



# Whistleblower Protection

*November 18, 2020*

## **Applicability**

This Whistleblower Protection Policy applies to all PRPS employees, whether full-time, part-time, or temporary; to all volunteers; to all members; to all who provide contract services; and to all officers and directors, each of whom is entitled to protection.

This policy enables the ability to raise serious concerns within the Society prior to seeking resolution outside the organization. Each individual is expected to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. These behaviors are outlined in the Member Code of Ethics, Organizational Culture Statement, Volunteer Committee Service Responsibilities, and Conflict of Interest Policy.

## **Reporting Responsibility**

All employees, directors, volunteers, members and contractors are responsible to comply with all PRPS policies and applicable laws and regulations, and report violations or suspected violations in accordance with this Policy.

## **Acting in Good Faith**

Anyone filing a complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing there is indication of a violation. Any allegations that prove not to be substantiated, and/or which prove to have been made maliciously or knowingly to be false, will be considered a serious disciplinary offense.

## **No Retaliation**

No individual who in good faith reports a suspected violation shall suffer harassment, retaliation, or adverse consequence based on the reporting of such a violation. Anyone who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment, contract or volunteer status.

## **Reporting Suspected Violations**

Employees, volunteers, members and contractors have a right to share their questions, concerns, suggestions, or complaints with someone who can address them properly, and are encouraged to do so.

Directors and officers are required to report suspected violations of PRPS policies or relevant laws and regulations to the PRPS CEO and/or Board President.

Should an employee, director, volunteer, member or contractor believe that the process to report and/or investigate violations is inadequate, they should contact the Pennsylvania Attorney General's Office.

## **Confidentiality**

The complainant may submit violations or suspected violations confidentially or anonymously. Reports of violations or suspected violations will be kept confidential to an extent possible that is consistent with the need to conduct an adequate investigation.

## **Implementation**

Implementation of this policy includes prompt and timely attention to:

- Documenting the reported violation(s), and communicating with the complainant about the status of the investigation.
- Requesting and reviewing relevant documents, interviewing personnel, and/or requesting an auditor or legal counsel to investigate the complaint.
- Informing the Board of Directors on the progress of the investigation.
- Preparing a written record of the reported violation and its disposition, to be retained seven years.