

# Monadnock Humane Society

## WHISTLEBLOWER POLICY

Effective April 28, 2022



*Monadnock Humane Society requires directors, employees and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of MHS, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.*

1. **Purpose:** It is the intent of MHS to adhere to all laws and regulations that apply to the organization and the purpose of this policy is to support the organization's goal of legal compliance. The support of all board members, staff & volunteers is necessary to achieve compliance with various laws and regulations. The MHS Board of Directors ("Board") has established the following Whistleblower Policy Guidelines to:
  - a. Encourage board members, staff & volunteers to come forward with credible information on illegal practices or serious violations of adopted policies of MHS
  - b. Ensure that individuals so acting in the best interests of the organization are protected from retribution or retaliation
  - c. Identify a process for reporting such information.
2. **Effective Date:** This Policy shall become effective on January 1, 2010. Amended August 28, 2018, September 24, 2019, April 28, 2022.
3. **Review & Amendment:** The Governance Committee shall be responsible for review of this policy and making recommendations for amendments. This policy shall be reviewed at least annually or whenever it becomes inconsistent with state or federal laws. Any amendments shall be written and submitted to the Board to be placed on the agenda for discussion and approval at the next Board meeting.
4. **Policy Statement**
  - a. MHS encourages complaints, reports, or inquiries about illegal practices or serious violations of MHS' adopted policies, including illegal or improper conduct by MHS' leadership or by others on MHS' behalf. Appropriate issues covered by this policy would include (but not necessarily limited to):
    - i. Financial improprieties, accounting or audit matters
    - ii. Ethical violations
    - iii. Illegal activities of any kind
    - iv. Violations of a clear mandate or public policy concerning the health, safety, welfare, or protection of the environment
    - v. Improper practices inconsistent with MHS' policies or established positions, or which demonstrate poor judgment that would jeopardize either the tax-exempt status and/or reputation of MHS
  - b. Other subjects for which MHS has existing complaint mechanisms should be addressed under those mechanisms, such as raising matters of alleged discrimination or harassment via the Executive Director unless that channel is implicated in the

- wrongdoing. In such a case, the complaint should be brought to the attention of the Board Chair. If both the Executive Director and Board Chair are implicated in the complaint, then it should be brought to the attention of the Board Vice Chair.
- c. No Retaliation: MHS prohibits retaliation by or on behalf of MHS against board members, staff or volunteers for making good faith complaints, reports or inquiries under this policy or for participating in a review or investigation under this policy.
  - d. Acting in Good Faith: Anyone filing a written complaint under this policy concerning a violation or suspected violation must be acting in good faith:
    - i. Have reasonable grounds for believing the information disclosed indicates a violation.
    - ii. 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 offense and subject to disciplinary action including termination of employment or volunteer status in the organization.

## 5. Procedure

- a. Complaints, reports or inquiries may be made in writing under this policy on a confidential or anonymous basis. They should include specific and detailed facts demonstrating the basis for the complaint, report or inquiry.
- b. Complaints, reports or inquiries should be directed in this order, based upon whether the person is implicated in the complaint:
  - i. MHS Executive Director (use MHS email address)
  - ii. MHS Chair of the Board of Directors ([boardchair@humanecommunity.org](mailto:boardchair@humanecommunity.org))
  - iii. MHS Vice Chair of the Board (use board email address)
  - iv. MHS Treasurer of the Board, MHS Secretary of the Board, any non-officer member of the Board of Directors known not to be implicated (use board email addresses)
  - v. If there is no member of MHS' leadership who is not implicated in the issue, the complaint, report or inquiry should be directed to the Registrar of Charitable Trusts, NH Department of the Attorney General ([charitabletrusts2@doj.nh.gov](mailto:charitabletrusts2@doj.nh.gov))

## 6. Review Process & Expectations

- a. A Review Committee of a minimum of 3 people, is to be comprised of the Executive Director, Board Chair or Vice Chair and at least one other Board member, depending on the nature of the complaint. Should any of the above be implicated in the complaint or inquiry they will not participate and an alternate assigned.
- b. The Review Committee will conduct a prompt, discreet, and objective review/investigation. The person making the claim must recognize that while every effort will be made to pursue all reported issues, the Review Committee may be unable to fully evaluate a vague or general complaint, report or inquiry that has insufficient evidence and/or is made anonymously.
- c. Reports and concerns shall be kept confidential to the extent possible and practical in order to complete a comprehensive investigation.
- d. The individual making the complaint shall cooperate with the investigation and should also be aware that the final results of the objective review or investigation may not be able to be shared in part or its entirety.