

Gettysburg College Ethics and Integrity Officer and Program Policy

Gettysburg College is committed to operating with integrity and in compliance with all applicable federal and state laws, regulations, and policies. To further these commitments, the Board of Trustees has established an Ethics and Integrity Program (the Program), which is organized as follows (*see attached organizational chart*). The Board shall provide oversight of the Program, which in most cases shall be delegated to the Board Audit (and Compliance) Committee.

The purpose of this policy is to assure that the College's Ethics and Integrity Program is effective and fully reflects the mission of the College:

1. The Program shall include the following key elements:
 - a. Designation of a high level leader, the Ethics and Integrity Officer, for day to day management of the Program;
 - b. Standards of Conduct;
 - c. Program related policies, which can be found at <http://www.gettysburg.edu/about/offices/president/executive-vice-presidentethics-and-integrity-officer/>;
 - d. Program related training;
 - e. A confidential Ethics and Integrity Hotline, which can be found at www.gettysburg.ethicspoint.com;
 - f. A process for following up and investigating alleged fraud, violation of criminal law, external compliance, or significant reputational risk, including a process for disciplining those who violate the Standards of Conduct or Program policies;
 - g. A process for identifying and evaluating key risks; and
 - h. A process for periodically assessing the effectiveness of the Program.

2. The Structure of the Program includes the following:
 - a. An Ethics and Integrity Officer who is responsible for the day-to-day management of the Program, and has a dual reporting relationship to the President and the Chair of the Audit Committee of the Board of Trustees.
 - b. A management-level committee, the Ethics and Integrity Executive Steering Committee, and the Ethics and Integrity College Committee provide advice and support to the Ethics and Integrity Officer. In most cases, the President's Council will serve as the Ethics and Integrity Executive Steering Committee. The Ethics

and Integrity Executive Steering Committee is responsible for advancing the effectiveness of the Program by providing advice and support to the Ethics and Integrity Officer in the discharge of her/his responsibilities. The Ethics and Integrity Officer chairs the College Ethics and Integrity Committee which is composed of representatives from each of the College divisions and assists with implementation of the Program.

- c. A Board-level committee, in most cases the Audit and Compliance Committee, to provide governance oversight.
 - d. Ethics and Integrity Liaisons, who work under the direction of the Ethics and Integrity Officer to ensure that their departments are in compliance with the Program.
3. The Ethics and Integrity Officer will regularly communicate information related to the Program to the President, the Audit Committee, and to the Board of Trustees.

Gettysburg College

Ethics and Integrity Organizational Chart

