

SUBJECT	Whistleblower Policy			POLICY NO	04-038
EFFECTIVE	REVIEWED	REVISED DATES	06-27-11, 10-24-11		
06-28-10	10-03-16				
REFERENCED POLICIES					
RELATED PROCEDURES					
APPLICABLE TARC FORMS	04-038.001 Acknowledgement Form (Employee) 04-038.003 Acknowledgement Form (Volunteer) 01-011.G01 (08-001.G01) Board-Foundation Board Policy Disclosure Review				

POLICY: *TARC requires directors, officers, volunteers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of TARC, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.*

GUIDELINES:

1. It is the responsibility of all directors, officers, volunteers and employees to report ethics violations or suspected violations in accordance with this Whistleblower Policy, i.e. (a) questionable or improper accounting or auditing matters and (b) violations and/or suspected violations of TARC’s Code of Ethics.
2. This Whistleblower Policy is intended to encourage and enable directors, officers, volunteers and employees to raise concerns within TARC for investigation and appropriate action prior to seeking resolution outside TARC. No director, officer, volunteer or employee who, in good faith, reports a concern shall be subject to retaliation or, in the case of an employee, adverse employment consequences.
3. A volunteer or employee who retaliates against someone who has reported a concern in good faith is subject to discipline up to and including dismissal from the volunteer position or termination of employment.
4. TARC has an open door policy and suggests employees share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, employees should first discuss their concern with their immediate supervisor. If, after speaking with his or her supervisor, the employee continues to have reasonable grounds to believe the concern is valid, the employee should report the concern to the Human Resources Director or Board Treasurer. In addition, if the employee is uncomfortable speaking with his or her supervisor, or the supervisor is a subject of the concern, the individual should report his or her concern directly to the Human Resources Director or Board Treasurer.
5. If the concern was reported verbally to the Human Resources Director or Board Treasurer, the reporting employee, with assistance from the Human Resources Director or Board Treasurer, will record the concern in writing.
6. The Human Resources Director will promptly report the concern to the Board Treasurer, who serves as the chair of the Budget & Finance Committee (TARC’s Audit Committee) which has specific and exclusive responsibility to investigate all concerns. If the Human Resources Director, for any reason, does not promptly forward the concern to the Board Treasurer, the reporting employee should directly report the concern to the Board Treasurer. Contact information for the Board Treasurer may be obtained through the Human Resources Division.
7. Concerns may also be submitted anonymously. Such anonymous concerns should be in writing and sent directly to the Human Resources Director or Board Treasurer.
8. Concerns may also now be submitted through the TARC website at www.tarcinc.org/contactus/
9. Directors, officers and other volunteers should submit concerns in writing directly to the Board Treasurer. Contact information for the Board Treasurer may be obtained from the Human Resources Division.
10. The Board Treasurer will notify the sender of the reported concern an acknowledgement receipt of the concern within five (5) business days, if possible. It will not be possible to acknowledge receipt of anonymously submitted concerns.

11. The Human Resources Director is responsible for investigating all reported complaints and allegations concerning violations and advise the Executive Director and the Board Treasurer of any such report.
12. Appropriate corrective action will be recommended to the Board of Directors, if warranted by the investigation. In addition, action will be taken to include a conclusion and/or follow-up with the complainant for complete closure of the concern.
13. Anyone reporting a concern must act in good faith and have reasonable grounds for believing the information disclosed indicates an improper accounting or auditing practice or a violation of the Code of Ethics. The act of making allegations that prove to be unsubstantiated and that prove to have been made maliciously, recklessly or with the foreknowledge that the allegations are false, will be viewed as a serious disciplinary offense and may result in discipline up to and including dismissal from the volunteer position or termination of employment. Such conduct may also give rise to other actions, including civil lawsuits.
14. Reports of concerns, and investigation pertaining thereto, shall be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.
15. Disclosure of reports of concerns to individuals not involved in the investigation will be viewed as a serious disciplinary offense and may result in discipline, up to and including dismissal from the volunteer position or termination of employment. Such conduct may also give rise to other actions, including civil lawsuits.