



# Whistleblower Policy

It is Surprise Lake Camp policy to expect any member of its community who has knowledge or reasonable suspicion that agency assets are being misused or that agency decisions are being made in an improper manner to report the problem. Situations in which a report should be made include, but are not limited to:

- Violation of laws in the performance of camp responsibilities, during camp working hours, or of a nature that may render the individual unfit for employment by a children's camp;
- Questionable accounting, bookkeeping, financial reporting, or adherence to internal controls;
- Suspected fraud, theft, or misappropriation of assets;
- Violation of the agency's Conflict of Interest Policy;
- Unauthorized use of agency assets for personal benefit;
- Actions that benefit individuals to the detriment of the agency;
- Retaliation or harassment in response to a report made under this policy.

Reports may be made anonymously, or the person making the report may identify himself/herself. Either way, the camp will honor a reporter's request to have his/her identity kept confidential wherever possible.

A report may be made to any Board officer or full-time staff member. Upon receiving such a report, the officer or staff member will inform the Executive Director, who in turn will inform the President. If the matter involves the agency's finances, the Treasurer will also be informed. If the President, Treasurer, or Executive Director are implicated by the report, then the next highest-ranking Board or staff member will be informed. Other Board members or staff may be informed at the discretion of the Executive Director, President, or Treasurer.

After preliminary analysis, if the matter is deemed to be insignificant and best handled without an investigation, then the team may ask the agency's professional staff to handle the matter in an appropriate manner, or even, in some cases, recommend to the reporter that he/she address the issue personally.

Otherwise, the team of informed officers/staff will conduct a thorough investigation, and will take action as needed to remedy any problems they find. They may consult with attorneys, accountants, or other professionals if, in their judgment, this is needed in order to conduct an appropriate investigation.

The agency will not tolerate any harassment or retaliation directed at any individual who makes a report under this policy. Individuals who are implicated by the report will be advised that harassment or retaliation will not be tolerated. The person who made the report will be encouraged to make an additional report if any harassment or retaliation ensues.

If the report was not anonymous, the person who made the report will be briefed about how the matter is being handled within forty-eight hours and will be given further verbal status reports at least weekly during the investigation. At the conclusion of the investigation, the person who made the report will be informed of the final result. However, nothing in this paragraph requires that any information be given to the person who made the report that might jeopardize the investigation.

If the investigation reveals that the report was founded in whole or in part, the Board of Directors will be informed and will decide what action needs to be taken. If the transgression involved is serious, including the commission of a crime, the Executive Committee may be convened prior to a full Board meeting in order to take expedited action, including notification of authorities if warranted.

If the investigation reveals that the report was unfounded, but in good faith, the investigation will be closed without further disclosure in order to protect the reputation of anyone found to be innocent. If the investigation reveals that the report was knowingly false, the person who made the report will be subject to disciplinary action.