

ORGANIZATIONAL POLICY

March 5, 2019 (v1)

WHISTLEBLOWERS



The HSCG is committed to operating in furtherance of its tax-exempt purposes and in compliance with all applicable laws, rules and regulations, including those concerning accounting and auditing, and prohibits fraudulent practices by any of its board members, officers, employees, or volunteers.

This policy outlines a procedure for whistleblowers to report actions that they reasonably believe violates a law, or regulation, or that constitutes fraudulent accounting or other practices.

This policy applies to any matter which is related to the HSCG's business, including the business of HSCG Local Chapters, but does not relate to private acts of an individual not connected to the business of the HSCG. Reports against members for violation of the HSCG Code of Ethics should be filed in accordance with the HSCG policy *Ethics Procedures: Violations of the Code of Ethics*.

REPORTING RESPONSIBILITY

It is the responsibility of all directors, volunteers, employees, and members of the HSCG to make a report if they have a reasonable belief that an employee, volunteer or director of the HSCG has engaged in any action that violates any applicable law, which constitutes a fraudulent practice, or is a breach of their fiduciary duty.

Such reports should be submitted to the Executive Director. If the reporting party does not feel comfortable reporting the information to the Executive Director, they may report the information to the HSCG President, the Executive Committee, or the Board of Directors as a whole.

NO RETALIATION

It is contrary to the values of the HSCG for anyone to retaliate against any person who in good faith reports a suspected violation of law, fraudulent practice, discrimination, or other prohibited activity or participates in any resulting investigation or proceeding.

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.

Anyone filing a written complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing a violation has occurred. Any allegations that cannot be substantiated and which prove to have been made maliciously or which were knowingly false will be viewed as a serious disciplinary offense.

INVESTIGATION & RESOLUTION

All reports must be followed up promptly, and a full investigation conducted to determine the facts of the case and to make recommendations for its resolution. The responsibility for investigation and recommendation for resolution is dependent upon who the report was on.

EMPLOYEES

Allegations against employees are investigated by the Executive Director. Disciplinary action may be taken in accordance with the Employee Handbook.

VOLUNTEERS

Allegations against volunteers, including Local Chapter volunteers or Local Chapter Board Members, are investigated by the Executive Director. Termination of the volunteer's services may be implemented by the Executive Director. If any additional disciplinary or legal action is recommended, it must be approved by the Board before being implemented.

LOCAL CHAPTERS

Allegations against Local Chapter volunteers or Local Chapter Board Members are investigated by the Executive Director. The Executive Director must notify the Board of Directors of the allegations, and upon completion of the investigation must submit a report with recommendations. If any disciplinary or legal action is recommended, it must be approved by the Board before being implemented.

EXECUTIVE DIRECTOR

Allegations against the Executive Director are investigated by the Executive Committee. Any such investigations should be done in an executive session. The Executive Committee must notify the Board of Directors of the allegations, and upon completion of the investigation must submit a report with recommendations. If any additional disciplinary or legal action is recommended, it must be approved by the Board before being implemented.

BOARD MEMBERS

Allegations against individual Board Members are investigated by the Board of Directors. The Board member whose actions are being investigated must recuse themselves from the investigation and from the discussion of or vote on any motions concerning the investigation or resultant disciplinary or legal action. Any such investigations by the Board should be done in an executive session.

Where the allegation concerns all, or a majority, of the Board Members, investigation of the allegations should be carried out by the the remaining Board Members and the Ethics Committee. If the investigation finds that disciplinary or legal action is warranted, the matter must be put before the membership at a regular or special meeting held in accordance with the HSCG Bylaws.

DELEGATION / USE OF PROFESSIONALS

Where the Executive Director, Ethics Committee, or Board of Directors are charged with the investigation of an allegation, they may delegate the task of the investigation to a person, committee or outside hired agency as they deem appropriate.

Investigation of legal or financial irregularities may warrant hiring a professional to assist in the investigation, in which case the HSCG shall cover the cost of such consultation.

PRIVACY

In order to protect both the complainant and the person about whom allegations have been made, any person investigating an allegation shall strive to keep the identity of the complainant as well as the nature of the allegations as confidential as possible, while still conducting an adequate investigation.

FILES & RECORDS

After an allegation has been investigated and resolved, all the resultant paperwork including printouts of any pertinent electronic files shall be archived at the HSCG office. Such files shall have restricted access.

Any individual who has copies of paper or electronic documents pertinent to a completed and resolved investigation shall delete all electronic documents and shred any paper documents immediately upon resolution of the investigation.

Approved by the
Board of Directors

History:

March 5, 2019 (v1) Original approval and publication date.