

## Kairos Prison Ministry International, Inc.



### **Policy on Suspected Misconduct, Dishonesty, Fraud and Whistleblower Protection**

Kairos Prison Ministry International, Inc. is committed to the highest possible standards of ethical, moral, and legal conduct. Consistent with this commitment, this policy aims to provide an avenue for employees, volunteers or anyone else who has knowledge of an issue to raise concerns about suspected misconduct, dishonesty, or fraud and to provide reassurance that they will be protected from reprisals for whistleblowing in good faith.

#### **Safeguards**

No director, officer, or employee or other person who in good faith reports a violation shall suffer harassment, retaliation, or an 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 policy is intended to encourage and enable employees and others to raise concerns within the ministry prior to seeking resolution outside the ministry. Also, no employee shall be adversely affected because they refuse to carry out a directive which, in fact, constitutes corporate fraud, or is a violation of state or federal law.

#### **Procedure**

Employees and any other person who have a concern relating to suspected misconduct, dishonesty or fraud may make a report to the ministry.

Concerns of suspected misconduct, dishonesty, or fraud may be reported by mail, email or phone to the Treasurer of the Board of Directors or Chair of the Board of Directors or Executive Director. The complainant may report anonymously.

Complainants are encouraged to put their names on allegations because appropriate follow-up questions and investigation may not be possible unless the source is identified. Concerns expressed anonymously will be investigated, but consideration will be given to the seriousness of the issue raised, the credibility of the concern, and the likelihood of confirming the allegation.

#### **Investigation**

Following the complaint submission, the authorized person named under procedures above receiving the submission along with one or two others from the Board of Directors will investigate each matter so reported and take corrective and disciplinary actions where appropriate. The Executive Director will be involved unless they are part of the alleged misconduct.

The group investigating may enlist others, employees of the ministry; and/or outside legal, accounting, or advisors, as appropriate, to conduct an investigation of complaints. In conducting the investigation, the group will use reasonable efforts to protect the confidentiality and anonymity of the complainant.

The amount of contact between the complainant and the group investigating will depend on the nature of the issue and the clarity of information provided. Further information may be sought from the complainant unless anonymously submitted.

The complainant will receive follow-up on their concern within two weeks including an acknowledgement that the concern was received and if investigations are underway.

Subject to legal constraints, the complainant will receive information about the outcome of any investigations.

### **Document Retention**

The Treasurer, Board Chair or appropriate Secretary of the Board will retain, as a part of the records, any such complaints or concerns for a period of at least seven years.

### **Acting in Good Faith**

Anyone filing a complaint must be acting in good faith and have reasonable grounds for believing the information disclosed indicates misconduct, dishonesty, or fraud. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly false will be viewed as a serious disciplinary offense.

*Kairos Prison Ministry International, Inc. reserves the right to modify or amend this policy at any time as it may deem necessary. Approved April, 2015*