



SAVE THE FAMILY

*Foundation of Arizona*

## **Whistleblower Protection Policy**

### **POLICY:**

Save the Family's Code of Ethics and Conduct requires directors, officers, employees and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the Organization, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations. It is the responsibility of all directors, officers, employees, and volunteers to comply with the Code and to report violations or suspected violations in accordance with this Whistleblower Policy.

The report will be investigated, and even if determined not to be waste, fraud, or abuse, the individual making the report will not be retaliated against. There will be no punishment for reporting problems, including firing, demotion, suspension, harassment, failure to consider the employee for promotion, or any other kind of discrimination.

### **PROCEDURE:**

#### **Reporting Responsibility**

It is the responsibility of all directors, officers and employees to comply with the Code and to report violations or suspected violations in accordance with this Whistleblower Policy.

#### **No Retaliation**

No director, officer, or employee who in good faith reports a violation of the Code shall suffer harassment, retaliation or adverse employment as a result of such a report. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within the Organization prior to seeking resolution outside the Organization.

#### **Reporting Violations**

The Code addresses the Organization's open door policy and suggests that employees share questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, an employee's supervisor is in the best position to address an area of concern. However, if the employee is not comfortable speaking with the supervisor or the employee is not satisfied with the supervisor's response, the employee is encouraged to speak to the Human Resources Department or anyone in management whom he/she is comfortable in approaching. Supervisors and managers are required to report suspected violations of the Code of Conduct to the Organization's Compliance Officer, who has specific and exclusive responsibility to

investigate all reported violations. For suspected fraud, or when an employee is not satisfied or uncomfortable with following the Organization's open door policy, individuals should contact the Organization's Compliance Officer directly.

### **Compliance Officer**

The Organization's Compliance Officer is responsible for investigating and resolving all reported complaints and allegations concerning violations of the Code and, at his discretion, shall advise the Executive Director and/or the audit committee. The Compliance Officer has direct access to the audit committee of the board of directors and is required to report to the audit committee at least annually on compliance activity.

### **Accounting and Auditing Matters**

The audit committee of the board of directors shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The Compliance Officer shall immediately notify the audit committee of any such complaint and work with the committee until the matter is resolved.

### **Acting in Good Faith**

Anyone filing a complaint concerning a violation or suspected violation of the Code must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Code. 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. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

### **Handling of Reported Violations**

The Compliance Officer will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if necessary by the investigation. If warranted, Save the Family will contact law enforcement officials to deal with any criminal activity

**Audit Committee Compliance Officer – Denise Lowell-Britt - (480) 461-5333**  
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### **Methods for Reporting Waste, Fraud, or Abuse**

- Contact our Compliance Officer (ombudsman - third party, designated to investigate any reports).
- Send an email to a designated address that STF has set up for this purpose.
- Make a report in writing and turn it into the Executive Director and Human Resources.

## Investigating the Report

- The Compliance Officer with the cooperation of Save the Family staff will investigate the allegation
- A report of the findings will be generated and presented to the person filing the report, management, and the STF Board Members
- Immediate steps will be taken to deal with the issues addressed, including making operational or personnel changes
- If warranted, Save the Family will contact law enforcement officials to deal with any criminal activity

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