

Whistleblower Policy

- A. **Reporting Responsibility:** It is the responsibility of all Board of Director's members, Executive and Program Directors, supervisors and employees to comply with this policy and to report violations or suspected violations in accordance with this policy. Volunteers, consultants and the general public are also encouraged to report any violations or suspected violations.
- B. **No Retaliation:** No person who in good faith reports a violation shall suffer harassment, retaliation, or adverse employment consequence. An employee, supervisor, executive or program director, board member or volunteer who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment or termination of volunteer position. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within the Agency prior to seeking resolution outside the Agency.
- C. **Reporting Violations:** The policy addresses the Agency's open-door policy and suggests that employees share their questions, concerns, suggestions, or complaints with someone who can address them properly. In most cases, the supervisor is in the best position to address an area of concern. However, if you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor's response, you are encouraged to speak with your program director, executive director, HR director or the Finance Committee of the Board of Directors. The location of the meeting can be held at an outside location designated by the agency representative and agreed upon by both parties. Supervisors and managers are required to report suspected violations to the HR Director who has specific responsibility to investigate all reported violations. For suspected fraud, or when you are not satisfied with the results, you may contact the NYS Office of the Attorney General.
- D. **Compliance Officer:** The Agency's Compliance Officer is responsible for investigating and resolving all reported complaints and allegations concerning violations of this policy and advise the Finance Committee of the Board of Directors. The Compliance Officer has direct access to the Finance Committee on compliance activity. The Agency's Compliance Officer is the HR Director.
- E. **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 of the policy. 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.
- F. **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 need to conduct an adequate investigation. These reports can be made to the Agency's Chair of the Board of Directors, Finance Committee Chair or Executive Director.
- G. **Handling of Reported Violations:** The Agency's Executive Director, Chairperson of the Board of Directors or Finance Committee Chairperson will notify the sender and acknowledge receipt of the reported violation or suspected violation within 3 business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation. The person making the claim will be notified after the investigation is complete.
- H. **Publication:** A copy of these provisions shall be distributed to all Directors, Officers, Employees and Volunteers who provide substantial services to the Corporation, or in the alternative, be posted on the Corporation's website that is accessible to the public.