


<b>Category:</b>	Employee Accountability	<p style="text-align: center;"><b>INCA Community Services Personnel Policy</b></p> 
<b>Sub Category:</b>	Legal & Ethical Conduct	
<b>Effective Date:</b>	1984 update 2012	
<b>Reviewed Date:</b>	07/16, 04/18, 04/19, 4/20, 4/21, 4/22, 4/23	
<b>Forms:</b>		
<b>Responsible:</b> Executive Director, Chairman of the Board, Directors, employees, volunteers		

## Whistleblower Policy

### Purpose

INCA Community Services Code of Ethics requires directors, 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 INCA, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

### Policy

This Whistleblower Policy is intended to encourage and enable employees, volunteers and community members to raise concerns within the organization for investigation and appropriate action. No board member, director, consultant, employee, volunteer, community members or contractors who in good faith reports a violation of the code, agency policies, or law shall suffer harassment, retaliation or adverse employment consequences.

It is the intent of INCA Community Services to adhere to all laws and regulations that apply to the organization, and the underlying purpose of this policy is to support the organization's goal of legal compliance. The support of all employees is necessary to achieving compliance with various laws and regulations.

Board members, directors, consultants, employees, volunteers, contractors, and community members are encouraged to report suspected fraudulent or dishonest conduct or problems with services provided, pursuant to the procedures set forth below. This policy supplements, and does not replace, any procedures required by law, regulation, or funding source requirements.

The protection described below is only available to employees that comply with this requirement.

### Reporting Responsibility

It is the responsibility of all directors, employees, and volunteers to comply with and report violations or suspected violations of the Code of Ethics, agency and policies, or laws in accordance with this policy.

### Reporting

- A person's concerns about possible fraudulent or dishonest use or misuse of resources or property, or program operation, should be reported to the following people dependent on who is filing the concern:
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  - Chairperson of the Board - Board Members
  - Executive Director - Consultants and Contractors, Directors, Staff, Volunteers, Client or Community Members
- If, for any reason, a person finds it difficult to report his or her concerns to such a person, concerns can be reported directly to the Executive Director and/or the Chairperson of the Board of Directors. Alternatively, 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.

### **Investigation**

- All relevant matters, including suspected but unproved matters, will be promptly reviewed and analyzed, with documentation of the receipt, retention, investigator, and treatment of the complaint.
- Appropriate corrective action will be taken, if necessary, and findings may be communicated to the reporting person and his or her supervisor, if appropriate.
- Investigations may be conducted by independent persons such as auditors and/or attorneys.
- Investigators will endeavor to maintain appropriate confidentiality, but confidentiality is not guaranteed.

### **No Retaliation**

- No board member, director, employee, volunteer, consultant, contractor, client, or community member who in good faith reports suspected fraudulent or dishonest use or misuse of its resources or property or complaints concerning the service it provides and programs INCA runs shall suffer harassment, retaliation, or adverse employment or other consequences.
- 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 agency prior to seeking resolutions outside the agency. The policy is in addition to any non-retaliation requirements contained in the Personnel Policies and Procedures or required by law.
- 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.
- Individuals making complaints must be cautious to avoid baseless allegations; employees who intentionally make false allegations are subject to disciplinary action in accordance with INCA's Personnel Policies and Procedures.

### **Dissemination of Policy**

The policy will be made available to all employees through the agency's website. The agency will educate and train employees and supervisors regarding the policy and any conduct that could constitute a violation of the policy.