



**MISSOURI
CHILD CARE
RESOURCE
AND REFERRAL
NETWORK**

Whistleblower Procedures

Reporting. The whistleblowing procedure is intended to be used for serious and sensitive issues. Such concerns, including those relating to financial reporting, unethical or illegal conduct, may be reported directly to: MOCCRRN's Board Treasurer at whistleblower@mocccrrn.org or you may call 314-535-1458 x601 and leave a message for the Board Treasurer to return your call.

Timing. The earlier a concern is expressed, the easier it is to take action.

Evidence. Although the employee is not expected to prove the truth of an allegation, the employee should be able to demonstrate to the person contacted that the report is being made in good faith.

Process for Response. The action taken by MOCCRRN in response to a report of concern under this policy will depend on the nature of the concern. The Finance/Audit Oversight Committee of the MOCCRRN Board of Directors shall receive information on each report of concern and follow-up information on actions taken.

Initial inquiries will be made to determine whether an investigation is appropriate, and the form that it should take. Some concerns may be resolved without the need for investigation. The amount of contact between the complainant and the person or persons investigating the concern will depend on the nature of the issue and the clarity of information provided. Further information may be sought from or provided to the person reporting the concern



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Whistleblower Policy

This whistleblowing policy is intended to cover protections for employees and other when they raise concerns regarding MOCCRRN, regarding such as:

- incorrect financial reporting;
- unlawful activity;
- activities that are not in line with MOCCRRN policy, including the NAEYC Code of Ethical Conduct; or
- activities that otherwise amount to serious improper conduct.

Harassment or Victimization. Harassment or victimization for reporting concerns under this policy will not be tolerated. Any employee of MOCCRRN who in good faith reports incidents such as those described above will be protected from threats of retaliation, discharge, or other types of discrimination including, but not limited to, compensation or terms and conditions of employment that are directly related to the disclosure of such reports. In addition, no employee may be adversely affected because the employee refused to carry out a directive which, in fact, constitutes corporate fraud or is a violation of local/state or any other law.

Confidentiality. Every effort will be made to treat the complainant's identity with appropriate regard for confidentiality.

Anonymous Allegations. This policy encourages employees to put their names to allegations because appropriate follow-up questions and investigation may not be possible unless the source of the information is identified. Concerns expressed anonymously will be explored appropriately, but consideration will be given to:

- The seriousness of the issue raised;
- The credibility of the concern; and
- The likelihood of confirming the allegation from attributable sources.

Bad Faith Allegations. Allegations in bad faith may result in disciplinary action.

Any employee who wants to report evidence of alleged improper activity as described should contact his/her immediate supervisor, or the Executive Director. In instances where the employee is not satisfied with the supervisor or Executive Director's response, or is uncomfortable for any reason addressing such concerns to their supervisor or the Executive Director, the employee may contact any member of the MOCCRRN Board of Directors. Employees are encouraged to provide as much specific information as possible including names, dates, places, and events that took place, the employee's perception of why the incident(s) may be a violation, and what action the employee recommends. Employees who choose to identify themselves will receive a reply to their report as soon as practicable. Detailed steps for making a report are included in the Procedures portion of the Employee Handbook and posted on the MOCCRRN website.