



**VILLAGE LUTHERAN CHURCH  
(INCLUDING THE MINISTRY OF THE CHAPEL  
SCHOOL)**

**Whistleblower Policy**

**(Approved 9-15-2020)**

**BACKGROUND**

Village Lutheran Church (including the ministry of The Chapel School) (“the Corporation”) believes that positive employee relations and morale are essential to the success of the Church and School and can be best achieved and maintained in an environment that promotes ongoing open communication between supervisors, employees and volunteers, including discussions of employee/volunteer issues and concerns. We encourage employees, volunteers and others to point out problems and express their concerns and opinions on any issue, provided these expressions are made in good faith and communicated in an appropriate and professional manner. In addition, under New York law, it is required that the Corporation evidences a policy of non-intimidation, non-harassment, non-discrimination and non-retaliation for employees, volunteers or others who in good faith report any action or suspected action taken by or within the Corporation that is illegal, fraudulent or in violation of any adopted policy of the Corporation.

**POLICY**

1. No Trustee, Officer, employee, volunteer of VLC and TCS who in good faith reports any action or suspected action taken by or within the Corporation that is illegal, fraudulent or in violation of any adopted VLC and TCS policy, shall suffer intimidation, harassment, discrimination or other retaliation, or adverse employment consequences (in the case of employees).
2. The Chief Diversity Officer of VLC and TCS (as a distinct function as an employee of the corporation) is hereby designated to administer this Whistleblower Policy and to report to the Board of Trustees
3. A copy of this Whistleblower Policy shall be available on VLC and TCS’s website.

**PROCEDURE FOR REPORTING CLAIMS**

1. If you are aware of a situation that you feel may be a violation of any applicable law or regulation, VLC and TCS policies and procedures, you can report your concern in the following ways:
  - a) directly contacting VLC and TCS’s Chief Diversity Officer ([Whistleblower@VLC-NY.ORG](mailto:Whistleblower@VLC-NY.ORG)) if the complaint relates to the Chief Diversity Officer, then directly to any officer or member of the Board of Trustees;

- b) directly contacting the federal, state or local government agency with responsibility for the oversight of the program or issue in question.
2. All reports made to VLC and TCS shall be kept strictly confidential.
3. The Administration, in consultation with the Chief Diversity Officer, shall provide training to its staff and VLC and TCS's officers and Board members about best practices for handling confidential information relating to whistleblower claims made pursuant to this Whistleblower Policy.
4. All whistleblower reports shall be strictly on a "need to know basis" and will only be shared with the Chief Diversity Officer and the Executive Committee of the Board of Trustees, whenever practicable.
5. All questions and concerns (claims) will be acknowledged promptly and be investigated, with a summary fact-finding report that would, thereafter, be disclosed to the Executive Committee (and/or the Chief Diversity Officer if the claim was made to an Officer or Board Member). Any concerns that are substantiated will be addressed and corrective action taken to resolve any problems.
6. If you believe you are experiencing intimidation, harassment, discrimination or other retaliation as a result of reporting a concern, immediately report the situation to the Chief Diversity Officer. Examples of intimidation, harassment, discrimination or other retaliation may include, but are not limited to, termination of your employment, suspension, demotion, unjustified negative performance reviews, harassment, or exclusion from meetings or social activities.
7. The Chief Diversity Officer will oversee investigation of all complaints of intimidation, harassment, discrimination or other retaliation. Intimidation, harassment, discrimination or other retaliation against anyone who has raised a concern or reported a violation of the Corporation's Code of Conduct will be subject to disciplinary action, including possible termination.

## **GENERAL MATTERS**

1. Personal confessions of wrongdoing cannot be used to avoid disciplinary action but may be taken into account when determining an appropriate response.
2. The Chief Diversity Officer will refer any matter in which it determines that an act of intimidation, harassment, discrimination or other retaliation has occurred to the Trustee Board for appropriate action.
3. The Trustee Board will cause appropriate disciplinary action to be taken against anyone found to have intimidated, harassed, discriminated or otherwise retaliated against anyone who reports a concern or question as outlined above, up to and including termination.
4. The Trustee Board and the Chief Diversity Officer shall ensure that anyone making a report or filing a complaint in good faith shall be protected from acts of intimidation, harassment, discrimination or other retaliation.