

4.4 Whistleblower Policy

A whistleblower as defined by this policy is an employee or volunteer at the National Office of the National Council of the Society of St. Vincent de Paul who reports an activity that he/she considers to be illegal or dishonest to one or more of the parties specified in this Policy. The whistleblower is not responsible for investigating the activity or for determining fault or corrective measures; appropriate management officials are charged with these responsibilities.

Examples of illegal or dishonest activities are violations of federal, state or local laws; conflicts of interest, sexual harassment, billing for services not performed or for goods not delivered; theft of any nature, and other fraudulent financial reporting.

If an employee or volunteer at the National Office has knowledge of or a concern about illegal or dishonest or fraudulent activity, the employee or volunteer at the National Office is to contact his/her immediate supervisor or the Senior Director of Finance, Personnel and Facilities, the National Executive Director, or the National President. If appropriate action is not taken within 72 hours, the employee or volunteer at the National Office can make the complaint known to the National Council Compliance Officer. The employee or volunteer at the National Office must exercise sound judgment to avoid baseless allegations. An employee or volunteer at the National Office who intentionally files a false report of wrongdoing will be subject to discipline up to and including termination.

Whistleblower protections are provided in two important areas confidentiality and against retaliation. Insofar as possible, the confidentiality of the whistleblower will be maintained. However, identity may have to be disclosed to conduct a thorough investigation, to comply with the law and to provide accused individuals their legal rights of defense. The National Council of The Society of St. Vincent de Paul will not retaliate against a whistleblower. This includes, but is not limited to, protection from retaliation in the form of an adverse employment action such as termination, compensation decreases, or poor work assignments and threats of physical harm. Any whistleblower who believes he/she is being retaliated against must contact the Senior Director of Finance, Personnel and Facilities, the National Executive Director, or the National President immediately. If appropriate action is not taken within 72 hours the employee or volunteer at the National Office can make the complaint known to the National Council Compliance Officer who may seek advice from the Audit Committee regarding financial matters. The right of a whistleblower for protection against retaliation does not include immunity for any personal involvement in the wrongdoing being reported.

All reports of illegal and dishonest activities will be promptly submitted to National Council Executive Director who is responsible for investigating and coordinating corrective action. If the person to whom the complaint is being made is not comfortable reporting to the National Executive Director, then he or she should contact the National President in writing. The Society of St. Vincent de Paul will not investigate anonymous reports.

Employees or volunteers at the National Office with any questions regarding this policy should contact the Senior Director of Finance, Personnel and Facilities. All employees will acknowledge in writing the receipt of the current postal address, telephone number/s, fax number, and email address of the current National President and the National Council Compliance Officer as provided by the Senior Director of Finance, Personnel, and Facilities upon their employment or upon any changes in these positions or their addresses.