WHISTLEBLOWER PROTECTION POLICY

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Policy

The Boys and Girls Clubs of Chaves and Lincoln Counties (BGCCLC) adopts this Whistleblower Protection Policy to encourage the prompt reporting of suspected unlawful, unethical, unsafe, or improper conduct and to support compliance with applicable federal and state laws, including applicable anti-retaliation and document-preservation requirements.

This policy applies to employees, applicants, volunteers, board members, contractors, and agents of BGCCLC. A person who, in good faith, reports suspected waste, fraud, abuse, financial misconduct, misuse of Club resources, a violation of law or policy, a threat to child or workplace safety, or other unethical or improper conduct will not be discharged, disciplined, threatened, harassed, discriminated against, or otherwise retaliated against because of the report or participation in an investigation.

Reports will be reviewed promptly and investigated in a fair and impartial manner. Protection from retaliation applies even when an investigation does not substantiate the concern, provided the report was made in good faith. Retaliation includes, but is not limited to, termination, demotion, suspension, reduction in hours, harassment, intimidation, threats, unfavorable scheduling, denial of promotion, or other adverse treatment.

Procedure

A concern may be reported orally or in writing and should include enough information to allow BGCCLC to understand and review the concern. Reports may be made through any of the following channels:

- Report the concern to the CEO or the President of the Board by email, telephone, or in person.
- Submit a written report to the CEO or President of the Board. A report may be submitted anonymously; however, providing contact information may assist the investigation.
- If the concern involves the CEO, the report must be made to the President of the Board. If the concern involves the President of the Board, the report must be made to another disinterested Board officer or the chair of the Finance Committee. A person named in or personally affected by a report may not direct or control the investigation.
- A reporting person may also make a report directly to an appropriate governmental, licensing, law-enforcement, or funding authority when required or permitted by law. Nothing in this policy requires a person to report internally before contacting an outside authority.
- BGCCLC will protect the confidentiality of the reporting person and the information reported to the extent reasonably possible, consistent with the need to conduct a complete investigation and comply with legal, licensing, safety, grant, and disclosure obligations.
- The CEO will arrange for a prompt, objective review unless the CEO is involved in the matter. When the CEO is involved or has a conflict, the President of the Board or another disinterested Board officer will oversee the review. Investigators must be free from personal, familial, supervisory, financial, or other conflicts that could affect impartiality.

- Employees, volunteers, board members, contractors, and agents must cooperate honestly with authorized investigations and preserve relevant records. No person may conceal, alter, destroy, or direct another person to destroy records that may relate to a report, investigation, audit, legal hold, or official proceeding.
- Any person who believes retaliation has occurred must report it immediately through any reporting channel listed in this policy. Confirmed retaliation or interference with an investigation may result in disciplinary action, up to and including termination of employment, volunteer service, contractual relationship, or Board service, as applicable.
- Knowingly making a false report or intentionally providing false information is not protected by this policy and may result in corrective or disciplinary action. A good-faith report that is not substantiated is not a false report and will not result in discipline.
- Reports, investigation materials, findings, and corrective-action documentation will be maintained securely and retained in accordance with the Document Retention Policy and any applicable legal hold, licensing, grant, insurance, or contractual requirement.

BGCCLC will respond to and follow up on reports as follows:

- When contact information is available, acknowledge receipt and, when appropriate, provide the reporting person with a general summary of the outcome. Information may be limited to protect confidentiality, privacy, child information, personnel information, legal privilege, and the integrity of the investigation.
- Take appropriate corrective action when warranted, which may include operational changes, personnel action, policy or training changes, recovery of funds or property, additional monitoring, or referral to the Board.
- Notify law enforcement, a licensing or child-protection authority, a funding agency, legal counsel, an insurer, or another appropriate authority when required by law, contract, grant, licensing requirements, or the circumstances of the report.