

Minnesota Music Educators Association Whistleblower Policy

Approved by the Board of Directors January 11, 2008

General

Minnesota Music Educators Association (MMEA) Code of Conduct, Confidentiality and Conflict of Interest (“Code”) requires directors and officers to observe high standards of personal and professional ethics in the conduct of their duties and responsibilities. MMEA’s Personnel Handbook includes a Code of Conduct (“Code”) which applies to employees who are not officers of the organization. As representatives of MMEA, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Reporting Responsibilities

No director, officer or employee who in good faith reports a violation of the Code shall suffer harassment, retaliation or 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 Whistleblower Policy is intended to encourage and enable employees, officers and directors to raise serious concerns within MMEA prior to seeking resolution outside of MMEA.

Reporting Violations

The Code addresses the Organization’s open door policy and suggests that employees, officers and directors share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, an employee’s supervisor is in the best position to address an area of concern. However, if you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor’s response, you are encouraged to speak with the Compliance Officer or another member of the Executive Committee. Supervisors are required to report suspected violations of the Code of Conduct to MMEA’s Compliance Officer, who has specific and exclusive responsibility to investigate all reported violations. For suspected fraud, or when you are not satisfied or uncomfortable with following MMEA’s open door policy, individuals should contact MMEA’s Compliance Officer directly.

Compliance Officer

MMEA’s Compliance Officer is the Past President and Treasurer of the Board. The Compliance Officer is responsible for investigating and resolving all reported complaints and allegations concerning violations of the Code and, at his discretion, shall advise the Audit Committee. The Compliance Officer is required to report to the Audit Committee at least annually on compliance activity. MMEA’s Compliance Officer is the chair of the Audit Committee.

Accounting and Auditing Matters

The Audit Committee of the Board of Directors shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The Compliance Officer shall immediately notify the Audit Committee of any such complaint and work with the committee until the matter is resolved.

Acting in Good Faith

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

Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Handling of Reported Violations

The Compliance Office will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

Source, National Council of Nonprofit Associations, www.ncna.org
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