

The Community Partnership

Whistle-Blower Policy

1. General

The Community Partnership requires all volunteers, Board Members, and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. The Partnership is committed to compliance with the laws and regulations to which it is subject and to promulgating policies and procedures to interpret and apply these laws and regulations in the workplace. The Partnership's internal controls and operating procedures are intended to detect and prevent or deter improper activities. However, even the best systems of control cannot provide absolute safeguards against irregularities.

The Partnership provides various mechanisms to assist and encourage volunteers and employees to come forward in good faith with reports or concerns about suspected compliance issues. The Partnership encourages this reporting of suspected wrongdoing on a timely basis.

2. Whistle-Blower Policy

Although The Partnership encourages individuals to report concerns to their immediate supervisor or the departments noted in Section 8 below, there are times when an individual may feel it is necessary to report a concern of financial wrongdoing outside of the traditional reporting mechanism. The Partnership has adopted a whistle-blower policy for these instances. The Whistle-Blower Policy allows allegations to be made outside of the immediate area that the suspected individual is associated with and allows for a degree of confidentiality for the reporting person, if requested.

This Whistle-Blower Policy governs only the reporting and investigation of suspected violations of law, external regulations or Partnership policy of a financial nature or misuse of Partnership resources. Such violations may include, but are not limited to, theft or inappropriate use of cash or other Partnership property, falsification of hours worked for payroll purposes and inappropriate spending of cash through the accounts payable process. The policy is not intended and may not be used for personal or employment grievances, general compensation and benefit complaints, opinions on policy, etc. The board chair will name two Ombudsmen each year. One Ombudsman will be a staff member and one will be named from the board of directors. This year the Ombudsmen are Tom Thomas and Bill Ricker.

To make a report under this policy an individual is required to complete and sign a Whistle-Blower Disclosure Statement, which is located in the kitchen, and on the web page, of The Partnership. Reporting of the violation can be made through the Ombudsman as follows:

In Person – Individuals may visit the office of the Ombudsman during its standard operating hours to file a report, or make arrangements for an appointment during non-standard operating hours.

Mail – Individuals may send to the office of the Ombudsman a completed Whistle- Blower Disclosure Statement. The individual should understand that he/she may need to visit the office of the Ombudsman to answer any questions from the review of the statement.

Individuals should be aware that the filing of the statement noted above acknowledges their understanding that an investigation may commence.

Since successful investigations are many times based upon timely evidence, reports under this policy should be made as soon as possible, preferably within six months of the occurrence, but in any event within one year. An individual may use other means outside of this policy (see Section 8 of this policy) to report a suspected individual after the one-year period.

Filing under the Whistle-Blower Policy differs from other interactions with the Ombudsman. Under the Whistle-Blower Policy an investigation will commence if deemed necessary by The Partnership upon its knowledge of the circumstances.

3. Protection from Retaliation

An individual who in good faith reports a suspected violation of law or Partnership policy shall not suffer harassment, retaliation or adverse employment consequence from other individuals or The Partnership. An individual who retaliates against someone who has reported a suspected violation in good faith is subject to discipline up to and including termination of employment. Any individual who believes that he/she has been retaliated against after making a good faith report may report this alleged retaliation to the Board Chair or Vice Chair.

4. Confidentiality Under the Whistle-Blower Policy

Confidentiality of the individual will be maintained to the extent practical within the limitations of the law, Partnership policy and the legitimate needs of the investigation. In addition, individuals submitting a report should be aware that their public testimony might be needed to prove the case against the suspected individual.

Although an individual's report may possess merit, comments made to others regarding another individual could constitute defamation, invasion of privacy or other grounds for civil liability. Individuals should not discuss allegations outside of the reporting and investigation process. This is especially the case should the investigation prove that the suspected individual's actions were lawful or within Partnership policy.

Note that if an individual self-discloses his or her identity directly or indirectly through his or her own actions outside of the official investigation process, The Partnership is not obligated to maintain confidentiality.

5. Investigation Under the Whistle-Blower Policy

The Ombudsman will maintain the Whistle-Blower Disclosure Statements received in her/his office until the outcome of the investigation. The Ombudsman will not actively participate in an

investigation, but will refer the allegation to the Executive Director, Board Chair, or other officer of the board. The investigator/investigation team has access to all resources of The Partnership and external counsel to ensure a fair and accurate resolution to the alleged violation.

The investigator/investigation team is responsible for documenting its investigation and its rationale for the resolution. That document will be attached to the original Whistle-Blower Disclosure Statement and reside in the office of the Ombudsman during the investigation. The investigation is closed when the Ombudsman has deemed the investigation is complete and the investigator/investigation team reaches a resolution. Documents and evidence relating to a closed investigation will remain in The Partnership's files in the Human Resources Department.

6. Results When Report Made Under the Whistle-Blower Policy

If the result of the investigation is that the allegation is not satisfactorily established, the investigation will be deemed complete. An individual whose claim is deemed unsatisfactory has the opportunity to communicate directly with the Office of Budget and Finance outside of this policy to further pursue his or her claim.

If the investigation establishes that a violation of law, external regulation or Partnership policy occurred, the Executive Director, Board Chair, Director of Budget and Finance, and the Director of the applicable program of the investigated individual will determine appropriate action based upon law and Partnership policy. This decision will be reported to the Ombudsman in writing and attached to the original Disclosure Statement. An individual who has been deemed to have committed an act in violation of law or Partnership policy will have access to the grievance process of The Partnership described in the employee handbook.

Whistle-Blower Disclosure Statements and related documentation will be delivered to the Audit Committee chairperson at the time of each Board Meeting at The Community Partnership Office. The Audit Committee chairperson will review these documents and communicate with the Ombudsman at least once annually to discuss this general policy and any specific occurrences.

7. Sanctions for a False Report

A report made under this policy can have considerable impact on the personal and professional lives of those charged both during the investigation and long term. An individual shall not intentionally misuse The Partnership's Whistle-Blower Policy and procedures. Intentional misuse includes, but is not limited to, frivolous claims, attempts to treat a personal grievance or personnel dispute as an allegation of wrongdoing, lack of good faith in invoking the policy or any known false, malicious or misleading statements made at any time under the procedures of the policy. The Partnership Ombudsman (when involved) will report to the Director of Human Resources, the Director of the applicable office of the individual and the President the identity of any individual who is believed to have intentionally misused the Whistle-Blower Policy. After appropriate review by these individuals, excluding the Ombudsman, the individual is subject to discipline up to and including termination.

8. General Reporting Outside of the Whistle-Blower Policy

All individuals are encouraged to report suspected violations of law or Partnership policy directly to his/her supervisor, outside of the Whistle-Blower Policy. If the individual feels unable to do so or if there is any reason why this may not be appropriate, the individual should raise the issue with the Director of Budget and Finance or Executive Director or other Partnership official/office having responsibility for overseeing compliance with the particular policy or procedure in accordance with the guidance below:

Financial Misconduct

In the event of any claim made outside of the Whistle-Blower Policy concerning conflicts of interest, financial misconduct, inappropriate expenditure of funds, questionable internal controls and accounting practices, or auditing matters, a report can be made to the Ombudsman.

Employment Policies

In the event of any claim concerning discrimination or harassment (including sexual harassment) or any other violation of employment policies, a report can be made to the Budget and Finance Director.

Environmental, Health and Safety

In the event of any claim concerning environmental protection, hazardous conditions, violations of state or federal health or safety, a report can be made to the Ombudsman.

Misuse of Assets

In the event of any claim made outside of the Whistle-Blower Policy concerning the misuse of supplies, equipment, cash, or other property or the unauthorized use of proprietary data and information, unauthorized use of Partnership intangible property, such as The Partnership emblem or the unauthorized release of personal data, a report can be made to the Ombudsman. Misuse of electronic data can also be reported to the Ombudsman.

Data Security

In the event of knowledge regarding the improper use of electronic resources including: computer hardware; computer network and servers; software; data, voice, cable or other related wired or wireless signals of information; the improper handling or use of Partnership electronic data; or any other noncompliance with The Partnership's Personnel Policy, a report should be made to the Ombudsman.

Emergencies, Escort, Personal Harm

In the event of bodily injury, medical emergencies, escort needs, suspicious activity, fire, "Hate Crime" situations or any fear of personal harm to one's self or others, a report should be made immediately to the Police by dialing 911.

Individuals may also report wrongdoing directly to The Partnership Ombudsman outside of the Whistle-Blower Policy when the individual is uncomfortable with the procedures noted in this section and desires a neutral environment.

The Community Partnership
Whistle-Blower Disclosure Statement

Personal Information:

Name: _____

Email Address: _____

Are you requesting confidentiality? Yes No

Incident Information:

Date(s): _____

Name of suspected individual(s):

Witness(es):

Do you have any evidence supporting the allegation? Yes No

If yes, please describe:

Please describe any physical evidence left with the Director of Human Resources/Ombudsman:

Description of the alleged violation (please be as specific as possible and attach additional sheets as necessary):

