Whistleblowing Policy

The Boys & Girls Clubs of Greater Memphis encourages employees to report any suspected or actual activity that they believe to be illegal, unethical or inappropriate. Employees who report such activities may be known as “whistleblowers.” All employees, volunteers, directors and officers of the Club will be protected from any disadvantage caused by raising legitimate concerns and shall report suspected illegal activities within the organization.

Safeguards

Confidentiality
An individual may report a suspected violation anonymously or on a confidential basis, keeping in mind that in the course of the investigation it may become necessary to disclose this information.

Retaliation
No employee, volunteer, director or officer who in good faith reports a violation will suffer harassment, retaliation or adverse employment consequence. In addition, The Club will not retaliate against any employee, volunteer, director or officer who discloses or threatens to disclose to a supervisor or a public body, any activity, policy, or practice of the Club that the employee reasonably believes is in violation of a law, or a rule or regulation mandated by law, or is in violation of a clear mandate or public policy concerning health, safety, and welfare. The Club encourages and enables employees and others to raise serious concerns within the Organization prior to seeking resolution outside the Organization.

Any employee who retaliates against someone who has reported a violation in good faith is subject to disciplinary action up to and including termination of employment.

Malicious Allegations
An individual is not required to prove the truth of an allegation, but is required to act in good faith. Any individual who does not act in good faith in reporting a suspected violation may be subject to disciplinary action up to and including termination of employment.

Reporting Procedure

Open Door Policy
Anyone who reasonably believes that some policy, practice or activity of the Club is in violation of the law, or a clear mandate or public policy, the employee should share their questions,
concerns, suggestions, or complaints with someone who may be able to address them properly. In most cases, an employee's supervisor is in the best position to address an area of concern. However, if they are not comfortable speaking with their supervisor or are not satisfied with their supervisor’s response, they are encouraged to speak to Human Resources or anyone in management whom they are comfortable approaching. If the concerns are not addressed, the individual should make a formal complaint as outlined below.

**Formal Report of Violations**
If an individual reasonably believes that some practice of the Club, a member of the board of directors or a board committee, an employee or volunteer of the Club or another individual or entity with whom the Club has a business relationship is in violation of the law, the individual must file a written complaint with the Chief Executive Officer or Board President.

**Handling Reported Violations**
The Chief Executive Officer or Board President will contact the individual who submitted the complaint within 10 business days and acknowledge the reported violation was received. The complainant will be notified about what actions will be taken. If no further action or investigation is to follow, an explanation for the decision will be given to the complainant.

Any complainant who reasonably believes they have been retaliated against in violation of this whistle blower policy shall follow the same procedures as they did when they filed the original complaint.