

Great Swamp Watershed Association

WHISTLEBLOWER POLICY

Effective 2015

General

Great Swamp Watershed Association (GSWA) requires trustees, advisory council members, other volunteers, and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Employees and representatives of the organization must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

The objective of the GSWA Whistleblower Policy is to establish policies and procedures for:

The submission of concerns regarding questionable financial, accounting, audit, other organizational business matters, or suspected violations of law or regulations that govern the organization's operations by employees, trustees, volunteers, and other stakeholders of the organization, on a confidential and anonymous basis.

The receipt, retention, and treatment of complaints received by the organization regarding such matters.

The protection of trustees, volunteers, employees and other stakeholders reporting concerns from retaliatory actions.

Reporting Responsibility

Each trustee, advisory council member, volunteer, and employee of GSWA has an obligation to report, in accordance with this policy, questionable or improper financial, accounting, audit, other organizational business matters, or suspected violations of law or regulations that govern the organization's operations .

All reported concerns will be forwarded to the Chairman of the Board of Trustees (Chairman) and the Executive Director, who shall be responsible for investigating and making appropriate recommendations to the Board of Trustees.

No Retaliation

This policy is intended to encourage and enable trustees, advisory council members, volunteers, employees, and other stakeholders to raise concerns within the organization for investigation and appropriate action. With this goal in mind, no one who reports a concern shall be subject to retaliation, or in the case of an employee, adverse employment consequences. Moreover, a trustee or employee who retaliates against someone who has reported a concern in good faith is subject to discipline up to and including dismissal or termination of employment, or removal from the Board of Trustees.

Reporting Concerns

Employees

Employees should first discuss their concern with the Executive Director. If, after speaking with the Executive Director, the individual continues to have reasonable grounds to believe the concern is valid, or if the Executive Director is the subject of the concern, the individual should report his or her concern directly to the Chairman.

Concerns should be discussed verbally with the Executive Director and shall also be reduced to writing. Concerns may also be submitted anonymously.

Trustees and other volunteers

Trustees and other volunteers should submit concerns in writing directly to the Chairman or the Executive Director. Concerns may also be submitted anonymously.

Handling of reported violations

The Executive Director and the Chairman shall address all reported concerns. The concern shall be acknowledged by the Chairman or Executive Director within five business days, unless the concern is submitted anonymously. All concerns will be promptly investigated and appropriate corrective action will be recommended to the Board of Trustees, if warranted by the investigation. Corrective action, if appropriate, will be implemented as quickly as possible. In addition, corrective actions will be documented in writing and reported upon to the reporting individual, unless reported anonymously. The Board may retain outside legal counsel, accountants, or other professionals to conduct a thorough and complete investigation.

Acting in good faith

Anyone reporting a concern must act in good faith and have reasonable grounds for believing the information disclosed constitutes an improper action. The act of making allegations that prove to be unsubstantiated, and have been made maliciously, recklessly, or with foreknowledge that the allegations are false, will be viewed as a serious disciplinary offense and may result in discipline, up to and including removal from the Board or volunteer position or termination of employment. Such conduct may also give rise to other legal action.

Confidentiality

Reports of concerns, and investigations pertaining thereto, shall be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Disclosure of concerns or investigations thereof to individuals not involved with the investigation will be viewed as a serious disciplinary offense. They may result in discipline, up to and including removal from the Board or volunteer position or termination of employment. Such conduct may also give rise to other legal action.