

**Orange County Rape Crisis Center  
Whistleblower Policy  
Adopted by Board of Directors, December 5, 2006**

I. Basic Premises.

Orange County Rape Crisis Center's Code of Ethics and Conduct and other agency policies require directors, officers, employees, and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As representatives of OCRCC, we must practice honesty and integrity in fulfilling our responsibilities and complying with all applicable laws and regulations.

II. Reporting Responsibility.

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

III. No Retaliation.

No director, officer, employee or volunteer who in good faith reports a possible violation of law or agency policy shall suffer harassment, retaliation, or adverse employment consequence. Any agency representative who retaliates against someone who has reported a possible 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 OCRCC prior to seeking resolution outside the organization. Nothing in this policy precludes the reporting of possible violations of law to appropriate law enforcement agencies.

IV. Reporting Violations.

It is suggested that agency representatives share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, a direct supervisor, committee chair or board officer is in the best position to address an area of concern. If, however, someone is not comfortable speaking with those officials, it is permissible to speak with any other supervisor within the organization. Supervisors are required to report suspected violations of agency policy to the Compliance Officer, who has specific and exclusive responsibility to investigate all reported violations. In some cases, e.g., suspicion of fraud or evidence destruction, it may be appropriate to contact the Compliance Officer directly.

V. Compliance Officer.

The Board Secretary will serve as OCRCC's Compliance Officer. The Compliance Officer is responsible for investigating and resolving all reported complaints and allegations concerning violations of agency policy, and, at his or her discretion, shall

advise the Executive Director, the Assistant Director, and/or the Finance Committee, which currently serves as the Audit Committee. The Compliance Officer has direct access to the audit committee of the Board of Directors and is required to report to the audit committee at least annually on compliance activity. OCRCC's compliance officer serves as an ex officio member of the Audit Committee for purposes of compliance issues.

VI. Accounting and Auditing Matters.

The audit committee of the Board of Directors shall address all reported concerns or complaints regarding corporate accounting practices, internal controls, or auditing. The Compliance Officer shall immediately notify the audit committee of any such complaint and work with the committee until the matter is resolved.

VII. 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.

VIII. 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.

IX. 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.