

NATIONAL COALITION TO ABOLISH THE DEATH PENALTY

UPDATED 4/1/16

WHISTLEBLOWER POLICY

A. GENERAL

1. General Policy

It is the intent of the National Coalition to Abolish the Death Penalty (“NCADP”) to adhere to all laws, regulations and internal policies that apply to the organization and the underlying purpose of this Whistleblower Policy is to support the organization’s goal of legal compliance. All employees, directors and officers of the NCADP shall report suspected violations of laws, regulations, or internal policies that apply to the NCADP and will be protected from retaliation caused by raising legitimate concerns about any such suspected violations.

2. Purpose

The NCADP encourages its employees, directors and officers to maintain high ethical standards. This Whistleblower Policy is meant to provide a confidential and effective means for reporting suspected violations of laws or regulations. It further serves to protect individuals who report suspected violations from retaliation in any form.

B. SAFEGUARDS

1. 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 that the source of the complaint be identified.

2. Retaliation

No individual who reports a suspected violation in good faith, whether or not the allegations turn out to be correct, shall be subject to any form of retaliation, including harassment, demotion, or firing, by the NCADP or its employees. Anyone who retaliates against a complainant shall be subject to disciplinary action.

The NCADP will not retaliate against employees who disclose or threaten to disclose to a supervisor or a public body any activity, policy, or practice of the NCADP that the employee reasonably believes is in violation of laws, regulations or internal policies.

3. 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 subjected to disciplinary action.

C. PROCEDURE

1. Open Door Policy

If an employee reasonably believes that some policy, practice or activity of the NCADP is in violation of a law, regulation or internal policy, that employee should share his or her questions, concerns, suggestions, or complaints with his or her immediate supervisor, who may be able to address them properly. If the concerns are not addressed, the individual may make a formal complaint as outlined below.

2. Reporting Violations

If an individual reasonably believes that some practice of the NCADP, or its board of directors or a board committee, an employee of the NCADP, or another individual or entity with whom the NCADP has a business relationship is in violation of a law, regulation or internal policy, the employee must file a written complaint with the Executive Director or Board Chairperson.

3. Handling Reported Violations

The Executive Director or Board Chairperson will acknowledge the receipt of the complaint within 5 business days and promptly undertake an investigation of the complaint. Following the completion of the investigation and the preparation of a written report with the findings and conclusions of the investigation, any appropriate action will be recommended to the Board of Directors, as warranted by the investigation. The complainant will be notified about what actions the Board of Directors has decided will be taken. If no further action or investigation is to follow, an explanation for the decision will be given to the complainant. All decisions are considered final. If the complaint is resolved to the complainant's satisfaction, the complainant shall acknowledge this in writing.

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