Whole Life Farm Arts & Music Foundation

SECTION 7 - WHISTLEBLOWER POLICY

Policy & Governance Handbook

Draft for Board Review and Adoption

Purpose: The Foundation encourages directors, officers, employees, contractors, volunteers, and other participants in Foundation activities to raise good-faith concerns about suspected misconduct. Reports should be taken seriously, reviewed appropriately, and protected from retaliation.

1. POLICY STATEMENT

The Foundation is committed to lawful, ethical, and responsible conduct. Individuals are encouraged to report in good faith suspected violations of law, misuse of charitable assets, financial impropriety, serious policy violations, threats to participant safety, falsification of records, or other significant misconduct connected with the Foundation.

2. WHO MAY REPORT

A concern may be raised by a director, officer, employee, independent contractor, volunteer, teaching artist, program participant, parent or guardian, vendor, donor, or other person with information about suspected misconduct involving the Foundation.

3. REPORTABLE CONCERNS

Examples include suspected fraud or theft; diversion or misuse of charitable funds; falsification of financial or corporate records; improper destruction of records; undisclosed conflicts of interest; unlawful discrimination or harassment; serious safety violations; retaliation; material violations of Foundation policies; violations of grant or donor restrictions; and other conduct reasonably believed to violate law or materially harm the Foundation or its participants.

4. GOOD-FAITH REPORTING

A person does not need proof before raising a concern. A good-faith report is one made with an honest and reasonable belief that the information may indicate misconduct. Reports that prove mistaken after review are still protected when made in good faith.

5. KNOWINGLY FALSE REPORTS

This policy does not protect a person who knowingly makes a false accusation, intentionally provides fabricated evidence, or uses the reporting process for malicious purposes. A mistaken or unsubstantiated good-faith report is not the same as a knowingly false report.

6. HOW TO REPORT

Concerns should ordinarily be reported to the President or another appropriate officer. If the concern involves the President, the report should be made to another disinterested director or officer. If the concern involves multiple officers or creates a significant governance conflict, it should be directed to a disinterested member of the Board or other person designated by the Board.

7. EMERGENCY OR IMMEDIATE SAFETY MATTERS

This policy is not a substitute for emergency services or legally required reporting. An immediate threat to life or safety should be addressed through appropriate emergency procedures. Suspected child abuse or neglect and other matters subject to mandatory reporting requirements shall be handled according to applicable law and the Foundation's Youth Protection & Child Safety Policy.

8. CONTENT OF A REPORT

A report should include, when known, the nature of the concern, relevant dates, persons involved, records or transactions involved, witnesses, and any supporting information. A report may be made even when some details are unknown.

9. CONFIDENTIALITY

The Foundation will make reasonable efforts to protect the confidentiality of a reporting person and individuals involved in a review, consistent with the need to investigate, take corrective action, comply with law, obtain professional advice, protect safety, or respond to legal process. Absolute confidentiality cannot be guaranteed.

10. ANONYMOUS REPORTS

The Foundation may consider anonymous reports. Anonymous reporting can limit the ability to ask follow-up questions or communicate the outcome, but a credible anonymous concern should not be disregarded solely because the reporter is unidentified.

11. NON-RETALIATION

The Foundation prohibits retaliation against a person who in good faith reports suspected misconduct, participates in an investigation, provides information, or refuses to participate in conduct reasonably believed to be unlawful. Retaliation may include termination, removal from duties, threats, intimidation, harassment, adverse scheduling or assignments, exclusion, or other materially adverse treatment because of protected reporting activity.

12. REPORTING RETALIATION

Suspected retaliation should be reported promptly through the same channels available for other concerns. A retaliation complaint should be reviewed independently of any person alleged to have retaliated whenever practical.

13. REVIEW AND INVESTIGATION

The person receiving a report shall determine an appropriate review process based on the seriousness, credibility, conflicts, and subject matter involved. The Foundation may involve disinterested directors, outside legal counsel, an accountant, insurer, law enforcement, child-protection authorities, or another qualified professional when appropriate.

14. FAIRNESS

A review should be conducted as objectively as reasonably possible. Persons accused of misconduct should not control the investigation of allegations against themselves. When appropriate, individuals whose conduct is questioned should have an opportunity to provide relevant information or respond to allegations.

15. CORRECTIVE ACTION

If misconduct or a significant control weakness is substantiated, the Foundation may take corrective action appropriate to the circumstances. Actions may include policy changes, financial controls, repayment or recovery efforts, discipline, termination of a relationship, removal from duties, Board action, reporting to insurers or authorities, legal action, or other reasonable measures.

16. RECORDS

Reports, investigation materials, findings, and corrective-action records shall be maintained with appropriate confidentiality and in accordance with the Record Retention & Document Destruction Policy. No relevant records shall be destroyed while an investigation, legal hold, audit, or proceeding is pending or reasonably anticipated.

17. BOARD OVERSIGHT

Significant allegations involving financial misconduct, directors or officers, threats to tax-exempt status, major safety issues, or substantial legal exposure should be reported to disinterested members of the Board as appropriate. The Board shall ensure that the matter is not controlled solely by a person implicated in the allegation.

18. NO INTERFERENCE WITH LEGAL RIGHTS

Nothing in this policy is intended to prevent a person from communicating with a government agency, law-enforcement authority, attorney, or other person when protected or required by law. Nothing requires an individual to obtain Foundation permission before making a legally protected external report.

19. POLICY DISTRIBUTION

This policy should be made reasonably available to directors, officers, employees, and regular volunteers, and may be made publicly available as part of the Foundation’s governance policies.

20. ADOPTION

This Whistleblower Policy becomes effective when approved by the Board of Directors and remains in effect until amended or replaced by the Board.

INTERNAL REPORTING INFORMATION

The Board may complete this section upon adoption and update it without changing the substantive policy.

Primary reporting contact:	_____
Role/title:	_____
Email or other reporting method:	_____
Alternate reporting contact:	_____
Role/title:	_____
Email or other reporting method:	_____

BOARD ADOPTION RECORD

Date adopted:	_____
President:	_____
Secretary:	_____
Board vote:	_____ in favor _____ opposed _____ abstained

Document status: DRAFT - not effective until formally adopted by the Board of Directors.