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### **Whistleblower Policy**

This Whistleblower Policy of the Keystone Chapter of Community Associations Institute:

1. Encourages staff and volunteers to come forward with credible information on alleged illegal practices or serious violations of adopted policies of the Organization;
2. Specifies that the Organization will protect the person from retaliation; and
3. Identifies where such information can be reported.

**Encouragement of reporting.** The Organization encourages complaints, reports or inquiries about alleged illegal practices or serious violations of the Organization's policies, including illegal or improper conduct by the Organization itself, by its leadership, staff, volunteers or by others on its behalf. Appropriate subjects to raise under this policy would include financial improprieties, accounting or audit matters, ethical violations, or other similar illegal or improper practices or policies. Other subjects on which the Organization has existing complaint mechanisms should be addressed under those mechanisms, such as raising matters of alleged discrimination or harassment via the Organization's human resources channels, unless those channels are themselves implicated in the wrongdoing. This policy is not intended to provide a means of appeal from outcomes in those other mechanisms.

**Protection from retaliation.** The Organization prohibits retaliation by or on behalf of the Organization against staff or volunteers for making good faith complaints, reports or inquiries under this policy or for participating in a review or investigation under this policy. This protection extends to those whose allegations are made in good faith but prove to be mistaken. 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.

**Where to report.** Complaints, reports or inquiries may be made under this policy on a confidential or anonymous basis. All complaints shall be in writing. They should describe in detail the specific facts demonstrating the bases for the complaints, reports or inquiries. They should be directed to the Organization's chief employed executive or Organization President; if both of those persons are implicated in the complaint, report or inquiry, it should be directed to the President-Elect of the Organization. The person receiving the complaint will report all complaints to the chapter Executive Committee, consisting of the President, President-elect, Vice President, Immediate Past President, Treasurer and Secretary. The Executive Committee will conduct a prompt, discreet, and objective review or investigation and recommend what corrective action, if any, should be taken. The executive committee shall inform the Board of Directors of all complaints, prior to the initiation of an investigation, and their resolution at the conclusion of any investigation. Staff or volunteers must recognize that the Organization may be unable to fully evaluate a vague or general complaint, report or inquiry that is made anonymously.

**Accounting & Audit Matters.** The chapter Executive Committee shall immediately notify the Finance Committee of any concerns of complaints regarding account practices, internal controls or auditing and work with the committee until the matter is resolved.

**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. The Organization reserves the right to discipline persons who make bad faith, knowingly false, or vexatious complaints, reports or inquiries or who otherwise abuse this policy.

**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 Complaints.** The Executive Committee will notify, in writing, the person who submitted a complaint 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 investigation.

Approved and Adopted by the Chapter Board on 10/20/2016.