

THE TRUSTEES OF TRINITY COLLEGE

POLICY ON COLLEGE POLICIES

Trinity College Policy No. 1.0.1

Policy Statement

The Board of Trustees is the governing authority of the College, the sole fiduciary governing board, and the only board authorized by law to act on behalf of and in the name of the College. The Board of Trustees, in its sole discretion, may delegate powers and authority to individuals and groups within the College, of its choosing, to execute the policies and actions of the Board of Trustees. The Board of Trustees may, in its sole discretion, direct, amend, and revoke any policy of the College.

The President of the College has general responsibility and supervision over all matters pertaining to the day-to-day management of the College and its activities, subject to the advice and approval, when necessary, of the Board of Trustees. Pursuant to that authority, the President approves all College policies and in the President's discretion may delegate authority to other College officers to develop policies and procedures for their areas of responsibility, consistent with State and Federal law, the College Charter, the College Statutes, the Standing Rules of the Board of Trustees, and other guidelines as may be in effect from time to time.

Reason for the Policy

This policy establishes a process for development, approval, review, promulgation, amendment, and withdrawal for all College policies. By implementing this uniform process, the College seeks to enhance and ensure operational efficiencies, best practices, effective decision-making, and compliance with laws and regulations across the College. By following the process outlined below, College policies shall become easily accessible and understandable, widely disseminated, consistent, and reviewed and approved in a transparent manner.

Definitions

College Policy

A "College Policy" is a directive that meets one or more of the following criteria:

- It has broad application throughout the College or broad constituent groups of the College community, helps achieve compliance with applicable state and federal laws and regulations, or manages institutional risk;
- It mandates actions or constraints, and contains specific procedures for compliance with the policy;
- It is required by consent decree, resolution agreement, settlement, or other external legal authority;
- It is officially sanctioned through the College Policy approval process; and

- It is presented in the format required under this policy.

Responsible Officer

A “Responsible Officer” is the Vice President or appropriate senior administrative officer with principal responsibility for the substantive area covered by a particular College Policy. This individual is the “owner” of the College Policy, with responsibility for creation, implementation, and timely updating of the College Policy.

College Policy Review Committee

The “College Policy Review Committee” shall consist of the College’s Principal Academic Officer, Principal Financial Officer, Principal Information Officer, Principal Student Success Officer and the Principal Human Resources Officer. Any member of the Committee may appoint a designee to represent that member, when the member is unavailable. The Committee is advised and staffed by the Principal Legal Officer. Other senior officers, staff and faculty may be consulted by the Committee and/or invited to join its meetings to discuss specific policy issues. The Committee is advisory to the President.

Statements of Elaboration of the Policy

A. College Procedures

College procedures are descriptions of the manner and form by which a College Policy shall be effectuated.

B. Establishing an Interim Policy

When necessary, the Committee may approve and publish a College Policy on an interim basis. This process shall be followed only in circumstances in which it is impossible or impracticable to follow all of the procedures set forth in this policy within a reasonable period of time.

Interim policies have the effect of a College Policy, but are subject to a notice and comment period during which members of the College community shall be permitted to submit comments and suggestions regarding the interim policy. The duration of a notice and comment period shall be determined at the discretion of the College Policy Review Committee. To derive the benefits of a standard policy document and the full review cycle, absent extenuating circumstances, the Responsible Officer shall complete the process outlined in this document, preferably, within one year of the promulgation of the interim policy.

C. Development of College Policies and Procedures

1. College Policies shall be:
 - a. Presented in a common format
 - b. Formally approved by the College Policy Review Committee
 - c. Maintained centrally and accessible to the Trinity community
 - d. Linked electronically to procedures for implementation of the policy

- e. Kept current within the framework outlined in this policy and as new data becomes available.
- 2. All College policies shall be presented in a format similar to the sample policy template attached hereto as Appendix A.
- 3. If a Responsible Officer determines that an existing or proposed policy may have College-wide application, that officer shall submit the policy proposal to the College Policy Review Committee for review. Upon review, the Committee shall take one of three actions:
 - a. Appoint the Responsible Officer to draft or revise the policy as a College Policy;
 - b. Authorize the formation of an ad hoc policy-drafting committee to draft or revise the policy as a College Policy; or
 - c. Determine that the proposed policy or revision does not fall under this policy and terminate the review.
- 4. Responsible Officers shall submit proposals for new or revised College Policies to the College Policy Review Committee for review and approval. In the spirit of shared governance, the Committee may determine that representatives of particular College constituencies should review the proposed policy. In such cases, the Committee shall seek the advice and counsel of the appropriate representatives, who shall provide their input in a reasonably prompt time period.
- 5. If the College Policy Review Committee approves the proposed College Policy, it shall forward the policy proposal to the President's senior leadership team, for review, and to the President for approval. The President, in consultation with the General Counsel, determines whether the proposed College Policy should be submitted to the Board of Trustees for approval. Following approval by the President and/or the Board of Trustees, as the case may be, the College Policy shall be disseminated to the College community, as specified by the Committee, in consultation with the Vice President for Communications and Marketing.
- 6. The Responsible Officer shall ensure that College policies are reviewed, updated and/or revised as needed in accordance with applicable laws and regulations, but at a minimum every three years.
- 7. The College Policy Review Committee shall be responsible for approving any changes to College Policies that are material in nature. The Responsible Officer shall submit all material changes to the Committee in the form of a revised policy, including a new impact statement. On an as-needed basis, the Responsible Officer shall request of the Committee routine changes (such as new contact names, position titles, and email or web addresses) to an existing policy document.
- 8. The Responsible Officer may grant policy exceptions for unusual circumstances that render adherence to the College Policy impossible or impracticable. The Responsible

Officer shall grant no exception that violates or is incompatible with federal, state, or local laws or regulations, including governmental rules relating to grants and contracts. In evaluating a request for an exception to a College Policy, the Responsible Officer shall apply the following guidelines:

- a. If there is any question whether the exception may implicate federal, state, or local laws or regulations, the General Counsel shall be consulted before any exception is granted.
 - b. An exception is ordinarily limited to the particular facts and circumstances giving rise to the request. Should the facts and circumstances in question involve an issue that may recur or an issue with broad application, the Responsible Officer shall petition the Committee to revise the College Policy, to avoid the need for a similar exception in the future.
9. Violations of College Policy may result in disciplinary action up to and including termination of employment or expulsion from the College, and in some cases, may subject the violator to civil or criminal action.
- a. *Whistleblower Hotline*. The College has established a third party-run ethics and compliance hotline employees can use to discretely and confidentially report conduct or activities that may be illegal or unethical, or otherwise violate College Policy. The hotline is not a substitute for established channels of responsibility, but rather an option for reporting problematic behavior when those other mechanisms are not suitable. The system is available 24 hours a day, 365 days a year and can be accessed by telephone: 866-934-4567, or on the web: <http://trincoll.silentwhistle.com>.

D. Withdrawing a Policy

In certain circumstances, a Responsible Officer may deem it appropriate to withdraw an existing College Policy or consolidate it with another College Policy. The responsible Officer shall inform the Committee and the other administrative Officers of the College of this intent and, upon approval, issue an announcement of a withdrawn policy in consultation with the Vice President of Communications and Marketing.

E. Board of Trustees Review

Annually, the College Policy Review Committee shall submit new or revised College policies to the Audit & Risk Committee, for review and comment. When a new or revised policy is expected to have a material effect on the governance or operations of the College, the College Policy Review Committee shall submit such policy to the committee of the Board of Trustees with relevant oversight responsibility, for review and comment.

Key Office to Contact Regarding this Policy and its Implementation

The Responsible Officer for this policy is the President of the College.

The General Counsel of Trinity College is responsible for the oversight and implementation of this policy.

Questions relating to the implementation of this policy should be directed to the General Counsel, or the appropriate senior administrative officer with responsibility for the subject matter.

Date of Initial Policy: April 2, 2025

Date of Last Revision: April 2, 2025

Appendix A

Trinity College Policy Template

The following template shall be used for College policies:

Trinity College Policy No. _____

TITLE OF POLICY

Policy Statement [General Statement of Policy, including whom it covers (all employees, faculty, staff, students, others)]

Reason for the Policy

Definitions [Defined terms in the policy, if applicable]

Statements of Elaboration of Policy, if any [Insert subsections with headings and details concerning the policy, including specific issues or situations, responsibilities and mechanisms for compliance]

Cross References to Related Policies

Responsible Officer [Provide the Title of the Responsible Officer for the Policy]

Key Offices to Contact Regarding the Policy and its Implementation

Links to Procedures or Forms

Date of Initial Policy

Date(s) of Any Revisions

Signature Line for the President or designee

Announcements or Memos Linked to the Policy