

REPORTING OF A VIOLATION OF NAEYC POLICIES/PROCEDURES (WHISTLEBLOWER & ANTI-FRAUD POLICY)

Purpose

The purpose of this policy is to promote consistent, legal, and ethical behavior and to provide all staff, Governing Board members, committee members, and other such representatives with guidelines for reporting unethical, illegal or fraudulent behavior conducted by National Association for the Education of Young Children (NAEYC) members of the Governing Board and other NAEYC Governance participants, NAEYC staff, vendors, professional service providers, or affiliated organizations. The NAEYC Conflict of Interest Statement and Confidentiality Agreement require the Governing Board, officers and staff of NAEYC to observe the highest standards of business and personal ethics in the conduct of their duties and responsibilities. Unethical, illegal, or fraudulent situations may pertain to:

- Fraudulent or negligent accounting
- Misappropriation or misuse of resources/funds
- Conflict of interest
- Breaches of confidentiality
- Harassment or discrimination
- Safety or security hazards
- Theft

As staff and representatives of the NAEYC, we all must practice integrity in fulfilling our responsibilities and comply not only with all applicable laws and regulations, but also all approved NAEYC policies and procedures.

Reporting Responsibility

It is the responsibility of all NAEYC Governing Board members, committee members, and staff to comply with this policy and to report suspected violations of fraud, theft, illegal, or other unethical activity.

Reporting Procedures

Staff or representatives who suspect improprieties and/or misconduct are encouraged to share their questions, concerns, suggestions, or complaints with the Executive Director, Deputy/Associate Executive Director(s), Senior Director of Human Resources or internal General Counsel. Additionally, it is the responsibility of the NAEYC management to ensure that the NAEYC President is promptly made aware when such reports are made.

Accounting and Financial Matters

The Executive Director and/or their designee, or independent party, such as the NAEYC outside auditors, shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or financial matters. The Executive Director shall notify the NAEYC President of any such complaint and work with the appropriate parties until the matter is resolved.

Legal and Policy Violations

The Senior Director of Human Resources, in conjunction with the NAEYC Legal Counsel, shall address all reported concerns or complaints regarding illegal and inappropriate conduct pertaining to policy violations. The Senior Director of Human Resources shall immediately notify the Executive Director of any such complaint and work with the Association's Legal Counsel, if necessary, until the matter is resolved. The Executive Director shall determine further reporting of the complaint dependent on his/her assessment of the seriousness of the matter.

Anonymous Reporting

NAEYC staff or representatives who are more comfortable reporting their concerns to a neutral third party may do so by calling or emailing a third party reporting organization resource that allows the complainant to report their concerns anonymously by phone or via the internet. It is toll-free and internet accessible around the clock every day. (See the FAQ's tab on the Web Portal for information on how to utilize NAEYC's neutral third party contractor, Ethics Point.)

When an individual contacts the neutral third party organization, a trained Communication Specialist, who does not work directly for NAEYC, asks a series of questions to better understand the nature of the concern. The Specialist prepares a report that is forwarded to designated NAEYC representatives for review, and if necessary, an investigation is conducted. The neutral third party organization is not intended to be a substitute for meaningful communication between staff and his/her manager. If the complainant has questions or concerns regarding normal operating procedures or suggestions for making their workplace more comfortable or efficient, they are encouraged to discuss this matter directly with their supervisor or senior management.

No Retaliation

No NAEYC staff or representative who in good faith reports a violation of this policy shall suffer any form of retaliation or adverse employment consequence. NAEYC staff who retaliate against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This policy is intended to encourage and enable staff and others to raise serious concerns within the Association prior to seeking resolution outside of NAEYC.

Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violation of fraudulent, improper, or illegal activity must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the NAEYC's policies and procedures. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously through the third party reporting organization. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate and thorough investigation of the complaint.

Final Reporting

The Executive Director shall determine the exact nature of the final reporting of the alleged incident or violation. In all cases, the complainant shall be notified of the results of the investigation. The President shall be advised of all reports on financial or accounting matters. The Executive Director shall determine further reporting on all other complaints.

Attachment -- Ethics Point FAQ's tab on our web portal

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