

Whistleblower Policy

POLICY

GSWPA is committed to the highest possible standards of financially ethical, moral and legal business conduct. GSWPA requires all employees, volunteers and all other representatives to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Employees, volunteers and representatives of GSWPA must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

PURPOSE

To provide an avenue for employees, volunteers and others to raise concerns regarding the handling of the council's finances and to provide reassurance that they will be protected from reprisals or victimization for whistleblowing in good faith.

PROCEDURE

This policy is intended to cover the following internal financial concerns:

- questionable accounting, auditing, or financial reporting methods
- illegal or unethical financial practices
- fraudulent or dishonest use or misuse of the council's financial resources

It is the responsibility of all employees, volunteers and other representatives of GSWPA to report the knowledge or suspicion of such actions in accordance with this policy.

Employment related concerns should continue to be reported through the proper channels as addressed in the personnel policy handbook, by reporting such concerns to your immediate supervisor and following the chain of command in your department.

Reporting a Concern

Serious concerns relating to financial reporting or financially unethical or illegal conduct should be reported in either of the following ways:

- via the internet-based reporting tool, EthicsPoint: A report can be filed from home or from any computer that has access to the internet. Go to www.gswpa.org and click on the WhistleblowerPolicy/EthicsPoint link or go to www.ethicspoint.com directly.
- through the EthicsPoint toll-free hotline: 855-230-8387, which is available 24 hours a day, 365 days a year

The earlier the concern is expressed, the easier it is to take action.

Once a concern is reported to EthicsPoint, the individual making the report, the whistleblower, will be assigned a unique code called a “report key”. After several days the whistleblower will be able to call in or log on to the EthicsPoint website and use the “report key” to check the report for feedback and/or status of the report.

All reports submitted through EthicsPoint will be handled promptly and discreetly.

Investigation

EthicsPoint will immediately inform the GSWPA Point of Contact of any report made.

All reports will be promptly reviewed and investigated, and appropriate corrective action will be recommended to the Board of Directors, if warranted by the investigation. In addition, action taken must include a conclusion and/or follow-up with the individual reporting the concern for complete closure, unless the report was given anonymously.

The council has the authority to retain outside legal counsel, accountants, private investigators, or any other resource deemed necessary to conduct a full and complete investigation of the allegations.

Acting in Good Faith

Anyone reporting a concern must act in good faith and have reasonable grounds for making the report. The act of making allegations that prove to be unsubstantiated, or that prove to have been made maliciously, recklessly, or with the foreknowledge that the allegations are false, will be viewed as a serious disciplinary offense and may result in discipline, up to and including termination of employment or dismissal from a volunteer position. Such conduct may also give rise to other actions, including civil lawsuits.

No Retaliation

This policy is intended to encourage and enable individuals to raise concerns for investigation and appropriate action. With this goal in mind, no one who, in good faith, reports a concern shall be subject to retaliation, or in the case of an employee, adverse employment consequences. Moreover, a volunteer or employee who retaliates against someone who has reported a concern in good faith is subject to discipline up to and including termination of employment or dismissal from a volunteer position.

Confidentiality

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

Disclosure of such reports to individuals not involved in the investigation will be viewed as a serious disciplinary offense and may result in discipline, up to and including termination of employment. Such conduct may also give rise to other actions, including civil lawsuits.

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