



## **Whistleblower Protection Policy**

Approved by the Board of Directors  
August 12, 2013; amended August 11, 2014

Council of State Archivists requires directors, officers, employees and contractors to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the Council of State Archivists, we must practice honesty and integrity in fulfilling our 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 Council of State Archivists 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 Council of State Archivists' policies or suspected violations of law or regulations that govern Council of State Archivists' operations.

### **No Retaliation**

It is contrary to the values of Council of State Archivists for anyone to retaliate against any board member, officer, employee, contractor 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 Council of State Archivists. 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 Council of State Archivists has an open door policy and suggests that employees or contractors share their questions, concerns, suggestions or complaints with their supervisor. If you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor's response, you are encouraged to speak with a member of the Personnel Committee. Supervisors are required to report complaints or concerns about suspected ethical and legal violations in writing to the Council of State Archivists' Personnel Committee, who has the responsibility to investigate all reported complaints.

Great care shall be taken in the investigation of suspected improprieties or wrongdoing to avoid mistaken accusations or alerting suspected individuals that an investigation is under way.

The Personnel Committee will decide the manner in which the allegation will be investigated and by whom. They shall be authorized to seek the advice of outside counsel or other parties as they may determine appropriate.

## **Personnel Committee**

The Council of State Archivists' Personnel Committee is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Personnel Committee will report to the Treasurer on compliance activity relating to accounting or alleged financial improprieties.

## **Accounting and Auditing Matters**

The Council of State Archivists' Personnel Committee shall immediately notify the Finance Committee 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 Council of State Archivists' Personnel Committee 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.