



## **NORTH COUNTRY WORKFORCE DEVELOPMENT BOARD**

### **Whistleblower Protection Policy**

### **ADOPTED NOVEMBER 2, 2017**

The North Country Workforce Development Board (NCWDB) requires directors, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Employees and representatives of the NCWDB must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

#### **Reporting Responsibility**

This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that NCWDB 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 NCWDB's code of ethics or suspected violations of law or regulations that govern NCWDB's operations.

#### **No Retaliation**

It is contrary to the values of NCWDB for anyone to retaliate against any Board member, officer, employee or volunteer who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of NCWDB. 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.

#### **Reporting Procedure**

The NCWDB has an open-door policy and suggests that employees share their questions, concerns, suggestions or complaints with the Executive Director. If not comfortable speaking with the Executive Director, or not satisfied with the Executive Director's response, employees are encouraged to speak with the Chair of the Board of Directors or other members of the Board of Directors. The Executive Director is required to report complaints or concerns about suspected ethical and legal violations in writing to the Chair of the NCWDB's Board of Directors, who has the responsibility to investigate reported complaints. Employees with concerns or complaints may also submit their concerns in writing directly to the Executive Director.

***Adopted 11/2/2017***



## **Compliance Officer**

The NCWDB is responsible for ensuring complaints about unethical or illegal conduct are investigated and resolved. The Executive Director will act as the Compliance Officer and advise the Board of Directors of all complaints and their resolution and will report annually to the Treasurer on compliance activity relating to accounting or alleged financial improprieties.

## **Accounting and Auditing Matters**

The NCWDB's Executive Director shall immediately notify the Treasurer of any concerns or complaint regarding corporate accounting 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. 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 offense.

## **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 NCWDB's Executive Director will notify 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 the investigation.

***Adopted 11/2/2017***

