information is properly safeguarded. Confidential information should not be disclosed to other Community Members or to individuals or organizations outside the College unless specifically authorized by an appropriate officer of the College or as required by law. The President, Vice Presidents, General Counsel, and Directors who report to the President, are the only individuals authorized to release such information in accordance with this policy.

3.2 Compliance with Laws, Rules and Regulations

Community Members must conduct College business in compliance with all local, state and federal laws and regulations. Community Members are responsible for understanding and complying with applicable laws, rules and regulations that pertain to their areas of responsibility.

3.3 Compliance with College Policies and Procedures

Community Members shall perform their responsibilities in compliance with all College policies. If a Community Member has a question on the interpretation of a policy, he or she should consult with their immediate supervisor or the office responsible for issuing and enforcing the policy.

3.4 Conflicts of Interest

A conflict of interest occurs when a Community Member's direct or indirect personal interest is inconsistent with or interferes with the best interest of the College. Please refer to the [College's Conflict of Interest Policy](#) for further information on conflict of interest limitations and reporting requirements. The College expects that all decisions made and actions taken by Community Members on behalf of the College are made for the sole purpose of advancing the best interests of the College without regard for personal gain or circumstance.

3.5 Protection and Proper Use of College Assets

Safeguarding College assets is of paramount importance. Any suspected incident of improper financial reporting, lack of financial or operating controls, significant accounting deficiencies, misappropriation of funds, theft or fraud, or the unauthorized use of College-owned equipment/assets, should be reported immediately.

3.6 Guiding Principles

Given the variety and complexity of ethical questions that may arise from time to time in carrying out the College's activities, it is difficult to anticipate each unique circumstance that may occur or whether a unique set of circumstances constitute a violation of ethical conduct. As such, the above ethical standards are in no way intended to include all

possible examples of ethical conduct violations. The primary guiding principle for Community Members is to conduct all of their affairs with a commitment to excellence and integrity and in keeping with the College's mission statement and values.

4.0 Reporting Suspected Violations

Community Members should familiarize themselves with this policy and all College policies and procedures. If a Community Member suspects that a violation of this policy has occurred, the Community Member is strongly encouraged to report the incident. The College has established a [Whistle Blower Policy](#) that provides guidance on reporting such violations.

5.0 Enforcement

Community Members who violate this policy are subject to disciplinary action, including possible termination, suspension and/or expulsion from the College.

Forms:

Title
Title

Related Information:

Title: Whistle Blower Policy
Title: Conflict of Interest Policy

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Date of Last Review Feb-01-2013