# National Freedom of Information Coalition's Whistleblower Policy

#### General

National Freedom of Information Coalition (NFOIC) requires directors, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of NFOIC, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

### **Reporting Responsibility**

It is the responsibility of all directors, officers and employees to report ethics violations or suspected violations in accordance with this Whistleblower Policy.

#### No Retaliation

No director, officer or employee who in good faith reports an ethics violation shall suffer harassment, retaliation or adverse employment 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 Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within NFOIC prior to seeking resolution outside NFOIC.

### **Reporting Violations**

NFOIC has an open door policy and suggests that employees share their questions, concerns, suggestions or complaints with someone who can address them properly. However, if you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor's response, you have two additional options:

The University of Missouri System has a whistleblower hotline available to all NFOIC employees and volunteer workers.

Two members of the NFOIC Board of Directors, the President and the Chair of the NFOIC Audit Committee, serve as Compliance Officers and can be contacted confidentially. If an employee is not comfortable contacting either of these individuals, any member of the NFOIC Board of Directors can be contacted.

## **Acting in Good Faith**

Anyone filing a complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. 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 disciplinary offense.

## **Confidentiality**

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

## **Handling of Reported Violations**

The Compliance Officer will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

Policy Approved by the NFOIC Board of Directors on \_\_\_\_\_\_.