

WHISTLEBLOWER POLICY

Policy on Reporting and Investigating Allegations of Suspected Improper Activities

PREAMBLE

Fulmont Community Action Agency (FCAA) has a responsibility for the stewardship of its resources and the public and private support that enables it to pursue its mission. FCAA is committed to compliance with the laws and regulations to which it is subject and promulgating its policies and procedures to interpret and apply these laws and regulations in the Association setting. Laws, regulations, policies and procedures strengthen and promote ethical practices and ethical treatment of those in community action and those who conduct business with FCAA.

GENERAL

FCAA'S Code of Ethics and Conflict of Interest Policy require Directors, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities and comply with all applicable laws and regulations.

REPORTING RESPONSIBILITY

It is the responsibility of all Directors, officers and employees to comply with the Code of Ethics and the Conflict of Interest Policy and to report violations or suspected violations in accordance with this Policy.

NO RETALIATION

No Director, officer or employee who in good faith reports a violation of the Code 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. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within FCAA prior to seeking resolution outside of the organization.

REPORTING VIOLATIONS

This Policy is meant to be construed as an open door policy and suggests that employees share their questions, concerns, suggestions or complaints with the Executive Director who can address them properly. In the event that an employee is not comfortable speaking to the Executive Director or is not satisfied with the response, the individual may bring his or her concern or complaint to the Board Chairperson.

ACCOUNTING AND AUDITING MATTERS

The Finance Committee of the Board of Directors shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The Executive Director shall immediately notify the Finance 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 of the Code of Conduct or Conflict of Interest policy must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of FCAA's Code or policies. 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 and may be considered a violation of the Code of Ethics.

CONFIDENTIALITY

Violations or suspected violations may be submitted on an anonymous or confidential basis by the complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

HANDLING OF REPORTED VIOLATIONS

Any manager who learns of a complaint that is filed will share it with the Executive director, who 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.

DISTRIBUTION POLICY

The Whistleblower Policy is required to be distributed to all directors, officers, employees and to volunteers who provide substantial services to the agency.