



Whistleblower Protection Policy

This Whistleblower Protection Policy is distinguished from the Conflict Resolution Policy in that employees who are aware of illegal or dishonest behavior within the organization need not first confront the person alleged to have committed the infraction, but should immediately report it to the appropriate CCPC representative (see below).

A "whistleblower" is defined as a CCPC employee who reports to an appropriate authority any activity that he or she considers to be illegal or dishonest. The whistleblower is not responsible for investigating the activity or for determining fault or corrective measures, as appropriate management officials are charged with these responsibilities.

Examples of illegal or dishonest activities include but are not limited to: theft; other violations of federal, state or local laws; fraudulent financial reporting; or intentional misrepresentation of facts to donors or other constituents.

If an employee suspects or is aware of illegal, dishonest or fraudulent activity, the employee must contact his/her immediate supervisor, and either the Director of Finance or the Executive Director. The employee receiving the information must promptly submit it to the Board of Directors. If the allegation involves the Director of Finance or the Executive Director, or the employee is uncomfortable going to someone within the organization, the employee should report the allegation to an un-involved Board Member or the designated Board Ombudsman, Linda Wells at #650-804-4684.

Although the whistleblower need not fully investigate the matter before reporting it, he or she must exercise reasonable judgment to avoid baseless allegations. A whistleblower who *intentionally* files a false report of wrong doing will be subject to discipline, which may include termination.

Though protecting the whistleblower's identity is a high priority, CCPC balances the desire to protect the confidentiality of the whistleblower with the need to sufficiently conduct a thorough investigation, comply with the law, and/or to provide accused individuals their legal right of defense. CCPC will notify the whistleblower if it becomes necessary to reveal his or her identity.

CCPC will not tolerate retaliation against a whistleblower. This includes, but is not limited to, protection from retaliation in the form of an adverse employment action such as termination, compensation decreases, inappropriate work assignments, or threats of physical harm. Any whistleblower who believes he/ she is being retaliated against must contact the Director of Finance or Executive Director immediately. The right of a whistleblower to protection against retaliation does not include immunity from investigations of personal wrongdoing or legitimate measures taken to address any unrelated performance failures.

Contacting Us If you have comments or questions about our Whistleblower Protection Policy, please send us an email at rob@ccofpc.org or call us at (435) 649-2260.