



### Scope

This policy applies to all individuals and registered participants associated with our organization and complaints concerning programs, services, or organization procedures.

### Policy

In keeping with ROWONTARIO's goal of maintaining the highest standards of conduct and ethics, we will investigate complaints of suspected fraudulent or dishonest use or misuse of our resources or property by staff, board members, consultants, volunteers, or registered participants. To maintain the highest standards of service, ROWONTARIO will also investigate complaints concerning its programs and services. Additionally, ROWONTARIO will not retaliate against an employee who, in good faith, raised a complaint against some practice of the organization, or of another individual or entity with whom ROWONTARIO had a business relationship, on the basis of a reasonable belief that the practice is in violation of law or a clear mandate of public policy.

We are committed to ensuring our established and implemented policies and procedures enable individuals to come forward with information on illegal practices or violations of organizational policies.

### Protection

No director, officer, employee, volunteer, or member/participant who in good faith reports suspected fraudulent or dishonest use or misuse of its resources or property or complaints concerning ROWONTARIO's programs and services shall suffer harassment, retaliation, or adverse employment or other consequence. 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. This policy is intended to encourage and enable staff, board members, consultants, volunteers, or registered participants to raise serious concerns within the organization prior to seeking resolution outside the organization. The Policy is in addition to any non-retaliation requirements contained in our human resource policies and those required by law.

*Board approved last: March 30, 2019*

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### Operational Procedures

Staff, board members, volunteers, and all our stakeholders are encouraged to report suspected fraudulent or dishonest conduct or problems with services provided, following the procedures set forth below. This policy supplements, and does not replace, any procedures required by law, regulation, or funding source requirements.

### Reporting

A person's concerns about possible fraudulent or dishonest use or misuse of resources or property, or program operation, should be reported to the Executive Director or if it involves the Executive Director, the President of the Board. If, for any reason, a person finds it difficult to report his or her concerns to this individual, they may report the concerns directly to any member of the Board of Directors. Alternatively, to facilitate reporting of suspected violations where the reporter wishes to remain anonymous, a written statement may be submitted to one of the individuals on the Board.



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### Investigation

All relevant matters, including suspected but unproved matters, will be promptly reviewed and analyzed, with documentation of the receipt, retention, investigation, and treatment of the complaint. Appropriate corrective action will be taken, if necessary, and findings may be communicated to the reporting person and their supervisor, if appropriate. Investigations may be conducted by the Executive Director, the Board, or independent persons such as auditors and/or attorneys. Investigators will endeavor to maintain and protect confidentiality, to the best of their ability as the situation allows.

This protection from retaliation is not intended to prohibit supervisors from taking action, including disciplinary action, in the usual scope of their duties and based on valid performance-related factors. Individuals making complaints must be made in good faith; employees who intentionally make false allegations are subject to disciplinary action in accordance with the organization's human resource policies.

*Last reviewed: March 30, 2019*