

Portland Aquatic Club

Whistleblower Protection Policy

Version	Date Adopted/Revised	File Name
1.0	December 12, 2012	Disclosure Policy 1.0
2.0	October 24, 2015	Whistleblower Protection Policy <i>Renamed & rewritten to increase specificity clarity and actionability and utility</i>

Note: This policy has been amended to align with non-profit policy recommendations. The language below has been adapted from the National Council of Non-Profits Sample Whistleblower Protection Policy.

Purpose:

Portland Aquatic Club requires directors, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the Portland Aquatic Club, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Policy:

Reporting Responsibility

This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that the Portland Aquatic Club can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, employees and volunteers to report concerns about violations of Portland Aquatic Club's code of conduct or suspected violations of law or regulations that govern Portland Aquatic Clubs operations.

No Retaliation

It is contrary to the values of Portland Aquatic Club for anyone to retaliate against any board member, officer, employee or volunteer who in good faith reports an ethics violations, or a suspected violation of law, such as complaint of discrimination, or suspected fraud or suspected violation of any regulation governing the operations of Portland Aquatic Club. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including terminations of employment.

Reporting Procedure

Portland Aquatic Club has an open door policy and suggests that employees share their questions, concerns, suggestions or complaints with their supervisor. If you are not comfortable speaking with your supervisor (e.g. coach, pool parent, service hour lead) or you are not satisfied with your supervisor's response, you are encouraged to speak with the CEO or Chair of the Board. Reports of complaints or concerns about suspected ethical and legal violations are requested to be delivered to the CEO/Board Chair in writing, who then have the responsibility to investigate all reported complaints. The Portland Aquatic Club CEO and Board Chair shall serve as compliance officers and are responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved.

Accounting and Auditing Matters

The Portland Aquatic Club's compliance officers shall immediately notify the Finance/Budget committee of any concerns or complaint regarding accounting practices, internal controls, or auditing and work with the committee until the matter is resolved.

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Acting in Good Faith

Anyone filing a written complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. 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 offence.

Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant. 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 Portland Aquatic Club's compliance officers will notify the person who submitted complaints and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.