

General Policies and Procedures

Safety, Security, and Health

Mount Mary College has established a set of security procedures, to cover daily and unusual circumstances (see Appendix for copies of these procedures). It is the responsibility of the Public Safety officers to see that these procedures are followed. Public Safety officers have the authority to protect the Mount Mary Community and enforce campus regulations within their jurisdiction. In the process all rights of individuals will be upheld.

Some general reminders to ensure safety: please lock areas that do not need to be accessible; please be alert to strangers. If you think someone is on the premises that should not be, please ask what his or her business is. If the person has no reason for being here, please ask the person to leave. If the person refuses, we have the right to call the police because this is private property.

CONTACTING THE PUBLIC SAFETY DEPARTMENT

If you need to contact a Public Safety officer and you are on campus, go to any push-button campus phone and press “421” to connect with an on duty Public Safety officer. You may also dial ext. 345, which is a direct line to the College Operator.

If you are off campus or using a cell phone, dial 414-807-9560 to speak with a Public Safety officer on duty.

EMERGENCY MEASURES FOR A BOMB THREAT

If the College receives a threat that a bomb has been planted in a building on campus, the switchboard operator will contact Public Safety. The Director of Buildings and Grounds will coordinate the evacuation. In the event the Director of Buildings and Grounds is not on campus, the Director of Public Safety will coordinate the evacuation. The President will be informed. Evacuation will be automatic.

In evacuating, personnel should check to see that nothing unusual or out-of-place is in their workspace. 911 will be called. Any further search will be done by Public Safety in consultation with the authorities. The door to the room should be closed as the last person evacuates.

EVACUATION PROCEDURES (BOMB THREAT OR FIRE)

In the event of an emergency that requires an evacuation of Mount Mary College buildings, the following evacuation procedures will be followed:

1. All buildings evacuation will occur when the fire alarm sounds or upon notification by the President of College or a representative appointed by the President.

2. When the fire alarm is activated during an emergency, leave by the nearest marked exit and alert others to do the same. CAUTION: THE FIRE ALARM RINGS IN EVERY BUILDING SEPARATELY.
3. No one should use elevators in the event of fire.
4. Once outside, evacuees should proceed to a clear area that is at least 500 feet away from the affected buildings, keeping streets, fire lanes, hydrant areas, and walkways clear for emergency vehicles and personnel.
5. No one should return to an evacuated building unless told to do so by a College official.

EVACUATION PROCEDURES FOR PERSONS WITH DISABILITIES

The Registrar's Office, the Vice President for Academic and Student Affairs Office, and the Human Resources Office will, at the beginning of each academic term, update a general list of those individuals requiring assistance during evacuation. This list will be provided to Public Safety in order to carry out an evacuation of the building if that is ever necessary.

In the classroom: In the event that an evacuation is necessary, faculty members (this includes Ewens Spirituality Center) who have a disabled student in their classroom, should remain in the classroom with the disabled student, with the door shut, once all the other students from that classroom have left. The fire department and/or Mount Mary Security will come to evacuate faculty and the disabled students. EXCEPTION: IN THE CASE THAT IT WOULD PRESENT AN IMMEDIATE DANGER TO REMAIN IN THE CLASSROOM, THE TEACHER, WITH ASSISTANCE FROM OTHER STUDENTS, SHOULD MOVE THE DISABLED STUDENT TO A SAFE AREA FIRST AND THEN AS THE OTHER STUDENTS LEAVE TO EVACUATE, REMAIN WITH THE DISABLED STUDENT (in this event, the teacher should tell someone who is evacuating to notify Public Safety or the fire department of their whereabouts). The fire department and/or Mount Mary Public Safety will come to assist in evacuation.

In the office: In the event that an evacuation is necessary, Supervisors who have a disabled employee in their department should remain in the office with the disabled employee, with the door shut, once all other employees from that department have left. The fire department and/or Mount Mary Public Safety will come to evacuate the supervisor and the disabled employee. EXCEPTION: IN THE CASE THAT IT WOULD PRESENT AN IMMEDIATE DANGER TO REMAIN IN THE OFFICE, THE SUPERVISOR, WITH ASSISTANCE FROM OTHER EMPLOYEES, SHOULD MOVE THE DISABLED EMPLOYEE TO A SAFE AREA FIRST AND THEN AS THE OTHER EMPLOYEES LEAVE TO EVACUATE, REMAIN WITH THE DISABLED EMPLOYEE (in this event, the supervisor should tell someone who is evacuating to notify Public Safety or the fire department of their whereabouts). The fire department and/or Mount Mary Public Safety will come to assist in evacuation.

FIRE DRILL REGULATIONS

The purpose of the fire drill is to give practice in quick and orderly evacuation of all occupants of the building to a point of safety. A fire drill will be conducted at least once each year. A monthly drill is required by state law childcare centers.

Faculty members are responsible for moving their classes out of the building at the sound of the fire horn. All persons are to leave the building at once. Elevators are not to be used during the drill. *Everyone may return to the building after the return signal is given.*

FIREARMS / WEAPONS

Firearms and other dangerous weapons are not permitted on campus; nor is there an authorized storage space for them. They are not allowed in College administrative buildings, academic buildings, residence halls, or on any other College owned property.

INCLEMENT WEATHER/EMERGENCY CONDITIONS PROCEDURE

Overview

Mount Mary University realizes that inclement weather or emergency conditions may prevent employees from reporting to work. It is the policy of Mount Mary University to compensate employees under certain circumstances for temporary closing of all or some departments due to inclement weather or emergencies. Situations that may cause temporary closing include inclement weather, or emergency conditions such as fires, power failure, civil community emergencies, natural disasters, etc.

Scope

This document applies to the Mount Mary University faculty, staff and administrators responsible for its implementation.

Eligibility

All Mount Mary University employees are included within the scope of this procedure.

University Remains Open During Emergency Conditions

Employees are expected to report to work if reasonably possible. If weather or emergency conditions prevent employees from reporting to work on time, they are responsible for notifying their supervisor, within the first hour of the workday. All employees are urged to use their own discretion in deciding whether they can commute safely to work.

Administrator salaried exempt employees who are unable to work during inclement weather or other emergency period should use available vacation time as paid time off. If the employee does not have vacation time available, the employee will continue to be paid their regular salary during emergency period.

Staff non-exempt employees who are unable to report to work have the following options:

- Use available vacation time or personal time if employee wishes to be paid for hours of missed work. If employee does not have vacation time or personal time available, he or she will not be paid.
- Take time off without pay.
- Make up missed hours of work during the same work week.

University Closes During Emergency Conditions

When emergency conditions result in the closing of Mount Mary University, Administration will communicate the emergency closing in the following manner:

- Post message on My Mount Mary.
- Send communication through the RAVE Emergency Alert System.
- Notify the following local radio and television stations:

LOCAL RADIO STATIONS	LOCAL TELEVISION STATIONS
WTMJ 620 AM	Channel 4 www.todaystmj4.com
WISN 1130 AM	Channel 6 myfoxmilwaukee.com
WKTJ 94.5 FM	Channel 12 www.wisn.com
WKLH 96.5 FM	Channel 58 www.cbs58.com
WMIL 106 FM	

Since it is possible that the University would be closed for students, but staff and administration would be expected to report to work, it is important to pay attention to the details of any announcement. If the University would be closed for students only, the announcement would state the following, “Mount Mary University is closed for students. Administration and staff should report to work.”

When a partial or full-day closing is authorized by Administration, the following pay and vacation practices apply:

- Administrator salaried exempt employees will continue to be paid their regular salary during the university closing.
- Staff non-exempt employees will be compensated at their regular rate of pay, for the hours they were scheduled to work, not to exceed maximum scheduled hours.
- All employees already using a full or partial sick day, personal day or vacation day during emergency closings will not be charged with the full or partial sick, personal or vacation day.
- Depending on the circumstances, some positions (e.g., switchboard operator, public safety officer, maintenance staff, and facility engineer) may be identified as essential to report to work during a partial or full-day closing. If/when required to report to work by the employee’s supervisor, a non-exempt employee will be paid at a rate of one and one-half their regular hourly rate of pay for the hours worked.

Mount Mary University does not want to have employees incur a negative financial impact; the above measures will remain in effect for up to one week following a temporary closing. Any on-

going closing after one week will be evaluated for its unique nature, and decisions by the President of the University will be rendered concerning continued payment.

Should an emergency condition require the movement of work from the regular place of business to a predetermined location, employees are expected to report to work if at all possible. Otherwise, the guidelines under the Facility Remains Open During Emergency Conditions Section will apply.

TORNADOES

Violent thunderstorms and tornadoes are a part of Milwaukee's weather pattern. It is possible that the tornado siren would be sounded during school hours. It is important that all persons in any building seek shelter immediately in the lower corridors of the building, away from windows and objects that could cause injury. All should remain in the lower areas until the storm has passed and until the "all clear" signal is given.

EMERGENCY SITUATIONS, ACCIDENTS OR HEALTH PROBLEMS REQUIRING AID

When a health emergency occurs, and the person affected asks for an ambulance or paramedic, please call 911 immediately. Direct the requested assistance to the correct area of the College (correct entrance; either 92nd street or the Menomonee River Parkway entrance).

After calling 911, please call Public Safety at ext 421, or 414-807-9560. Public Safety officers will respond to the emergency and provide aid until the emergency vehicle arrives.

PROCEDURES FOR SCHOOL RESPONSE AFTER STUDENT SUICIDE OR SUDDEN DEATH

The Vice President for Academic and Student Affairs is the central figure on campus during crises that result from the suicide or sudden death of a Mount Mary College student. She directs the crisis effort and makes final decisions in all administrative matters. She also protects the surviving students from threats to their own physical and emotional well being. Specifically, the Vice President for Academic and Student Affairs is charged with the following tasks, some of which may be delegated.

I. Emergency Measures

A. If the suicide or sudden death of a student occurs while the person is on campus:

1. The Vice President for Academic and Student Affairs immediately notifies the family of what has happened.
2. The police are summoned to help at the site of the death or accident.
3. Emergency services are called.
4. Persons who are at the scene when death is discovered or who witness the event are escorted to a quiet room where they can be comforted and supported by school officials and peers.

5. General announcement of the death is made only after the family has been notified in an appropriate manner.

- B. If the suicide or sudden death of a student occurs while the person is *not* on campus, the Vice President for Academic and Student Affairs verifies the death and obtains information about the circumstances of the death from a reliable source:
- a. If the message informing the College of the student's death has come from someone outside the student's family or home, the student's home is called for verification of the death and more information.
 - b. If the message informing the College of the student's death has purportedly come from the family or someone in the student's home, the student's home is called back to verify the source of the information and obtain any additional information needed.
 - c. The police department or medical examiner's office may be of help in certain instances.

II. Announcement of the Death. The Vice President for Academic and Student Affairs informs the President of the College of the death, and the President makes the appropriate official announcement. The Director of Public Relations is also notified.

III. Assessment of the impact of the death on the Mount Mary College community. With the assistance of the Crisis Intervention Team, the Vice President for Academic and Student Affairs makes a determination of the impact of the following factors upon the College community in order to predict the intensity and amount of help that may be needed.

- A. The timing of the death. In general, death that occurs at a time when school is in session has a greater impact on the student body than death that occurs during the summer, spring or winter vacation.
- B. The circumstances of the death. How and where the death occurs may be important.

IV. Crisis Intervention Team Response.

- A. The Crisis Intervention Team is solely concerned with providing immediate support and counseling services to "high risk" students or faculty and to make sure that the persons have adequate support at the time either from the school or community resources.
- B. The Crisis Intervention Team also provides crisis counseling for any staff members who desire it in order to assist them in working through their own grief.
- C. The Crisis Intervention Team members consult with the Vice President for Academic and Student Affairs periodically throughout this crisis period and assess the impact of student reactions in order to adjust the size of the Team if necessary.
- D. The Vice President for Academic and Student Affairs documents the activities of the Crisis Intervention Team and the entire incident.

V. Faculty Response to the Death.

- A. Teachers are encouraged to handle expressions of grief or loss in their classes to the extent that they are comfortable in doing so.
- B. Teachers should announce the availability of counseling and the locations of the Crisis Intervention Team members.

CAMPUS OR CLASSROOM DEMONSTRATIONS

1. As soon as any faculty or staff member (administrative or secretarial) becomes aware of the presence of unauthorized persons, or of a disruption or demonstration anywhere on campus, such persons should contact the Public Safety Department and the following administrators in the order listed. If the administrator is not on campus or is otherwise unavailable, the next in line should be contacted.

Vice President for Academic and Student Affairs
Senior Vice President for Administration and Chief Financial Officer
Associate Dean for Student Affairs

2. The President is notified immediately but does not become involved initially.
3. If demonstrators appear in the classroom and the instructor has concluded that the class or activity has been materially disrupted, the instructor should, in a non-threatening manner, say, "You are disrupting my class and the regular procedure of this college. If you are students at this college, you will be liable to disciplinary action; if you are not, then you are trespassing and you may be liable to *civil sanction*. Will you please leave our classroom."
4. If the instructor wishes, the class may be asked whether to allow the persons causing the disruption to talk for a specified time.
5. Dismissal of the class should be avoided, since it is the responsibility of the instructors to hold classes at scheduled times, and it is the students' right to obtain the instruction.
6. Instructors should remain calm and use good judgment to avoid causing harm to anyone.

CAMPUS PARKING/TRAFFIC RULES

In accordance with Mount Mary College regulations, Public Safety officers will patrol and enforce parking procedures. The ensuing parking regulations give definitive information on parking at Mount Mary College.

Every car parked on Mount Mary College property must have a properly displayed Parking Permit. [**Exception:** Delivery or Drop Off: Maximum Time 20 Minutes.]

Every regular car user of the Mount Mary College parking lot facilities must be registered and display a current permit. All permits must be hung from the inside rear view mirror.

Public Safety Officers will implement the following Mount Mary Parking/Traffic Rules. Violators will be ticketed, violations will be recorded, and fines will be imposed. Fines must be paid in person at the Business Office, or by mail addressed to the Public Safety Department c/o Mount Mary College. The College is not responsible for loss or damage to personal property of students, faculty or staff, whether such damage is caused by theft, fire, water or other calamities.

Citations are issued to students, staff and faculty for the following offenses with a fine amount of \$15.00 per citation.

- Parking in fire lanes*
- Parking a car not certified for handicapped driver in a "handicapped space" *
- Parking outside a lined space
- Parking in a non-student lot without Faculty/Staff permit
- Unauthorized parking
- Parked in a visitor space
- Parked without a current permit

*Because they are illegal, these parking offenses are subject to Milwaukee Police Citations in addition to the Mount Mary ticket.

SPECIFIC USERS OF PARKING FACILITIES

Resident and commuter students:	<i>Resident and commuter students</i> entering from 92nd Street use lined driveway spaces and Lot B (Southeast Lot). Commuters entering from Menomonee River Parkway use lined driveway spaces and Lot C (Theater Lot) until filled.
Evening students:	P.M. Students may use all Lots between 5:00 p.m. and 10:30 p.m.
Faculty/staff:	The Northeast Lot (Lot A) is reserved for Faculty and Staff during the day. The Lot south of Haggerty Library is reserved for Food Service Staff and Personnel with offices in the Haggerty Library building.
Handicapped users:	For parking in a space reserved for the handicapped, a state-issued Disabled car license plate, or a Certified Temporary Permit, must be displayed on rear window of driver's side. (Violators are subject to Milwaukee Police citations.)
Visitors (Admissions/sales/etc.):	Reserved for visitors; one-hour parking limit. Should more time be needed, MMC Staff Member should inform Public Safety.

Guests of Faculty/ Staff: Administrators, faculty and /or staff expecting guests should notify Public Safety prior to the guest's arrival with the guest's vehicle information for assistance with the guests parking.

The only cars that may be parked in lot A, Monday through Friday before 5:00 P.M. are registered cars of faculty or staff.

ACCESS TO RESIDENCE HALLS

After hours admittance by residents is done through the main archway entrance of Caroline Hall. All other doors are to remain locked. School I.D. must be shown as identification. A Public Safety Officer is stationed at that entrance from 11:00PM p.m. to 7:00 a.m.

WRITING OF REPORTS

Reports are kept of all incidents that happen on Mount Mary property and are kept on file in the Public Safety Office. Depending on the severity of an incident, a report may be filed with local authorities. Mount Mary College Public Safety reports are confidential.

SAFETY ESCORT

Upon request, a Public Safety officer will be dispatched to your location and will escort you safely to your car. To initiate this service call extension 421, or press "0" for the College Switchboard Operator, ask for an escort, and give your location.

Reporting of Injuries

All accidents, injuries and illnesses occurring on work premises or while performing required work off campus, should be reported before the end of the workday to a Public Safety Officer on duty and your supervisor. Anyone who has been exposed to blood may be referred to the department of Human Resources for information on Blood Borne Pathogens.

Anyone who has experienced an injury/illness or blood exposure should know that he or she has a responsibility to give a report, as a positive step, rather than an inconvenience. Anyone who witnesses an injury or blood exposure of a student or visitor should take the responsibility for assisting that person in giving a report as outlined in the first paragraph.

Statement on "AIDS"

When Mount Mary College becomes knowledgeable that an employee is HIV positive or has Acquired Immune Deficiency Syndrome (AIDS), the College will maintain the strictest confidence regarding this health matter. Mount Mary complies with all State and Federal laws governing employer's consideration of employees with AIDS.

Smoke-Free Workplace

In an effort to promote a healthy environment for everyone, which is consistent with Mount Mary College's Mission statement, all buildings on campus are smoke-free. Smoking is not permitted less than 45 feet away from any building, with the exception of certain designated areas. Those areas are: the concrete aprons on either side of the front doors of Haggerty Library; the concrete table and benches outside the southeast door of Notre Dame Hall; the sidewalk leading to the woods at the northeast door of Notre Dame Hall; the west exit of Kostka Hall at the parking lot; and the linden arches of Bergstrom Hall, east of the exit at the Post Office. These areas are provided with receptacles for smoking materials. Violation of this policy may lead to disciplinary action; students may be fined \$50.00 for violating this policy.

Drug-Free Workplace Policy Statement

According to The Drug-Free Workplace Act of 1988, Mount Mary College hereby notifies its employees that the unlawful manufacture, distribution, dispensation, possession or use of controlled substances is prohibited in or on Mount Mary College owned or controlled property. A violation of this policy by a Mount Mary College employee will be reason for mandatory evaluation/treatment for the substance use disorder and/or for disciplinary action up to and including the termination of employment and any criminal sanctions provided by federal, state, and local law. Mount Mary College will make a good faith effort to ensure a drug-free workplace.

IMPLEMENTATION PROCEDURE: DRUG-FREE WORKPLACE POLICY

1. The Human Resources office will provide drug abuse awareness information to all employees. This will include an annually updated list of available drug abuse assistance or rehabilitation programs approved by federal, state, or local health, law enforcement, or other appropriate agencies.
2. If any employee is convicted of any criminal drug statute violation that occurred in the workplace, that employee must inform the President's office of the conviction within 5 days under penalty of immediate dismissal. The College will then take the following actions:
 - a. In the case of a first conviction, the College reserves the right to suspend or dismiss any employee whose conviction could, in the judgment of the President, cause disruption to the College's operation.
 - b. Ordinarily in the case of a first conviction, the offender will be required in writing by the President's office to have a medical evaluation of the drug-related condition. If a drug

abuse problem is diagnosed, the employee will be given the choice of participating in an approved treatment program, in a non-pay status and at his or her own expense, or of being dismissed.

- c. In the case of a second conviction, the offender's employment will be terminated.
- 3. The College will require a written acknowledgement from any employee working on a Federally-funded program that the employee understands and agrees to abide by the Drug-Free Workplace Policy of the College.

Sexual Assault

Sexual assault perpetrated on any individual at Mount Mary College will not be tolerated and will be met with disciplinary action up to and including immediate employment termination and student dismissal. Discipline may be imposed upon a finding of a probable violation of College rules. If necessary, measures will be taken to separate the alleged assailant from the victim.

Students who are assaulted are urged to promptly report the crime both to the police and either the Associate Dean for Student Affairs, the Coordinator of Residence Life and Student Engagement, or Mount Mary Public Safety. This action does not obligate prosecution, but it does make legal action possible if the decision to prosecute is made later. The earlier an incident is reported, the easier it is to collect valuable evidence.

The Associate Dean for Student Affairs, the Coordinator of Resident Life and Student Engagement, the Director of Public Safety, or the Counseling Center will discuss with the victim the range of resources and alternatives available to her/him. Referrals regarding who should be contacted with requests for changes in academic, living, or work situations by those who have been a victim of a sexual assault can be provided.

Mount Mary College Public Safety offers educational information on prevention of date rape, crime prevention, and personal safety.

Whistleblower Policy

1.1 General. Mount Mary College (the “College”) is committed to lawful and ethical behavior in all of its activities and requires directors, officers, employees and committee members to conduct themselves in a manner that complies with all policies of the college, and applicable laws and regulations. As representatives of the College, directors, officers, employees and committee members shall practice honesty and integrity in fulfilling their responsibilities. To help ensure lawful and ethical behavior, honesty and integrity, the College established this Whistleblower Policy, which is intended to encourage and empower directors, officers, employees and committee members to report violations or suspected violations within the College prior to seeking assistance outside the College.

2.1 Reporting Responsibility. Each director, officer, employee and committee member shall report any violation or suspected violation of the policies of the College, and applicable laws and regulations in accordance with this Whistleblower Policy. For example, the types of concerns that shall be reports include but are not limited to:

- (a) Reporting of false or misleading information on the College's financial statements, grant reports, tax returns or public documents;
- (b) Reporting of false or misleading information to, or withholding material information from, the College's auditors, accountants, lawyers, directors, officers, managers or other persons who are responsible for ensuring the College's compliance with its policies or applicable laws or regulations;
- (c) Self-dealing, embezzlement, private benefit, private inurement or misappropriation of funds;
- (d) Violations of the college's governing documents and policies, including, but not limited to, Articles of Incorporation, Bylaws, Conflicts of Interest Policy, Whistleblower Policy, Document Retention Policy, or confidentiality rules;
- (e) Discrimination in admissions or participation in any program or activity on the basis of a person's sex, race, religion, national origin or ancestry, pregnancy, marital or parental status, sexual orientation or physical, mental, emotional or learning disability;
- (f) Discrimination against any qualified employee or qualified applicant for employment on the basis of sex, race, religion, national origin or ancestry, age, disability, veteran status, lawful source of income, marital status, or sexual orientation;
- (g) Violation of any federal, state or local laws or regulations, including, but not limited to, the rules applicable to organizations exempt from federal income taxation under Section 501(c)(3) of the Internal Revenue Code of 1986, as amended; and/or
- (h) Concealing violation or suspected violation of any of the foregoing.

3.1 No Retaliation. A director, officer, employee or committee member who in good faith reports a violation or suspected violation pursuant to this Whistleblower Policy shall not be subject to termination, removal, threats, harassment, discrimination or retaliation as a result of one's actions as a whistleblower. Any person who believes he/she is being retaliated against for making a report under this policy must report the retaliatory conduct immediately under the procedures set forth in Section 4.1 below. A director, officer, employee or committee member who threatens, harasses, or discriminates or retaliates against someone who has reported a violation or suspected violation in good faith shall be subject to discipline including, but not limited to, termination of employment, removal from position, civil lawsuits and/or criminal prosecution.

4.1 Reporting.

(a) Employees. If at any time, an employee becomes aware of a violation or a suspected violation, then he or she shall report the concern to his or her supervisor or to the next level of administration as needed until the concern is satisfactorily resolved. However, if for any reason, the employee is not comfortable reporting the concern to his or her supervisor, or he or she does not believe the concern is being satisfactorily resolved by the supervisor, then he or she may report the concern to the President of the College, Chairman of the Board of Regents, or the College's legal counsel.

(b) Directors, Officers and Committee Members. If at any time, a director, officer or committee member becomes aware of a violation or suspected violation, then he or she shall report the concern directly to the Chairman of the Board of Regents, President, or the College's legal counsel.

(c) Manner of Reporting. Wherever possible and practical, such concerns should be reported in writing. Concerns also may be reported anonymously. However, because it is impossible to seek additional information from someone who has anonymously reported a concern, such reports should contain as much specific information as possible.

(d) Confidentiality. Reports of violations or suspected violations shall be kept confidential, to the extent possible and consistent with the need to investigate, prevent or correct the violation. Unnecessary disclosure of information relating to an investigation under this Whistleblower Policy will be viewed as a serious offense and may result in discipline including, but not limited to, termination of employment, removal from position, civil lawsuits and/or criminal prosecution.

(e) Good Faith. Any person who reports a violation or suspected violation shall act in good faith and have a reasonable basis for believing the matter raised is a serious violation. The act of making unsubstantiated allegations that prove to have been made maliciously, recklessly, with gross negligence or with the knowledge that such allegations were false shall be viewed as a serious offense and may result in discipline including, but not limited to, termination of employment, removal from position, civil lawsuits and/or criminal prosecution.

5.1 Handling of Reported Violations. All reported violations or suspected violations filed in accordance with this Whistleblower Policy shall be promptly investigated by the individual receiving the report and, where warranted upon the completion of the investigation, appropriate corrective action shall be taken.

The Family Educational Rights and Privacy Act (FERPA)

The College is in compliance with the Family Educational Rights and Privacy Act of 1974. The Family Educational Rights and Privacy Act (FERPA) affords students certain rights with respect to their education records. For more details about these rights, refer to the full Annual Notification to Students available at <http://www.mtmary.edu/pdfs/resources/ughandbook.pdf>.

Rules/Regulations for Implementation of Rehabilitation Act of 1973 Section 504

The College Policy on Individuals with Disabilities:

Mount Mary College is committed to providing equal access to academically qualified students with disabilities. A part-time Coordinator of Disability Services addresses the needs of otherwise qualified students with recognized physical, learning, sensory or psychological disabilities affecting a major life activity (e.g. walking, communicating, seeing, learning, etc.). Students with disabilities have access to tools and resources that provide them with an opportunity to

demonstrate mastery of course content. Mount Mary College does not however, offer a specialized curriculum for persons with disabilities nor specialized disability advisors. Requested accommodations must be reasonable and students should not assume that accommodations provided in high school will be provided at Mount Mary College. Available services will vary depending on the nature of the disability.

Equal Opportunity Policy

I. MOUNT MARY COLLEGE'S EQUAL EMPLOYMENT OPPORTUNITY POLICY

GOAL: Consistent with the tradition of the School Sisters of Notre Dame whose mission includes providing for the needs of women in a changing and diverse society, it is the sincere desire of Mount Mary College to employ qualified faculty and academic staff that reflect human diversity. It is especially the desire of the College that the faculty and staff composition reflects the diverse racial and ethnic composition of the surrounding community and of the college student body.

A. Statement of Policy

Mount Mary College is an Equal Opportunity Employer dedicated to a policy of non-discrimination in employment on any basis including race, color, religion, age, handicap, national origin, sex or any other basis protected by local, state or federal law. Mount Mary College encourages members of ethnic minorities, women, Vietnam era or disabled veterans, persons with disabilities, and persons between the ages of forty and seventy to apply.

Mount Mary College, founded and operated by the School Sisters of Notre Dame, reserves the right to maintain its heritage and destiny as a Christian and Catholic witness in higher education.

As a religious educational institution, Mount Mary College takes the prerogative to grant preference in its employment practices to qualified School Sisters of Notre Dame to perform any work connected with the carrying on by Mount Mary College of its activities.

B. Dissemination of Policy

Mount Mary College's policy of equal employment opportunity shall be disseminated both internally and externally by the college publications, notices, meetings, and through employment recruiting sources, letters and communications used in soliciting prospective employees.

C. Responsibility for Administration and Implementation

The President shall be responsible for the overall College coordination, implementation and improvement of the equal employment opportunity program. The Human Resources

Director, as Affirmative Action Officer, Department Chairpersons and others participating in the hiring shall assist the President in this administrative responsibility.

II. EQUAL OPPORTUNITY PROGRAM RECRUITMENT POLICY AND PROCEDURES

A. Background

Mount Mary is a Christian and Catholic institution of higher education. It is governed as an independent corporate entity of the State of Wisconsin, conducted under the auspices of and consonant with the educational principles of the School Sisters of Notre Dame.

B. Current Structure and Recruitment

The current structural organization of the College is published in Chapter II of this handbook.

The College's policy of equal employment opportunity shall be implemented within the framework of administrative delegations.

C. School Sisters of Notre Dame

As a religious educational institution, Mount Mary College takes the prerogative to grant preference in its employment practices to qualified School Sisters of Notre Dame to perform any work connected with the carrying on by Mount Mary College of its activities.

To preserve the existing relationship between the College and the School Sisters of Notre Dame in its academic and administrative work, recruiting efforts shall include notifying the Provincial of the School Sisters of Notre Dame of vacancies as they occur.

D. Procedure for Recruitment of Full-Time Faculty

Recruitment for full-time faculty shall include notice of vacancy to be sent to the Provincial of the School Sisters of Notre Dame, as well as advertisements in appropriate professional and academic journals and employment registries. Advertisements and position announcements include wording that encourages minority and women applicants to apply.

The College reserves the right to conduct an internal search when a vacancy occurs, although an external search may also be conducted. When a position is vacated or becomes available, it will be announced through postings for five working days on the following bulletin boards: outside the Human Resources office, and inside the Mailroom. The notices shall summarize the function and responsibilities of the position for internal application.

E. Procedure for Recruitment of Part-Time Faculty

Recruitment of part-time faculty will follow the same procedures as outlined for full-time faculty to the degree that the situation requires.

F. Affirmative Action Officer

The Director of Human Resources serves as the Affirmative Action Officer of the College. The Affirmative Action Officer is responsible for monitoring the recruitment practices of the College and for creating and maintaining affirmative action awareness among those persons responsible for recruitment and employment of faculty and administrative personnel. The Director of Human Resources is also responsible for answering requests for reports concerning employment practices. Therefore, any requests for such information or reports should be directed to that office.

This affirmative action responsibility relates solely to our commitment to voluntarily place minority and other under-represented groups in employment situations when possible and is not intended to create any private rights of action or to satisfy federal requirements.

III. Compensation

Mount Mary College, as an Equal Opportunity Institution, follows the principle that compensation for employment by the College is accorded to each person on the basis of the nature of the job and individual qualifications and without regard to race, color, religion, age, handicap, national origin, sex or any other basis protected by local, state or federal law.

Harassment Policy

Mount Mary College seeks to foster respect for the dignity and worth of all people and therefore will not tolerate any form of harassment, discrimination or intimidation based on race, color, religion, age, handicap, national origin, sex or any other basis protected by local, state or federal law of any faculty member, administrator, support staff or student.

Unwelcome conduct, comments, touching, teasing, joking, intimidation, sexual advances, requests for sexual favors, or other verbal, visual or physical conduct of a sexual nature constitute harassment when (a) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's academic evaluation or employment; (b) submission to or rejection of such conduct by an individual is used as the basis for academic evaluation or employment decisions affecting such individual; or (c) such conduct has the purpose or effect of unreasonably interfering with an individual's work or academic performance or creating an intimidating, hostile or offensive working or academic environment. Sexual harassment may include the following: explicit sexual propositions, sexual innuendo, suggestive comments, sexually oriented kidding or teasing, practical jokes, jokes about gender-specific traits, foul or obscene language or gestures, displays of foul or obscene printed or visual material, and physical

contact such as patting, pinching, brushing up against, hugging, cornering, kissing, fondling, or any other similar contact.

We are aware that conduct, comments or behavior that might be offensive to some individuals might be considered inoffensive by others. Because of this, it is difficult to learn of and take effective action to halt harassment unless the affected individual alerts the proper officials both to the occurrence of and the fact that the conduct in question is offensive or unwanted. Everyone at Mount Mary is responsible for helping to assure that we avoid harassment.

If you are a member of faculty, administration or staff and have been informed of, or feel you have experienced or witnessed any form of harassment, you should notify your supervisor, the Vice President for Academic and Student Affairs, or the Human Resources Director, who is the College Harassment Officer. If you are a student and feel you have experience or witnessed any form of harassment, you should notify the Associate Dean of Student Affairs. Any individuals who believe that they have been subjected to harassment have the duty to promptly bring this fact to the attention of Mount Mary administration so that the problem may be confronted.

NOTE: harassment that is reported to one of the Mount Mary counselors or to the Director of Campus Ministry will not be disclosed to Mount Mary administration (Human Resources Director, Vice President for Academic and Student Affairs) without the consent of the person alleging the harassment.

Mount Mary treats all claims of harassment seriously and our policy is to investigate all such complaints promptly and thoroughly. Complaints will be treated as confidentially as possible (in light of the College's need to fully investigate the matter) to protect the complainant and to protect the reputation of any employee or student who may be wrongfully charged.

Depending on the nature of the alleged harassment, interim measures may be taken. These measures might include temporary reassignment or separating the alleged harasser and the employee or student who brought the complaint. If the investigation reveals that a Mount Mary employee or student has engaged in harassment, that employee or student will be subject to disciplinary action, up to and including immediate employment termination or student dismissal. Retaliating or discriminating against someone for complaining about harassment is prohibited. Retaliating against witnesses or other individuals who cooperate in a harassment investigation is also prohibited. If you believe you have been retaliated against, even if the retaliation is subtle, report this fact immediately to Mount Mary administration (Human Resources Director, Vice President for Academic and Student Affairs). Anyone found to have retaliated against an individual because of a harassment complaint or because of cooperation in the investigation of a complaint will be subject to disciplinary action, up to and including immediate employment termination or student dismissal.

Sexual harassment of employees is a form of sex discrimination, according to Title VII of the Civil Rights Act of 1964 (as amended) and is illegal according to the 1980 guidelines of the Equal Employment Opportunity Commission. Sexual harassment of students in an academic environment is prohibited under Title IX of the 1972 Educational Amendments.

Questions regarding this policy should be addressed directly to the Director of Human Resources, who has overall responsibility for investigating and resolving harassment complaints.

Criminal Background Check Policy

Mount Mary conducts a criminal background check on all potential new hires as part of the College's pre-employment screening process. As part of the process, a Record Check Release Form will be required to be completed by a candidate to reflect their agreement and acknowledgement of the background check.

If the criminal history provided by the applicant does not confirm the information obtained, the applicant will be given an opportunity to explain any inaccuracies. If a satisfactory explanation is not given, the applicant will not be considered further for the position.

If after employment any employee is discovered to have lied regarding his or her criminal history, that individual is subject to immediate discharge.

The College's equal opportunity policy will be followed with respect to any criminal history information. Accordingly, the following factors will be considered if an individual has a criminal history in determining whether to hire the individual:

- The nature of the criminal act
- The frequency and severity of criminal acts
- The time since the last conviction
- The time between convictions
- The nature of the job
- The qualifications of the individual for the job
- Evidence that the individual has successfully rehabilitated himself or herself

Criminal background will not be considered in isolation, but rather in conjunction with the applicant's qualifications and job requirements. All criminal history record information shall only be used in accordance with our Policy and shall be maintained in confidential files separate from personnel records.

SPECIFICS OF CRIMINAL BACKGROUND CHECK POLICY

Positions Requiring Criminal Background Check By Law

- Child Care Center Employees

METHOD OF OBTAINING RECORDS

Mount Mary will complete the Criminal Record forms of the applicable state(s) where the employee lived and/or worked.

EMPLOYMENT DATE

Applicant may not begin working for the College until a background check has been successfully completed.

Immigration Reform and Control Act of 1986

In November 1986, President Reagan signed into law the Immigration Reform and Control Act of 1986. This law resulted in the first major revision of America's immigration laws in decades. The law seeks to preserve jobs for those who are legally entitled to them: American citizens and aliens who are authorized to work in our country.

Employees hired after November 6, 1986 must fill out a short form certifying that they are who they say they are and that they are eligible to work in the United States. Certain designated staff are authorized to sign this form. Since most of our employees will be U.S. citizens, they will need to present, when they come for the final employment interview, either 1) a U.S. passport, or 2) a state issued driver's license with a photograph *and* an original Social Security Number Card or a birth certificate. Other documents are also allowed, as listed on the back of the I-9 form. All employees must fulfill this requirement within 72 hours of beginning employment.