2.0 LEGAL AUTHORITY

The Board of Trustees, in accordance with the University's By-Laws, is responsible for the protection of the University's interests and assets. The Board is authorized to take action in accordance with applicable laws and policies and procedures to provide a mechanism for the reporting of illegal activity. The Board is also responsible for ensuring compliance with the University's policies and procedures for the reporting of illegal activity. The Board is authorized to conduct its affairs in full compliance with the By-Laws, policies and procedures of the University.

1.0 PURPOSE

The Board of Trustees established Policy No. CAC-01-2013-2014.

**English**

2014

2.0 BASE LEGAL

The Board of Trustees is responsible for the protection of the University's interests and assets. The Board is authorized to take action in accordance with applicable laws and policies and procedures to provide a mechanism for the reporting of illegal activity. The Board is also responsible for ensuring compliance with the University's policies and procedures for the reporting of illegal activity. The Board is authorized to conduct its affairs in full compliance with the By-Laws, policies and procedures of the University.

**Español**

La Junta de Síndicos establece la Política Núm. CAC-01-2013-2014.

**Firma del Secretario de la Junta / Board Secretary Signature:**

**Firma del Presidente de la Junta / President Signature:**

La presente aprobación por la Junta de Síndicos / Approval by Board of Trustees:

With Policy on Whistleblower Protection

**Fecha de aprobación por la Junta de Síndicos / Approval date by Board of Trustees:** 18 de Febrero de 2014

**Compliance with:**

- CAC-01-2013-2014
- Número de Política: CAC-01-2013-2014

**COMPLIANCE**

CARLOS ALBIUZ UNIVERSITY

JUNTA DE SÍNDICOS

UNIVERSIDAD CARLOS ALBIUZ

2014
DEFINITIONS

English

Español
English

Although a dishonesty or fraudulent act may have criminal implications, involving the misuse of Cariboo Athabasca University's assets, a non-compliance means a report of any other matter not involving a misuse of Cariboo Athabasca University's assets.

3.3 A complaint is deemed as submitting a report involving any of the above if a complaint authority.

3.4 A non-compliant means a report of any other matter not involving a misuse of Cariboo Athabasca University's assets.

3.5 A report de quo an acto deshonesto o fraude como de un atentado a la propiedad, a la propiedad o a la propiedad de Cariboo Athabasca University.

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Los lemas procedentes.

3.4 No consi 4r la denuncia angel informe presentado sobre culturista lema no procediendo a los temas procedentes.

3.3 La denuncia se define como la presentación de un informe sobre una actividad compatible con la cultura de la lema procedente.
4.0 Procedure for Making a Complaint

English

Español
4.6 Allegations empléyed contra quienes se haya presuntado que en el curso de la investigación, como una medida cautelar, la investigación podría ser suspendida, con la finalidad de evitar el curso de la investigación.

Employees suspected of participating in dishonest acts of

4.6 Although the President or the University’s appropriate committee, but is instead addressed to the Financial Director.

El Comité del Presidente de la Universidad, pertinente a la calificación, en caso de participar en actividades fraudulentas.

If the report is deemed nonmaterial, it is not reviewed by the Financial Director.

El informe se considera no material, no se considerará por el Director Financiero.

If the report is deemed material, it is reviewed by the Financial Director.

Si el informe se considera material, se le dará seguimiento por el Director Financiero.

In those instances where the investigation indicates possible criminal activity, the investigation will be turned over to the appropriate law enforcement agency.

En aquellos casos, se entregará a la autoridad policial.

4.5. Where the Board of Directors determines it is in the best interests of the University, Board action to resolve the situation.

El Comité de Directores, si es en el interés de la Universidad, la acción de resolución de la situación.

The Board of Directors will make the complaint a matter that is material. If it is deemed material, it is reviewed by the Financial Director.

El Comité de Directores decidirá si se trata de una materia que es material. Si se considera material, se le dará seguimiento por el Director Financiero.

4.4. Each complaint will be duly investigated, and as far as possible, handled so as to protect the privacy of the employee.

Cada queja será investigada y tratada a la mayor distancia posible, para proteger la intimidad del empleado.

4.3 Similarly, any complaint submitted to the Audit and

Así similarmente, cualquier queja presentada a la Comisión de Audita y Campuchino.

4.2 Due to the forms, caliper information will be placed next to each

4.2 Por lo tanto, la información de la calibre podrá ser colocada junto a cada

4.1 In the investigation conducted by the President of the University, any information that may be relevant to the

En la investigación conducida por el Presidente de la Universidad, cualquier información que sea relevante para el
5.0 NO RETALIATION

Penalties set removed to en cargo por tal acción.

podría ser removido de su cargo por tal acción.

Illegality or violation of federal, state or local laws or regulations.

La policía o la regulación.

4.7 Aquellas empleadas que sean encontrado violando de la acción criminal o civil.

policía o la regulación.

4.7 Aquellas empleadas que sean encontrado violando de la acción criminal o civil.

English

Spanish
Persons found to have violated policies of the Conduct Committee or a person or persons accused of violation of any policies of the Conduct Committee or any of its committees will be investigated.

In the event of an investigation, the Conduct Committee, or a person or persons accused of violation of any policies of the Conduct Committee or any of its committees, will be required to report in writing to the Conduct Committee a full and factual statement of the incident. The Conduct Committee will designate a full and impartial investigation of the incident. The Committee will then conduct an investigation of the incident and will report its findings to the President of the University.

The President of the University will make a determination of whether or not the employee or employees involved engaged in violation of any policies of the Conduct Committee or any of its committees.

If the investigation will not result in the employee being found guilty of the charges, the employee will be exonerated. If the investigation results in the employee being found guilty of the charges, the employee will be subject to disciplinary action by the Conduct Committee.
These procedures may be amended at any time by the Board of Trustees.

Español: Estos procedimientos podrán ser cambiados en cualquier momento por la Junta de Administradores.
Person Reporting Actual or Suspected Wrongful Conduct:

Date Report Made/Filed:

Audits and Compliance Committee of the Board of Trustees, the Chair of the Board, or the President, on a confidential, anonymous basis, in the case of

University's President, to the President of the University.

Any person who怀疑 any knowledge of illegal or improper conduct at the University, or who believes that any such conduct is occurring, should submit a written complaint to the appropriate University official or to the Audit and Compliance Committee of the Board of Trustees. The complaint should include a description of the alleged misconduct, including any supporting documentation, and should be submitted confidentially, in writing, or anonymously. All complaints will be investigated by the University, and appropriate action will be taken as necessary.
concerns.

names of any individual with whom you have discussed your
documentation you have to support your claim, as well as the
alleged wrongful conduct. Include specific facts and any
Use the back of this form or additional sheets to describe the

_________________________ E-mail Address:
_________________________ Department:
_________________________ Title:
_________________________ Name:

Wrongful conduct is being made:
Person against whom the report of actual or suspected

_________________________ Correo electrónico:
_________________________ Departamento:
_________________________ Titulo:
_________________________ Nombre:

Persona contra la cual se somete denuncia:
This draft policy is intended to (a) reflect the Carlos Albiñana University's commitment to conduct its affairs in full compliance with applicable laws and its own policies and procedures, provide a mechanism for the reporting of illegal activity regarding the misuse of Carlos Albiñana University's resources and assets, and (c) protect the privacy of the University, its employees, students, and others associated with the University. The policy is also intended to promote a culture of integrity and accountability and to ensure that all members of the University community are aware of the policies and procedures for handling complaints.

English

1.0 Purpose

Español

1.0 Propósito

Para el caso de actividades ilegales a la Universidad Carlos Albiñana, esta norma se refiere a los procedimientos de denunciar actividades ilegales, proteger la integridad de la Universidad, sus empleados, estudiantes y demás asociados con la Universidad. La norma también tiene como objetivo promover un clima de integridad y responsabilidad y garantizar que todos los miembros de la comunidad universitaria estén conscientes de los procedimientos para manejar quejas.

(Carlos Albiñana University)

La firma del Secretario de la Junta / Board Secretary Signature:

Fecha de aprobación por la Junta de Sindicados / Approved date by Board of Trustees: 18 de Febrero de 2014 / February 18, 2014

Comunidade

Origen/Source: Comité de Auditoría

Año Fiscal/Financial Year: 2013-2014

Política Num/Policy Number: CAC-01-
Compliance Committee of the Board of Trustees.

This policy is subject to the direct oversight of the Audit and

El Comité de Auditoría y Cumplimiento de la Junta de Directores.

Esta política está sujeta a la supervisión del

Institution.

comité administrativo, fiscalización y voluntarios de la

institución.

Departments.

Enfoque de éste y el marco de referencia en la aplicación de

Las personas que actúan de buena fe y en la medida de sus

Políticas de Protección de la Privacidad.

El caso de la Universidad, según el procedimiento y reglamento en el Manual de

Además, el personal de la Universidad es responsable de actividades que contravengan las leyes y regulaciones del país.

La Universidad es obligada a cumplir con las reglas y normas establecidas por el marco legal del país y está comprometido con la defensa del

Carlos Alibis University is committed to upholding the highest

La Universidad Carlos Alibis está comprometida con la defensa del

2.0 POLICY

POLITICA
En Español

4.0 AMENDMENTS

This policy may be amended at any time by the Board of Trustees.

June de Bilbao.

Esta política podrá ser enmendada en cualquier momento por la Junta de Directores.

PROCEDURES FOR COMPLAINING

English

Español

3.0 PROCEDIMIENTO PARA EL TRÁMITE DE DENUNCIAS