

		Policy Number: AG-008
Subject:	WHISTLEBLOWER POLICY	
Section:	ADMINISTRATIVE GENERAL	
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Issued by: HR Administrator	Concurred with and Approved by: Jim Burns, Director Initial: _____ Board of Directors Initial: _____	
Cross Reference:		
Distribution:	All employees of Family Focus	

PURPOSE

In keeping with the policy of maintaining the highest standards of conduct and ethics, Family Focus, Inc. will investigate any suspected fraudulent or dishonest use or misuse of Family Focus, Inc. resources or property by staff, board members, consultants, or volunteers.

PROCEDURES:

This policy is designed to address situations in which an employee suspects another employee has engaged in illegal acts or questionable conduct involving Family Focus, Inc. assets. This conduct might include outright theft (of equipment or cash), fraudulent expense reports, fraudulent timesheets, misstatement of any accounts to any manager or to Family Focus, Inc. auditors, or even an employee's conflict of interest that results in financial harm to Family Focus, Inc.. Family Focus, Inc. encourages staff to report such questionable conduct and has established a system that allows them to do so anonymously.

Making a report

If an employee suspects illegal conduct or conduct involving misuse of Family Focus, Inc. assets or in violation of the law, he or she may report it, anonymously if the employee wishes, and will be protected against any form of harassment, intimidation, discrimination, or retaliation for making such a report in good faith.

Alternatively, employees can make a report by calling either the Director or the Board Chair, whose contact information is provided to each employee on a yearly basis.

No Retaliation

An employee who has made a report of suspicious conduct and who subsequently believes he or she has been subjected to retaliation of any kind by any Family Focus, Inc. employee is directed to immediately report it to the Director.

Reports of retaliation will be investigated promptly in a manner intended to protect confidentiality as much as practicable, consistent with a full and fair investigation. The party conducting the investigation will notify the reporting employee of the results of the investigation.

Family Focus, Inc. strongly disapproves of and will not tolerate any form of retaliation against employees who report concerns in good faith regarding Family Focus, Inc. operations. Any employee who engages in such retaliation will be subject to discipline up to and including termination.

Family Focus, Inc. Reporting Procedures

The “whistleblower” procedure is intended to describe the process through which concerns about the possible misuse of Family Focus, Inc. assets are handled pursuant to Family Focus, Inc. whistleblower policy.

1. An employee makes a report of suspected misuse of Family Focus, Inc. assets by reporting in person to the Director or reporting anonymously to the board chair.
2. The report is promptly reviewed by the Director, as well as the financial officer, to determine whether the report constitutes a complaint or a non-complaint, unless one of them is allegedly involved in the misconduct, in which case the report should be reviewed by only one of them. (If both of them are alleged to be involved, the report should go directly to the board chair.)
 - A *complaint* means any report involving (i) questionable accounting, auditing, financial reporting, or internal controls; (ii) suspected fraud, theft, or improper use of company assets; (iii) a violation of Family Focus, Inc. conflict-of-interest policy that results in a financial harm to Family Focus, Inc.; or (iv) a claim of retaliation against any employee making a good-faith report regarding any of the preceding matters.
 - A *non-complaint* means a report of any other matter not involving a misuse of Family Focus, Inc. assets.
3. If the report is deemed to be a complaint, it will be promptly investigated and forwarded to the board chair. If the report is deemed to be a non-complaint, it will be referred to the Director, Supervisor or Manager for follow-up. Some non-complaints may involve serious matters and may require prompt investigation, but may nevertheless not involve misuse of Family Focus, Inc. assets.
4. Each complaint is fully investigated, documented and as far as possible handled so as to protect the privacy of the employee making the complaint. A written report of the outcome of each investigation is prepared and delivered to the board chair.
5. The board chair decides whether the report involves a matter that is material. If it is deemed material, it is reviewed by the full board of directors to take actions to resolve the situation. If the report is deemed nonmaterial, it is not reviewed by the full board of directors but is instead addressed by the board chair, as appropriate.