

# PENNSYLVANIA EDUCATION FOR ALL COALITION, INC (PEAC)

## Whistleblower Protection Policy

Pennsylvania Education For All Coalition, Inc. (PEAC) requires board members, officers, independent contractors, volunteers and employees (when applicable) to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As representatives of PEAC, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

### Reporting Responsibility

This Whistleblower Policy is intended to encourage and enable board members, officers, independent contractors, volunteers and employees to raise serious concerns internally so that PEAC can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, independent contractors, volunteers, and employees, if applicable, to report concerns about violations or suspected violations of the bylaws and policies that govern PEAC's operations.

### No Retaliation

It is contrary to the values of PEAC for anyone to retaliate against any board member, officer, independent contractor, volunteer or employee who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of PEAC. 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. A board member, independent contractor or volunteer who retaliates against someone who has reported a violation in good faith is subject to **disassociation from** the organization.

### Reporting Procedure

PEAC has an open door policy and suggests that anyone that has a role and responsibilities with PEAC can share their questions, concerns, suggestions or complaints with any board member with whom that person feels comfortable. Board members are required to report complaints or concerns about suspected ethical and legal violations in writing to PEAC's Compliance Officer\* who has the responsibility to investigate all reported complaints.

### Compliance Officer [or other title that is appropriate for your organization]

The Compliance Officer is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Compliance Officer will advise the Board members of all complaints and their resolution and will report at least annually to PEAC's Treasurer on compliance activity relating to accounting or alleged financial improprieties.

### Accounting and Auditing Matters

PEAC's Compliance Officer shall immediately notify the Finance Committee of any concerns or complaint regarding corporate accounting practices, internal controls or auditing and work with the committee until the matter is resolved.

### **Acting in Good Faith**

Anyone filing a written 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 offense.

### **Confidentiality**

Violations or suspected violations may be submitted to the Compliance Officer on a confidential basis by the complainant. 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**

PEAC's Compliance Officer will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

**Compliance Officer:** \* Note: The Compliance Officer may be a board member, the Executive Director, or a third party designated by the organization to receive, investigate and respond to complaints.

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