



## Whistleblower Policy and Procedure

### **Objective**

The objective of the Denver Inner City Parish's Whistleblower Policy is to establish a policy for the protection of directors, volunteers, employees, and contractors from retaliation, harassment, or adverse employment consequences related to reporting [complaints of] organizational wrongdoing.

### **Reporting Responsibility**

Denver Inner City Parish encourages directors, volunteers, employees, and contractors, to observe high standards of business and personal ethics in the conduct of their duties and responsibilities, including the practice of honesty and integrity in fulfilling their responsibilities and complying with all applicable laws and regulations.

Detailed are the procedures for reporting violations of (a) questionable or improper accounting or auditing matters, and (b) violations and suspected violations of applicable laws and regulations (herein collectively referred to as Concerns); (c) and for the receipt and retention of complaints/reports received.

### **No Retaliation**

The Whistleblower policy is intended to encourage and enable directors, volunteers, employees, and contractors to raise Concerns within the organization for investigation and appropriate action. With this goal in mind, no director, volunteer, employee, or contractor who, in good faith, reports a Concern shall be subject to retaliation or, in the cases of employees, volunteers, and contractors, adverse employment/volunteer consequences related to whistleblower complaints/reports. Moreover, a volunteer, employee, or contractor 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/contract.

### **Acting in Good Faith**

Anyone reporting a Concern must act in good faith and have reasonable grounds for believing the information reported indicates a violation of the law, or constitutes an inappropriate accounting or financial practice. 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 offence 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.

### **Confidentiality**

Reports on Concerns, and investigations pertaining thereto, shall be kept confidential to the extent practical, consistent with the need to conduct an adequate investigation. 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.

**Reporting Concerns**

Directors, volunteers, employees, and contractors should share their Concerns with someone who can address these Concerns adequately. The CEO/Executive Director is most often best-equipped to do so, and should be approached first with Concerns. However, if the whistleblower is not comfortable speaking with the CEO/ Executive Director about the Concern, they are encouraged to speak with their direct supervisor, or if still uncomfortable, then with a representative in Human Resources. The CEO/Executive Director, or Supervisors and Human Resource representatives, are required to report suspected Concerns to the Denver Inner City Parish’s Board of Directors.

For suspected fraud, or when directors/employees/volunteers/contractors are not satisfied or are uncomfortable with following the open door policy, employees should contact the Board of Directors directly.

**Whistleblowers should submit Concerns in writing** to the CEO/Executive Director, or if the concern is in regards to the CEO/Executive Director, then they should submit their concern in writing to their Supervisor or HR Representative. The formal concern should be submitted for review to the Board of Directors.

**Handling Reported Concerns**

The CEO/Executive Director shall address all reported Concerns and notify the board of directors within three business days. The CEO/Executive Director will notify the whistleblower and acknowledge receipt of the Concerns within five business days. It will not be possible to acknowledge receipt of anonymously submitted Concerns.

All reports will be investigated by the CEO/Executive Director, and appropriate corrective action will be recommended to the board of directors, if warranted by the investigation. In addition, action taken must include a conclusion and/or follow-up with the whistleblower for complete closure of the Concern.

The CEO/Executive Director has the authority to retain outside legal counsel, accountants, private investigators, or any other resource deemed necessary to conduct a full and complete investigation of the allegations.

**Statement of Understanding**

I have read and understand the Denver Inner City Parish’s whistleblower policy.

Signed: \_\_\_\_\_

Name(print): \_\_\_\_\_

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