



## WHISTLEBLOWER POLICY

Approved by the Board of Trustees \_\_\_\_\_, 2021

### PURPOSE

Chatham Education Foundation encourages its Trustees, Volunteers, contractors and employees to maintain high ethical standards. This Whistleblower policy is meant to provide a confidential and effective means for reporting suspected violations of the law. It further serves to protect individuals who report suspected violations from retaliation in any form.

### POLICY

#### **General Policy**

All Trustees, Volunteers, contractors, and employees of Chatham Education Foundation will be protected from any disadvantage caused by raising legitimate concerns and shall report suspected illegal activities within an organization.

#### **Confidentiality**

An individual may report a suspected violation anonymously or on a confidential basis, keeping in mind that in the course of the investigation it may become necessary that the source of the complaint be identified.

#### **Retaliation**

No individual who reports a suspected violation in good faith, whether or not the allegations turn out to be correct, shall be subject to any form of retaliation, including harassment, demotion, or firing, by Chatham Education Foundation, its Trustees, Volunteers, contractors or employees. Anyone who retaliates against a complainant shall be subject to disciplinary action.

Chatham Education Foundation will not retaliate against Trustees, Volunteers, contractors or employees who disclose or threaten to disclose to a supervisor or a public body, any activity, policy, or practice of Chatham Education Foundation that the Trustees, Volunteers, contractors or employee reasonably believes is in violation of a law, or a rule or regulation mandated pursuant to law, or is in violation of a clear mandate or public policy concerning the health, safety, welfare, or protection of the environment.

An individual is not required to prove the truth of an allegation, but it is required to act in good faith. Any individual who does not act in good faith in reporting a suspected violation may be subjected to disciplinary action.

**PROCEDURE**

**Open Door Policy**

If a Trustee, Volunteer, contractor or employee reasonably believes that some policy, practice or activity of Chatham Education Foundation is in violation of the law, or a clear mandate or public policy, the Trustee, Volunteer, contractor or employee should share their questions, concerns, suggestions, or complaints with someone who may be able to address them properly. If the concerns are not addressed, the individual should make a formal complaint as outlined below.

**Reporting Violations**

If an individual reasonably believes that some practice of the Chatham Education Foundation, or the Board of Trustees or a board committee, an employee or contractor of Chatham Education Foundation, or another individual or entity with whom Chatham Education Foundation has a business relationship is in violation of the law, the individual must file a written complaint. If the circumstances of the complaint require a reviewer not on the Board of Trustees, then the complaint should be reviewed by an independent person not on the Board.

**Handling Reported Violations**

The recipient of the complaint, i.e., the Board President or a Vice President, will contact the complainant within 10 business days and acknowledge the reported violation was received. The complainant will be notified about what actions will be taken. If no further action or investigation is to follow, an explanation for the decision will be given to the complainant.

Any complainant who reasonably believes they have been retaliated against in violation of this whistleblower policy shall follow the same procedures as they did when they filed the original complaint.

My signature below indicates my receipt and understanding of this policy. I also verify that I have been provided with the opportunity to ask questions about the policy.

Print Name: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_