



Example Whistleblower Policy for Councils (from Dogwood Literacy Council, Siloam Springs, 2008)

General

Dogwood Literacy Council requires directors, employees, volunteers, and students to observe high standards of conduct and personal ethics in the conduct of their duties and responsibilities. Employees and representatives of Dogwood Literacy Council must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility

It is the responsibility of all board members, employees, volunteers, and students to report ethics violations or suspected violations in accordance with this Whistleblower Policy. (Ethics violations include harassment of any kind, including sexual harassment.)

No Retaliation

No board member, employee, volunteer, or student who in good faith reports an ethics violation shall suffer harassment, retaliation or adverse employment consequence. 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. (The same principle will apply to any board member, volunteer or student.) This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within Dogwood Literacy Council prior to seeking resolution outside Dogwood Literacy Council.

Reporting Violations

Dogwood Literacy Council has an open door policy and requests that employees, volunteers, or students share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases the Executive Director is in the best position to address an area of concern. However, if you are not comfortable speaking with the Director or you are not satisfied with the Director's response, you are encouraged to speak with any member of the Board of Directors whom you are comfortable in approaching. Employees and volunteers are required to report suspected ethics violations to the Dogwood Literacy Council's Board Chair, who has specific responsibility to investigate all reported violations.

Compliance Officer – Board Chair

The Dogwood Literacy Council's Compliance Officer (the Board Chair) is responsible for investigating and resolving all reported complaints and allegations concerning violations and, at his/her discretion, shall advise the Executive Director and/or the Board of Directors.

Accounting and Auditing Matters

The Executive Committee of the Board of Directors shall address all reported concerns or complaints regarding accounting practices, internal controls, or auditing. The Compliance Officer shall immediately notify the Executive Committee of any such complaint and work with the Committee until the matter is resolved.

Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed 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. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the requirements of the law.

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.

From ALC Office Policies Working Draft of Policy Update – September 2009

Whistleblower Policy

ALC will adhere to all laws and regulations that apply to the organization. The support of all employees is necessary to achieving compliance with laws and regulations. ALC will not tolerate financial impropriety or misuse of its resources.

Complaint Procedures:

If any employee reasonably believes that some policy, practice, or activity of ALC is in violation of law, a written complaint may be sent to the ALC Executive Director and the ALC Board of Directors Executive Committee.

If the employee believes the policy, practice, or activity of ALC is in violation of law because of the actions of the Executive Director, a written complaint may be sent to members of the ALC Executive Committee.

Employees are protected from retaliation only if the employee brings the alleged unlawful activity, policy, or practice to the attention of the Executive Director and/or the ALC Board Executive Committee in writing as outlined above. The employee will also provide ALC with a reasonable opportunity to investigate and correct the alleged unlawful activity.

ALC will not retaliate against an employee who, in good faith, has made a protest or raised a complaint against some practice of ALC or of another individual or entity with whom ALC has a business relationship, on the basis of a reasonable belief that the practice is in violation of a law, or a rule, or regulation mandated pursuant to law.

ALC will not retaliate against an employee who, in good faith, has made a protest or raised a complaint against some practice of ALC or of another individual or entity with whom ALC has a business relationship, on the basis of a reasonable belief that the practice is in violation of a clear mandate of public policy concerning the health, safety, welfare, or protection of others.