

Our roles, as stewards of the Girl Scouts mission, demand that we – all Board and Committee members, volunteers, and employees (henceforth to be called in this policy “volunteers and employees”) – uphold the public trust and act in an ethical manner. These ethical values include integrity, openness, honesty, accountability, fairness, respect, and responsibility.

Girl Scouts of Northern California (GSNorCal) has established a Code of Conduct which requires the highest business standards and personal behavior in all matters regarding the Council, including finance, governance, fundraising, mission operations, legal matters, equal opportunity and employment. We are committed to maintaining a positive, ethical environment for all members, volunteers, parents/caregivers, community partners, employees and supporters.

This Whistleblower Policy works in addition to and in support of GSNorCal’s Code of Conduct, Volunteer Policy, unlawful harassment and discrimination policies, “open door policy” and/or any other grievance procedure, risk and safety policy, anti-child abuse policy, and any applicable state and federal laws governing whistleblowing applicable to nonprofit and charitable organizations. Volunteers and employees are expected to comply with all applicable policies and the law.

Reporting Responsibility

GSNorCal wants to correct inappropriate conduct or actions by our volunteers and employees. Volunteers and employees are expected to report serious concerns, critical to the operations of the Council. These concerns may include, but are not limited to:

1. Suspected fraud or questionable or improper accounting or auditing matters (examples include falsifying membership registrations, grant reports, financial reports);
2. Abuse or misuse of the GSNorCal’s resources or assets;
3. Dishonest actions or deeds, including theft;
4. Suspected conflict of interest;
5. Experienced or awareness of harassment or discrimination of any kind;
6. Safety concerns, including child endangerment;
7. Violations or suspected violations of the Council’s policies; or
8. Illegal activity.

No Retaliation

A volunteer or employee who in good faith reports a concern or violation or cooperates in the investigation of such a concern will be protected from retaliation or reprisals or adverse employment or volunteer consequences. Retaliation is expressly prohibited and will be grounds for disciplinary action, up to and including termination.

Act in Good Faith

Anyone reporting a concern must act in good faith, without malice to GSNorCal or any individual associated with the Council, and who has reasonable grounds for believing that the information shared indicates that a violation has occurred. The act of making allegations that prove to have been made maliciously, or with the foreknowledge that the allegations are false, will be viewed as a serious disciplinary offense. It may also result in discipline, up to and including dismissal from the volunteer position or termination of employment.

Confidentiality

Reported concerns, and investigations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation. Disclosure of reports of concerns to individuals not involved in the investigation will be viewed as a serious disciplinary offense and may result in discipline, up to and including termination of employment or dismissal from the volunteer position.

Direct Reporting

- GSNorCal promotes “open door” communications with all our members, volunteers and employees, parents/caregivers. Regular business matters and questions related to the regular business of Girl Scouts should be reported directly to council, in particular: in the
 - For concerns of troop, service unit and program volunteers, parents, and girls, as set forth in the Volunteer Policy; or
 - Via email to: info@gsnorcal.org
- Also we want volunteers and employees to be able to openly discuss serious concerns, complaints, or violations. Violations or suspected violations should be reported and Council leadership may be directly contacted by telephone or email as follows:
 - **Employees** - report to her/his manager, the most senior staff member responsible for human resources (HR Exec), Chief Executive Officer (CEO), or if the complaint is about the HR Exec or CEO to the Audit Committee Chair.
 - **Supervisors and managers** - report to her/his Director, Senior Director, Chief Officer, HR Exec, the CEO, or if the complaint is about the CEO to the Audit Committee Chair.
 - **Volunteers** - report as set forth in the Volunteer Policy.
 - **Board and Committee members** - report to the Audit Committee Chair. If the concern is about the Audit Committee Chair, then members report to the Board President.
 - **Parents and Girl Members** - report as set forth in the Volunteer Policy.
 - **Anyone.** In addition to the above, may report to: [info@gsnorcal](mailto:info@gsnorcal.org) – and council staff will direct the concern or complaint to the appropriate staff member for handling.

Anonymous Reporting

If anyone wishes to report a violation or suspected violation anonymously, a written or oral report may be made to the Whistleblower Hotline using e-mail or voice mail. Further information about how to contact the Whistleblower Hotline is available at the GSNorCal website.

When you contact any one of the above, you can expect that:

- You will be treated with dignity and respect
- Your communication will be confidential to the extent possible
- Your concerns will be seriously addressed and, if not resolved at the time you call, you will be informed of the outcome

All reports involving a violation of law or GSNorCal policies or are treated seriously and will be fully investigated to determine the facts and resolution appropriate under the circumstances.

How to File a Grievance

All adults in our organization should first try to resolve problems by talking directly to one another in brave, respectful conversations. Guidance for having a courageous conversation is included in your *Volunteer Essentials* toolkit. If it is not possible to come to a resolution that works for everyone, a volunteer may need to file a grievance.

A grievance is a complaint that another adult's behavior is in violation of this Policy, the Girl Scout safety protocols or Culture Code and is not improving with feedback. The *GSNorCal Grievance Process* works to handle these complaints in an orderly and fair manner. To file a grievance, you should:

1. Contact the Leader Support Manager for your Service Unit. Set up a meeting to share the adult behaviors you've witnessed that are outside the Girl Scouts Culture Code for Equity & Belonging, safety policies, and/or expected behaviors. This meeting may include the person with concerning behavior if you'd like help from your Leader Support Manager to have a courageous conversation.
2. If you are not able to resolve your grievance with your Leader Support Manager for your Service Unit, then reach out to the staff member responsible for volunteers in your community. Not clear who that is? Send an email to: info@gsnorcal.org
3. If the problem you're having concerns a staff member or the staff member responsible for volunteers in your community is not able to support you to resolve your grievance, contact that person's supervisor. Not clear who that is? Send an email to: info@gsnorcal.org
4. Describe both the nature of the problem and what attempts (if any) you have already made to resolve it.
5. If an acceptable solution is still not found, you may take the issue to GSNorCal's Chief Officer who oversees membership and volunteer support. A final decision about the conflict should be made during this step. It is the Chief Officer's responsibility to ensure that any decisions or follow up steps are implemented. Not clear who that is? Send an email to: info@gsnorcal.org
6. Written documentation of the grievance along with the follow-up actions and agreements must be signed by all parties involved. A copy of this document will be kept on file by GSNorCal staff.

GSNorCal staff also are responsible for what they say and do. If you believe that a member of the GSNorCal staff has violated the standards articulated in this Policy, then you are encouraged to speak with that staff member directly to express your concern. You may want to include another staff person for support in this conversation. Working out problems directly increases trust, deepens relationships and strengthens our community. At the same time, if you are unable to have this conversation with the staff member, you may:

1. Notify the Senior Director, Membership and Volunteer Support
2. Report violations to info@gsnorcal.org, OR
3. Use GSNorCal's anonymous whistleblower hotline - the procedures are included on our website: www.gsnorcal.org (search on "whistleblower")