

# **Whistleblower Policy**

Camp Solomon Schechter (CSS), a 501(c)(3) Non-Profit Corporation, in accordance with their Bylaws and as directed by the CSS Board of Directors has established a set policies for the purpose of helping camp to further and fulfill its vision and mission.

## **I. Vision & Mission**

**Mission:** Camp Solomon Schechter provides a fun, safe and welcoming environment where children and young adults create their own unique Jewish community in the spirit of the Conservative movement, thereby becoming independent, caring individuals who are connected to Judaism, Israel and their local Jewish communities.

**Vision:** Camp Solomon Schechter will be the premier Jewish camping experience in the Pacific Northwest. Schechter will create programs based around nature, music, art and sport that strengthen the bonds of our Jewish communities and provide a high quality, critical Jewish intellectual, physical, emotional and social experience for its campers, staff and alumni.

## **II. Scope of this Policy**

This document is intended to provide a mechanism for the reporting of illegal activity or the misuse of camp assets while protecting the employees who make such reports from retaliation.

## **III. Definitions**

1. Board of Directors (Directors) – shall refer to the Camp Solomon Schechter Board of Directors – the governing board established by the CSS Bylaws.
2. Executive Committee – shall refer to the governing committee established to manage the business and affairs of the organization when the Board is not in session as guided by the CSS Board of Directors and outlined by the CSS Bylaws.
3. Governance Committee – shall refer to the governing committee established to administer the Bylaws, Board policies and review of Board members as guided by the CSS Board of Directors and outlined by the CSS Bylaws.
4. Executive Director – shall refer to the senior CSS administrative/executive manager, hired and appointed by the CSS Board of Directors.

## **IV. General Information**

The Governance Committee is responsible for the establishment of the CSS Whistleblower Policy. To meet this responsibility the committee will:

1. Adopt and periodically review the CSS Whistleblower Policy.
2. Define and assign the responsibilities for all involved parties.

## **V. Purpose of this Policy**

To establish a “Whistleblower Policy” that encourages CSS directors, officers and employees to report suspected waste, fraud, abuse, mismanagement and violations of law, and to prevent retaliation against those who report such occurrences in good faith. This Whistleblower Policy is further intended to encourage the reporting and resolution of such issues within CSS prior to seeking resolution outside camp.

## **VI. Questionable Conduct**

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

## **VII. Making a Report**

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

Employees and Directors can make a report to the CSS Executive Director or Board President(s) at any time. CSS will promptly conduct an investigation into matters reported, keeping the informant’s identity as confidential as possible consistent with our obligation to conduct a full and fair investigation.

Alternatively, employees and Directors can make a report by calling any member of the Executive Committee. Their names and phone numbers are posted.

## **VIII. No Retaliation**

An employee or Director 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 camp employee or Director is directed to immediately report it to the Executive Director or any member of the Executive Committee, as appropriate.

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 person of the results of the investigation.

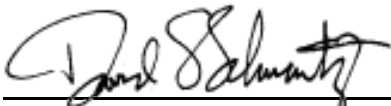
CSS strongly disapproves of and will not tolerate any form of retaliation against employees or Directors who report concerns in good faith regarding camp operations. Any employee or Director who engages in such retaliation will be subject to discipline up to and including termination.

## IX. Reporting Procedures

The “Whistleblower” procedure is intended to describe the process through which concerns about the possible misuse of camp assets are handled pursuant to CSS’s Whistleblower Policy.

1. An employee or Director makes a report of suspected misuse of camp assets by reporting, in person, to a camp executive, or reporting anonymously to a member of the Executive Committee.
2. The report is promptly reviewed by the Executive Director or Board President(s) 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 a member of the Executive Committee.)
  - 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 CSS’s conflict-of-interest policy that results in a financial harm to camp; 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 camp assets.
3. If the report is deemed to be a complaint, it will be promptly investigated and forwarded to the Board Treasurer. If the report is deemed to be a non-complaint, it will be referred to the appropriate executive or manager for follow-up. Some non-complaints may involve serious matters and may require prompt investigation, but may nevertheless not involve misuse of camp assets.
4. Each complaint is fully investigated, and as far as possible handled so as to protect the privacy of the employee or Director making the complaint. A written report of the outcome of each investigation is prepared and delivered to the Board Treasurer.
5. The Board Treasurer decides whether the report involves a matter that is material. If it is deemed material, it is reviewed by the full Board Executive Committee, which may forward it for disposition to the Board or may direct senior management to take actions to resolve the situation. If the report is deemed nonmaterial, it is not reviewed by the committee but is instead addressed by the Executive Director, as appropriate.

Approved this 23<sup>rd</sup> day of February, 2014



David Schwartz, Board Co-President



Karen Twain, Board Co-President



Sarah Glass, Board Secretary

Due for review and affirmation in February 2017.