



BOYS & GIRLS CLUBS OF CENTRAL GEORGIA

WHISTLEBLOWER POLICY

Whistleblower Policy

This policy is designed to address situations in which an employee suspects another employee has engaged in illegal acts or questionable conduct involving the Boys & Girls Club of Central Georgia (here after the “BGCCG”) assets. The following is a non-exhaustive list of the kinds of situations that should be reported:

- Supplying false or misleading information on the BGCCG’s financial or other public documents, including its Form 990
- Providing false information to or withholding material information from the BGCCG’s board or auditors.
- Destroying, altering, mutilation, concealing, covering up, falsifying, or making a false entry in any records that may be connected to an official proceeding, in violation of federal or state law or regulations.
- Altering, destroying, or concealing a document, or attempting to do so, with the intent to impair the document’s availability for use in an official proceeding or otherwise obstructing, influencing, or impeding any official proceeding, in violation of federal or state law or regulations.
- Embezzling, self-dealing, private inurement (i.e. BGCCG earnings inuring to the benefit of a director, officer, or senior management) and private benefit (i.e. BGCCG assets being used by anyone in the organization for personal gain or benefit).
- Paying for services or goods that are not rendered or delivered.
- Facilitating or concealing any of the above or similar actions.

If an employee suspects illegal conduct or conduct involving misuse of the BGCCG assets or in violation of the law, he or she may report it orally or in writing, anonymously if the employee wishes, and will be protected against any form of harassment, intimidation, discrimination, or retaliation for making such a report in good faith.

Employees can make a report to any of the following BGCCG executives at any time: President/CEO, Finance & Business Director, Vice President of Programs & Operations, Vice President of Resource Development or Director of Operations. The BGCCG will promptly conduct an investigation into the matters reported, keeping the informant’s identity as confidential as possible consistent with our obligation to conduct a full and fair investigation.

If the issue is severe--- the Executive Committee of the board of directors will be notified. The determination of severity and/or board involvement will be determined by the President/CEO.

REPORTING PROCEDURE

Compliance with the BGCCG's Whistleblower Policy is the responsibility and obligation of every staff member. Early identification and resolutions of any violation of the Policy is critical to compliance with the Policy and to maintaining the BGCCG's commitments to staff members, volunteers, affiliated organizations and donors. All staff members are expected to treat compliance with the principles and procedures embodied in the Policy as a critical element of their responsibilities. The President/CEO and/or Finance and Business Director have been designated as the staff members responsible for overseeing compliance with this requirement.

A. Reporting Violations

All violations or suspected violations of the Policy are to be reported to the President/CEO and/or Finance and Business Director. Staff members are encouraged to provide as much specific information as possible including names, dates, places, and events that took place and the individual's perception of why the incident(s) may be a violation of the Policy. Reports can be made either orally or in writing and may be anonymous.

All reports should be made in good faith and staff members should avoid allegations made with reckless disregard for their truth or falsity or knowing false allegations. Individuals making such allegations may be subject to disciplinary action up to and including termination by the BGCCG, and/or legal claims by individuals accused of such conduct.

While the Policy sets forth a wide range of prohibited conduct, it cannot address every issue that may arise. If a Staff member is unsure of what to do in a particular situation, he or she should seek additional guidance and information before taking any action. If something seems unethical or improper, or if there are questions regarding the best course of action, the staff members should promptly contact the President/CEO and/or Finance and Business Director.

B. Rights & Responsibilities

Employees involved with a report and/or investigation should take care in dealing with suspected misconduct to avoid baseless allegation, premature notice to persons suspected of misconduct and/or disclosure of suspected misconduct to others not involved with the investigation and violations of a person's right under law.

Due to the important yet sensitive nature of the suspected violations, effective professional follow-up is critical. Supervisors, while appropriately concerned about “getting to the bottom” of such issues, should not in any circumstances perform any investigative or other follow-up steps on their own. Accordingly, a supervisor who becomes aware of suspected misconduct should not contact the person suspected for further investigation into the matter or demand restitution, should not discuss the case with attorneys, the media, or anyone other than the President/CEO and/or Finance and Business Director, and should not report the case to an authorized law enforcement officer without first discussing the case with the President/CEO and/or Finance and Business Director.

C. Self-Disclosure

Staff members shall also disclose any situation involving his or her own conduct that may have the potential to be misinterpreted by others. If a staff member has any questions regarding his or her own conduct, the staff member shall discuss the matter with the President/CEO and/or Finance and Business Director.

D. Investigation of Reports

All relevant matters, including suspected but unproved matters, will be reviewed and analyzed, with documentation of the receipt, retention, investigation, and treatment of the report. Staff members must cooperate with any investigation and provide accurate and truthful information. Staff members must not disclose or discuss the fact that an investigation is being conducted or has been conducted and must not disclose the results of any investigation to anyone except to the extent allowed by the President/CEO and/or Finance and Business Director. If possible, the staff member making the initial report will be informed about the status of the investigation and the outcome of the matter. However, the BGCCG has an obligation of confidentiality of all staff members, including those being investigated.

E. Retaliation Prohibited

Retaliation of any kind against any individual who reports a violation or possible violations of the Policy in good faith is prohibited, as is retaliation of any kind against any individual who cooperates in good faith in any investigation of a violation or possible violation of the policy, whether conducted internally or by legal authorities. Retaliation of any kind against a staff member who refuses to carry out a directive which, in fact, constitutes a violation of the Policy is also prohibited. Any individual engaging in retaliatory conduct will be subject to disciplinary

action up to and including termination. If requested and to the extent possible, every effort will be made to maintain the confidentiality of any report made.

F. Disciplinary Action

Any staff member violating the Policy will be subject of disciplinary action, up to and including reprimand, suspension, and termination, and could be subject to civil or criminal legal proceedings.

Agreement Statement

I, _____, have reviewed the Directors and Officers of the Boys & Girls Clubs of Central Georgia's "Whistleblower Policy" and agree to abide by this policy during my term(s) of service.

Signature

Dated