



**Policy Name: Monitoring Compliance and Investigating Complaints Policy**

**Policy Number: 3103**

**I. Policy Statement**

The Monitoring Compliance and Investigating Complaints Policy provides that employees may share their questions, concerns, suggestions, or complaints with someone who can address them properly including immediate supervisor, the President, Provost, Chair of the Board of Governors, Human Resources, or anyone in management to whom the employee is comfortable approaching.

**II. Purpose of Policy**

This Policy is intended to encourage and enable employees and others to raise serious concerns within the Organization prior to seeking resolution outside the Organization.

**III. Applicability (Audience)**

This policy applies to all HUC-JIR governors, directors, officers, and employees.

**IV. Definitions**

**V. Procedures and Implementation**

Hebrew Union College – Jewish Institute of Religion (the “Organization”) requires governors, directors, officers, and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities (the “Ethics”). Governors, directors, officers, and employees must practice honesty and integrity in fulfilling responsibilities and comply with all applicable laws and regulations.

**Reporting Responsibility**

It is the responsibility of all governors, directors, officers, and employees to comply with the Ethics and to report violations or suspected violations in accordance with this Policy on Monitoring Compliance and Investigating Complaints (“Policy”).

Most Recent Revision Effective Date: 6.2022  
Initial Adoption Date: 6.2020  
Previous Revision Dates: 5.2022



## No Retaliation

No governor, director, officer, or employee who in good faith reports a violation of the Ethics shall suffer harassment, retaliation, or adverse employment consequences. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

## Reporting Violations

Violations can be reported anonymously at [HR@huc.edu](mailto:HR@huc.edu) or by calling 513-487-3201. The Ethics encourages the Organization's open door policy and suggests that employees share their questions, concerns, suggestions, or complaints with someone who can address them properly. In most cases, an employee's supervisor is in the best position to address an area of concern. However, if an employee is not comfortable speaking with a supervisor or is not satisfied with a supervisor's response, the employee is encouraged to speak with the President, Provost, Chair of the Board of Governors, Human Resources, or anyone in management to whom the employee is comfortable approaching. Supervisors and managers are required to report suspected violations of the Ethics to the Organization's Compliance Officer, who has specific responsibility to investigate all reported violations. For suspected fraud, or when an employee is not satisfied or uncomfortable with following the Organization's open door policy, individuals should contact the Organization's Compliance Officer directly.

## Compliance Officer

The Organization's Compliance Officer is the Chief Financial Officer (CFO). The CFO is responsible for investigating and resolving all reported complaints and allegations concerning violations of the Ethics and, at the Compliance Officer's discretion, shall advise the President, and Chair of the Board of Governors, or the Board of Governors. The Compliance Officer has direct access to the Board of Governors and is required to report to the Board of Governors at least annually on compliance activity, if any.

## Accounting and Auditing Matters

The Board of Governors shall address all reported concerns or complaints regarding corporate accounting practices, internal controls, or auditing. The Compliance Officer



shall immediately notify the Board of Directors of any such complaint and work with the Board of Governors until the matter is resolved.

### Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violation of the Ethics must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Ethics. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be treated as a serious disciplinary offense.

### Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously at [HR@huc.edu](mailto:HR@huc.edu) or by calling 513- 824-3201. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

## **VI. Enforcement**

### Handling of Reported Violations

The Compliance Officer will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation.

## **VII. Policy Owner, Management and Point of Contact Information**

Chief Financial Officer (CFO).  
Global Director of Human Resources, 513-824 -3201

## **VIII. Exclusions**

None.

## **IX. Effective Date**

June 15, 2022

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## **X. Related HUC-JIR Policies and Documents**

All Other Policies.

## **XI. Notification of Policy Changes and Revision History**

The College-Institute reserves the right to change this policy at any time. This policy is posted on the HUC website, Employee Handbook and Faculty Handbook.

## **XII. Appendices, References, and Related Materials**

The Appendices provide links to external guidelines, or federal, state, or local laws or regulations relevant to the policy.

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