

SUBJECT: BREWTON-PARKER COLLEGE INSTITUTIONAL INTEGRITY PLAN

Brewton-Parker College by establishing this Institutional Integrity Plan intends to demonstrate that it will deal fairly and honestly with the United States Government as well as the College's employees, students, vendors, constituents and the community in which it is located. BPC has been, and continues to be, committed to conducting its business in full compliance with all applicable laws and regulations. This compliance is essential to the advancement of our mission, vision, and values. BPC requires that any and all issues involving non-compliance with the Standards of Conduct and applicable laws and regulations to be raised and promptly resolved. This Plan as described herein and as practiced by BPC enforces this policy. The Plan focuses on the prevention and detection of violations of applicable laws and regulations, as well as fostering a business culture founded on ethical principles.

The Plan is intended as a guide for each trustee, employee, faculty and student so that BPC may fulfill its obligation to observe the laws and public policies affecting business and to deal fairly with those we serve.

BPC is committed to ensuring that the Plan is fully implemented.

The Plan will be maintained to ensure, to the extent possible, that BPC and each of its trustees, directors, officers, employees and contractors maintain the business integrity required of any institution of higher education accredited by regional associations and dispensing federal and state funds.

COMPLIANCE OFFICER

The President will appoint a Compliance Officer. The Plan is maintained under the authority of the BPC Board of Trustees with daily oversight and authority delegated through the President to the Compliance Officer. The Plan focuses on the prevention and detection of violations of applicable laws and regulations, as well as fostering a business culture founded on ethical principles.

The Compliance Officer is accessible to every member of the Brewton-Parker College community to receive any complaint regarding the ethical conduct of institutional employees and its representatives. After being informed of any allegation, the Compliance Officer will judge the complaint according to two criteria:

- (1) Violation of federal or state law or institutional policy; or
- (2) Ethical fairness as understood within a community of Christians. If the Compliance Officer judges the complaint to be insubstantial, he/she shall notify the complainant and the President of his/her determination. If the Compliance Officer judges the complaint to be substantive, the following procedure will be used:

- ◆ The Compliance Officer will address the complaint at the time it is made:
 - (1) He/ she will send a letter acknowledging receipt of the complaint;
 - (2) He/she will notify the President that a complaint has been received.
- ◆ The Compliance Officer will investigate the complaint. Letters of authority may be needed, and will be issued by the President upon request of the Officer.
- ◆ The Compliance Officer will submit a written report to the President.
- ◆ The Compliance Officer will answer questions or concerns of the President or pertinent divisional Vice President.
- ◆ The President will make a decision regarding the complaint.
- ◆ The decision and any supporting analysis will be conveyed by the President to the Compliance Officer and to the individual making a complaint.

- ◆ In cases of complaints against the executive office, the Compliance Officer will follow the same process through the Provost, with a decision to be made by the Chair of the Board of Trustees.

Reports on compliance issues will be made to the President and the Vice President responsible for the division to which the claim is aimed on an as needed basis. Records of activity of the Compliance Officer will be maintained in a secure location in the President's Office. It is the responsibility of the Compliance Officer to provide the President with the records to be stored. The Compliance Officer will file a monthly report with the President.

The Compliance Officer will strive to ensure that all claims received are fairly, completely and promptly reported.

The current Compliance Officer is Professor Forrest Rich whose office is located in the Morgan-Moses Math/Science Center. His telephone # is 583-3146.

BPC agrees to maintain the Plan involving all trustees, officers, employees, faculty, students and contractors.

The Compliance Officer has responsibility for oversight of the Plan. Each employee, faculty member, and student has responsibility for ensuring compliance with the Standards of Conduct and compliance with applicable laws and regulations.

CONFIDENTIAL REPORTING

Persons who suspect non-compliance should report it to the Compliance Officer. All such reports are confidential in nature.

Contact for Interpretation: President

This policy statement supersedes all previous
policy statements on this subject.