

**Art School of Columbia County  
Whistleblower Protection Policy**  
Adopted November 17, 2015

**1. Intent.**

The Art School of Columbia County shall endeavor to protect any Director, Officer or employee, or volunteer who provides substantial services to the Art School of Columbia County, from intimidation, bullying, harassment, discrimination or other forms of retaliation on the part of the Art School of Columbia County, or any of its Directors, Officers, employees, or volunteers, as a consequence of the good-faith filing of a report relative to possible violations of any statute, regulation, applicable ethical standard or policy or procedure of the Art School of Columbia County.

**2. Disclosure.**

If any Director, Officer, employee or volunteer reasonably believe that some policy, practice, or activity of the Art School of Columbia County, or of another individual or entity with whom the Art School of Columbia County has a substantial business relationship may violate any statute, regulation, applicable ethical standard or policy or procedure of the Art School of Columbia County, such an individual may file a confidential written report summarizing his/her concerns with the Art School of Columbia County through placing a sealed written notice marked "Whistleblower" in the Art School of Columbia County's locked postbox through the front slot. Any notice marked "Whistleblower" will be opened jointly by the Executive Director and Board President. Any such report may be submitted anonymously, but it is strongly recommended that the whistleblower—whose identity shall be safeguarded to the greatest extent possible—discloses his/her name in order to assure that his/her concern is properly investigated.

**3. Investigation & Resolution Procedures.**

The investigation of any alleged misconduct or omission governed by this policy shall be conducted in the following manner:

- a. upon receipt of a confidential written report submitted as indicated above, opened by the Executive Director and Board President together, the report shall ordinarily be forwarded to the Board Treasurer, Board President, or Executive Director, who shall be responsible for properly receiving, overseeing, investigating, assessing, rendering determinations concerning and assuring for the proper documentation and recordation of any, and all, such reports in a manner consistent with the terms of this Policy. In instances where the one of the above-named positions is him/herself a whistleblower, a subject of the whistleblower's claims or otherwise conflicted, he/she shall disclose to the Board the existence of the whistleblower's claim and that he/she has a real or potential conflict of interest. The Board shall then appoint another Director responsible for overseeing the Art School of Columbia County's response to the whistleblower's report. In all instances, as part of his/her duties, the individual responsible for coordinating the investigation of, and response to, a whistleblower concern shall confirm, and contemporaneously document, that he/she has accepted responsibilities for overseeing the Art School of Columbia County's response and that he/she possesses the knowledge and training to so act, as well as identify and address, on an ongoing basis, needs for the improvement of this Whistleblower Protection Policy;
- b. within thirty (30)-days of receipt of the written report of a whistleblower, or as soon as practicable thereafter, the Board Treasurer, Board President, or Executive Director, or designated Board member, as appropriate, shall act as follows:

- i. safeguard the confidentiality of subject whistleblower by not disclosing to other Directors, Officers employees or volunteers of the Art School of Columbia County, the existence of the alleged misconduct or omission, the underlying factual circumstances of the filing of the written report, except as needed in order to properly investigate the matter;
  - ii. conduct an appropriate investigation of the matter within approximately thirty (30)-days of receipt of the written report, or as soon as practicable thereafter;
  - iii. review the policies and procedure of the Art School of Columbia County, making particular note of the alleged misconduct or omission;
  - iv. assess, in the most confidential manner possible, the concerns of the subject whistleblower via written questionnaire and/or interview, as well as those of other Directors, Officers, employees or volunteers who may have an understanding of, or be complicit in, the alleged misconduct or omission, in order to form an informative opinion of the matter and, if necessary, potential recommendations for resolution;
  - v. prepare and submit a written report on the matter to the Board and Executive Director, together with recommendations as to resolution and a timeline for implementation of recommended actions; and,
  - vi. forward a copy of the written report to the entire Board and Executive Director.
  - vii. shall act on the written report of the Chair, or designated Officer, as appropriate, review findings and recommendation identified therein, and submit to the Board of Directors a final written assessment of the matter, recommendations as to resolution and a timeline for implementation of recommended actions; and,
- c. upon receipt of the written report of the designated Officer, the Board of Directors, at its next scheduled Regular Meeting, or a Special Meeting called for that purpose, shall consider the matter and render binding determinations as to resolution, up to, and including, the suspension or removal of any Director, Officer, employee or volunteer of the Art School of Columbia County found to have engaged in the subject misconduct or omission.

#### **5. Retaliation Protections.**

Upon filing a report of alleged violation(s) of statute, regulation or applicable ethical standard, any such Director, Officer or Employee shall be protected, directly and indirectly, from intimidation, bullying, harassment, discrimination or adverse employment consequence or action on the part of the Art School of Columbia County or any of its Directors, Officers, employees or volunteers.

#### **6. Documentation.**

The Board of Directors shall assure that the matter is properly documented in the records of the Art School of Columbia County, including minutes of the meetings of the Committee and the Board where the matter was considered and/or addressed.

#### **7. Limitations.**

This policy does not protect any Director, Officer, employee or volunteer of the Art School of Columbia County acting in bad faith; who is deliberately dishonest; and/or, who has personally garnered profit, or some other advantage, to which he/she is not legally entitled to receive.

This policy is not a vehicle to voice administrative or operational complaints or suggestions.

No Director, Officer, employee or volunteer should expect protection under this policy if he/she is complicit in the misconduct or omission that is the subject of his/her concern, unless his/her complicity is,

itself, prompted by duress or is motivated by reasonable fear of some form of intimidation, bullying, harassment, discrimination or other form of retaliation.

**8. *Publication.***

A copy of the policy shall be distributed to all Directors, Officers, employees and volunteers who provide substantial services to the Art School of Columbia County, and information about how to file a Whistleblower complaint and obtain a copy of this policy shall be posted on the Art School of Columbia County's website.