

UUA Whistleblower Policy

The Unitarian Universalist Association (UUA) is committed to lawful and ethical behavior in all of its activities, and requires trustees, employees, and volunteers (including committee members) to act in accordance with all applicable laws, regulations, and policies, and to observe high standards of business and personal ethics in the conduct of their duties.

The objectives of the UUA's Whistleblower Policy are to:

- prevent or detect and correct improper activities
- encourage each UUA trustee, employee, volunteer, vendor, or other person (a "Reporting Individual") to report what he or she in good faith believes to be a serious violation of law or policy or a material accounting irregularity (a "Concern")
- ensure the receipt, documentation, and resolution of reports received under this policy
- protect Reporting Individuals from retaliation.

The President may delegate any responsibility described in this policy. The President shall assure that all trustees, employees, and volunteers are informed of this policy.

Reporting Responsibility

Each Reporting Individual has an obligation to report a Concern committed by the UUA or by an officer, trustee, employee, volunteer, agent, or other representative of the UUA. The types of Concerns that should be reported include, for purposes of illustration and without being limited to, the following:

- providing false or misleading information on the UUA's financial documents, grant reports, tax returns, or other public documents;
- providing false information to or withholding material information from the UUA's staff, auditors, accountants, lawyers, trustees, or other representatives responsible for ensuring UUA compliance with fiscal and legal responsibilities;
- embezzlement, use for private benefit, or misappropriation of UUA funds;
- material violation of a UUA policy, including, among others, confidentiality, conflict of interest, sexual harassment or misconduct, whistleblower, ethics, board code of conduct regarding interpersonal relationships, and document retention;
- material failure of the UUA to take an action needed to bring the Association into compliance with law or policy;
- discrimination based on race, color, national origin, religion, age, gender identity, sexual orientation, or disability;
- facilitation or concealment of any of the above or similar actions

Reporting of Concerns

Whenever possible, a UUA employee should seek to resolve a Concern through normal grievance procedures, by reporting it to the appropriate managers until the Concern is satisfactorily resolved. However, if for any reason an employee is not comfortable speaking to a manager or does not believe the Concern is being addressed in an appropriate, timely, and ethical manner, the employee may contact the Director of Human Resources or may report the Concern to the President through the Whistleblower Reporting System.

Trustees, committee members, and other Reporting Individuals should report Concerns to the President through the Whistleblower Reporting System.

Whistleblower Reporting System

The President shall implement a system (the "Whistleblower Reporting System") to facilitate the reporting, recording, and timely resolution of Concerns. The system shall include appropriate safeguards to ensure

that concerns are properly recorded and impartially investigated. The system shall inform the Moderator about the filing of each Concern. However, if the Moderator is the subject of a Concern the chair of the UUA Audit Committee will be informed instead.

Form of Reports

Written reports of Concerns are preferred, but verbal reports will be accepted if a Reporting Individual is uncomfortable putting a Concern into writing.

Concerns about Actions of Ministers

A Concern that is reported about an action of a minister in fellowship with the UUA shall be treated as follows:

- If the Concern is about an action that was taken in the role of UUA trustee, employee, or volunteer, the President shall enter the Concern in the Whistleblower Reporting system, shall investigate the concern, and shall take appropriate disciplinary or corrective action.

If the President takes disciplinary or other corrective action against a minister, a note about the Concern and its resolution shall be placed in the minister's file.

If the President concludes that the Concern raises a question of possible unprofessional or unbecoming conduct of a minister, or other violation of the Rules of Fellowship, the President shall refer the Concern to the Ministerial Fellowship Committee.

- If the Concern is about an action that was not taken in a role of UUA trustee, employee, or volunteer, the President shall not enter the Concern in the Whistleblower Reporting System, but shall inform the Reporting Individual of the procedure for bringing the Concern to the Ministerial Fellowship Committee.

Handling of Reports

All reports of Concerns shall be investigated with due care and promptness, to determine if the allegations are true, if the issue is material, and what actions, if any, are necessary to correct the problem. The chair of the UUA Audit Committee shall immediately be notified upon the receipt of a report of a Concern regarding fraud, accounting practices, internal controls, or auditing.

At the conclusion of the investigation, the President shall issue a confidential report to the Audit Committee and to the Moderator.

Authority of Audit Committee

At the request of the Moderator, the Audit Committee may conduct further investigation of a Concern. In such cases, the Audit Committee shall have full authority to investigate the Concern, and may retain outside legal counsel, accountants, private investigators, or any other resource that the Committee reasonably believes is necessary to conduct a complete investigation of the Concern.

Notification

The person about whom a Concern is raised shall be notified of the Concern and, in the discretion of the President, the identity of the Reporting Individual at the earliest time that does not compromise the investigation of the Concern. The Reporting Individual shall be kept informed as reasonable, in the discretion of the President, throughout the investigation and resolution of the Concern.

No Retaliation

This Whistleblower Policy is intended to encourage and enable Reporting Individuals to raise Concerns for investigation and appropriate action. With this goal in mind, no one who, in good faith, reports a Concern shall be threatened, discriminated against, or otherwise made subject to retaliation (including, in the case of an employee, adverse employment consequences) as a result of such report. Moreover, a trustee, employee, or volunteer who retaliates against someone who has reported a Concern in good faith is subject to discipline up to and including removal from the Board of Trustees, dismissal from the volunteer position, or termination of employment.

Acting in Good Faith

A Reporting Individual must act in good faith and have reasonable grounds for believing the matter raised is a serious Concern. The act of making an allegation that proves to be unsubstantiated, and that proves to have been made maliciously, recklessly, with gross negligence, or with the foreknowledge that the allegation is false, will be viewed as a serious offense and may result in discipline, up to and including removal from the Board of Trustees, dismissal from the volunteer position, or termination of employment. Depending on the circumstances, such conduct may also give rise to civil or criminal liability.

Confidentiality

Reports and investigations of Concerns shall be kept confidential to the greatest extent possible. However, consistent with the need to conduct an adequate investigation and to implement a resolution, the UUA does not guarantee confidentiality. All discussions of Concerns at meetings of the Audit Committee or of the Board of Trustees shall be held in executive session.

Disclosure (by trustees, employees, volunteers, or others involved with the investigation) of information regarding individuals related to an investigation to persons not involved in the investigation or necessary to the resolution of the investigation will be viewed as a serious offense and may result in discipline, up to and including removal from the Board of Trustees, dismissal from the volunteer position, or termination of employment. Depending on the circumstances, such conduct may also give rise to civil or criminal liability.

Concerns about Elected Officials

If an investigation of a Concern concludes that a serious violation has been committed by a member of the Board of Trustees or by a member of a committee or other body elected by General Assembly, the President shall refer the matter to the Board of Trustees. The Board of Trustees shall consider the issue and shall take appropriate disciplinary measures, up to and including removal from the Board or elected body.