

WHISTLEBLOWER POLICY

Purpose

This policy is intended to help assure that NCRP's work exemplifies high standards of ethical, moral and legal business conduct. It enables and encourages employees to raise concerns within the organization and be assured that they will be protected from reprisals for doing so.

Definitions

A whistleblower is an employee who reports an activity that he/she reasonably believes in good faith to be illegal or dishonest, to one or more of the persons specified in this policy. A whistleblower is not responsible for investigating the activity or determining guilt or corrective measures. Appropriate board officials are charged with this responsibility.

Examples of such activities are: violation of state, federal or local laws, fraudulent financial reporting, submission of timesheets for work not performed, activities that otherwise amount to serious improper conduct.

Anyone filing a complaint must be able to show that he/she is acting in good faith and has reasonable grounds for believing that the information disclosed falls within the activities defined above. Allegations that prove to be unsubstantiated or made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

Procedures

If an employee has knowledge of or concern about an illegal or fraudulent activity, the employee should contact one of the following: Executive Director, Chair of the Board of Directors, any member of the Board Audit Committee.

All such reports will be promptly investigated. Insofar as consistent with an efficient investigation, the confidentiality of the whistleblower will be maintained. but may have to be disclosed to conduct a thorough investigation, to comply with the law, or to allow accused individuals an opportunity to defend themselves.

The Audit Committee shall acknowledge receipt of all reported concerns or complaints arising from whistle blowing. Any complaints or concern brought at first to the Executive Director, Chair of the Board, or anyone else, shall be referred promptly to the Audit Committee. Reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

No retaliation

An employee who in good faith acts as a whistleblower shall not suffer harassment, retaliation or adverse employment consequences. The organization will not harass or retaliate against a whistleblower, as defined above. Any employee who believes he/she is being retaliated against must contact one of the individuals named above. Any employee who retaliates against a whistleblower who has reported a violation in good faith is subject to discipline. Protection against retaliation does not include protection for reports made in bad faith or reports not based on reasonable grounds.