

# Community of Christ Onset Campgrounds

POLICY: Whistleblower Protection

POLICY CATEGORY: Board Operations - Ethics

DATE EFFECTIVE: 06/27/2020 by vote of the Onset Board of Trustees

APPROVED: Signature on Original  
Missy Quay / Mission Center President

Signature on Original  
Kristin Carter Smith / Onset Board of Trustees Chair

## PURPOSE:

This policy provides clear definitions and provisions for handling allegations of misconduct while protecting the organization under difficult circumstances.

In keeping with the policy of maintaining the highest standards of conduct and ethics, any suspected fraudulent or dishonest use or misuse of the Onset Campground's resources or property by staff, board members, consultants, or volunteers will be investigated by The Onset Board of Trustees (OBOT) and / or the Community of Christ Church.

Staff, board members, consultants, volunteers, and community members are encouraged to report suspected fraudulent or dishonest conduct (i.e., act as a "whistleblower"), pursuant to the procedures set forth below.

## REPORTING:

A person's concerns about possible fraudulent or dishonest use or misuse of resources or property should be reported to his or her supervisor, or if suspected by a volunteer, to the staff member supporting the volunteer's work. If, for any reason, a person finds it difficult to report his or her concerns to a supervisor or staff member supporting the volunteer's work, the person may report the concerns directly to the Chairman of the Board of Trustees or the Mission Center President (Executive Officer). Alternately, to facilitate reporting of suspected violations where the reporter wishes to remain anonymous, a written statement may be submitted to one of the individuals listed above.

## DEFINITIONS:

**Baseless Allegations** — Individuals making allegations with reckless disregard for their truth or falsity may be subject to disciplinary action, and/or legal claims by individuals accused of such conduct.

**Fraudulent or Dishonest Conduct** — A deliberate act or failure to act with the intention of obtaining an unauthorized benefit. Examples of such conduct include:

- forgery or alteration of documents
- unauthorized alteration or manipulation of computer files
- fraudulent financial reporting
- pursuit of a benefit or advantage in violation of the Conflict-of-Interest Policy
- misappropriation or misuse of Grounds' resources, such as funds, supplies, or other assets
- authorizing or receiving compensation for goods not received or services not performed.
- authorizing or receiving compensation for hours not worked

**Whistleblower** — An employee, consultant, volunteer, or member who informs a supervisor or administrative executive about an activity relating to Onset Campgrounds which that person believes to be fraudulent or dishonest.

## RIGHTS AND RESPONSIBILITIES:

### **Supervisors:**

Supervisors are required to report suspected fraudulent or dishonest conduct to an Executive Officer. Reasonable care should be taken in dealing with suspected misconduct to avoid:

- baseless allegations
- premature notice to persons suspected of misconduct.
- disclosure of suspected misconduct to others not involved with the investigation.
- violations of a person's rights 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 to further investigate the matter or demand restitution
- discuss the case with attorneys, the media, or anyone other than the appropriate Executive Officer
- report the case to an authorized law enforcement officer without first discussing the case with the appropriate Executive Officer

### **Investigation:**

All relevant matters, including suspected but unproven matters, will be reviewed and analyzed, with documentation of the receipt, retention, investigation, and treatment of the complaint. Appropriate corrective action will be taken, if necessary, and findings will be communicated to the reporting person and his or her supervisor. Investigations may warrant investigation by independent persons such as auditors and/or attorneys.

## **Whistleblower Protection:**

Whistleblowers will be protected as defined below:

- The Onset Board of Trustees will use its best efforts to protect whistleblowers against retaliation. Whistleblowing complaints will be handled with sensitivity, discretion, and confidentiality to the extent allowed by the circumstances and the law. Generally, this means that whistleblower complaints will only be shared with those who have a need to know so that the Board can conduct an effective investigation, determine what action to take based on the results of any such investigation, and in appropriate cases, with law enforcement personnel. (Should disciplinary or legal action be taken against a person or persons as a result of a whistleblower complaint, such persons may also have the right to know the identity of the whistle blower.)
- Employees, consultants, volunteers, and members of the Onset Campgrounds may not retaliate against a whistleblower for informing management about an activity which that person believes to be fraudulent or dishonest with the intent or effect of adversely affecting the terms or conditions of the whistleblower's employment, including but not limited to, threats of physical harm, loss of job, punitive work assignments, or impact on salary or fees. Whistleblowers who believe that they have been retaliated against may file a written complaint with the Chairman of the Board. Any complaint of retaliation will be promptly investigated, and appropriate corrective measures taken if allegations of retaliation are substantiated. This protection from retaliation is not intended to prohibit supervisors from taking action, including disciplinary action, in the usual scope of their duties and based on valid performance-related factors.
- Whistleblowers must be cautious to avoid baseless allegations (as described earlier in the definitions section of this policy).

Date Created: 06/27/2020

Dates Reviewed: 6/22/2021 - reformatted

Date Revised:

Date Deleted/Superseded:

2020-3.0