

Whistleblower policy

Adopted by the board of **Organization name on date**

*Conflict of interest policy to be maintained and monitored by the **board chair**.*

I. Purpose

In keeping with **Organization's name** (Organization) objective of transparency, ethical behavior and adherence to federal/state regulations and policies set by the board, this policy explains our process for reporting serious concerns in a way that:

- ensures confidentiality
- protects against retaliation
- creates a reporting process that enables the Organization to investigate and take corrective action

This policy is intended to encourage and provide protection to employees, officers, board members and volunteers to raise concerns within the organization prior to seeking resolution outside the Organization. A copy of this policy should be made available through employee, board or volunteer resources.

II. Reporting

It is the responsibility of all employees, officers, board members and volunteers to report credible concerns and complaints about suspected:

- violations of laws and regulations
- violations of the Organization's code of ethics or board policies
- fraudulent or misuse of the Organization's resources, property or programs

Anyone reporting a concern or complaint must be acting in good faith and have reasonable grounds to support their concern. Any allegation that is proven to be unsubstantiated and made maliciously or knowingly to be false will be subject so discipline up to and including termination.

III. No Retaliation

No employee, officer, board member or volunteer who in good faith reports suspected concerns or complaints shall be subjected to retaliation, intimidation, harassment, or other adverse action for reporting information in accordance with this Policy. Any person entitled to protection who believes that he or she is the subject of any form of retaliation should immediately report the violation in accordance with this Policy.

Any individual who retaliates against someone who has reported a violation in good faith is subject to discipline, including termination of employment or volunteer status.

IV. Procedure

1. Reporting and documenting complaints or concerns

Employees or volunteers should first consider sharing their questions, complaints or concerns with their supervisor. If they are not comfortable speaking to their supervisor, or not satisfied with the response, they are encouraged to speak with *suggestion: designated officers*.

Officers or board members should report questions, complaints or concerns to *suggestion: designated officers or board member/committee*.

Anyone who wishes to remain anonymous can also submit their concerns in writing to *suggestion: designated officers or board member/committee*.

2. Investigating and resolving complaints or concerns

The complaint or concern should be documented in a written record, including any substantiating information. The written record should include details of any investigation and final resolution or disposition.

All efforts should be made to protect the confidentiality and privacy of the complainant and people involved in the report. Confidentiality may not be possible where identification is required by law or to enable the Organization or law enforcement to conduct an adequate investigation.

The board (*suggestion: or a board designated committee*) should be informed of complaints and the progress of investigations. The person reporting the complaint should receive an update on the status of the complaint, to the extent this can be done and still protect their identity or confidentiality.

The Organization should take prompt appropriate action which may include the following:

- a. Consulting with legal counsel to decide whether the reported violation requires review and by whom, and what records should be preserved about the investigation
- b. Interviewing employees, volunteers or clients
- c. Requesting and reviewing relevant documents
- d. Requesting that an auditor or legal counsel investigate the complaint