

PUBLIC RELEASE

growingSTEMS Whistleblower Protection Policy

Purpose

This grievance and investigation policy was created to clearly outline the expectations of the organization regarding the treatment of whistleblowers. The Sarbanes-Oxley Act of 2002 prohibits a charitable organization from retaliating against a whistleblower who provides information on certain financial crimes delineated under federal law. This whistleblower policy is intended to encourage and enable employees and others to raise serious concerns internally so that growingSTEMS can address and correct inappropriate conduct and actions.

Applicability

This policy applies to all growingSTEMS program participants, mentors, volunteers, and directors, colloquially referred to as members. It is the responsibility of all members to report concerns about violations of the growingSTEMS code of ethics or suspected violations of law or regulations that govern growingSTEMS operations.

Compliance Officer

The growingSTEMS Compliance Officer is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved.

The Compliance Officer will advise the Board of Directors of all complaints and their resolution and will report at least annually to the Finance Committee on compliance activity relating to accounting or alleged financial improprieties.

The position of Compliance Officer must not be held by any member of the Finance Committee. The Board of Directors will appoint the Compliance Officer as a normal action of the Board.

Reporting Process

growingSTEMS suggests that all members share their questions, concerns, suggestions or complaints with their program mentor. The aim to remedy concerns at the lowest level, if at all possible. If you are not comfortable speaking with the program mentor, or you are not satisfied with your mentor's response, you are encouraged to speak with the Executive Director or a board member.

Program leads are required to report complaints or concerns about suspected ethical and legal

violations in writing to the growingSTEMS Compliance Officer, who has the responsibility to investigate all complaints.

Members with concerns or complaints may also submit their concerns in writing directly to the Compliance Officer or, in instances where the Compliance Officer is not an available or not an appropriate point of contact, the Executive Director.

Investigation Process

The Compliance Officer will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation.

The Compliance Officer must work with an investigation team comprising no fewer than two (2) but no greater than four (4) additional individuals to investigate the complaint. The investigation team, excluding the Executive Director, must contain individuals from at least two (2) of the four (4) categories. No single individual can satisfy more than one (1) category requirement.

- Program mentor
- Board of Directors representative
- Parent or adult program participant
- External representative

The investigation must be allowed seventy-two (72) hours to complete and must begin no later than forty-eight (48) hours after the complaint is received. The intent is that the investigation commences and concludes within a reasonable period. Deviation from this timeline must be reported to the Board of Directors.

The investigation team must be permitted the freedom to investigate the complaint as they deem appropriate and without outside interference.

The Compliance Officer must immediately notify the Finance Committee of any concerns or complaints regarding corporate accounting practices, internal controls, or auditing, and work with the committee until the matter is resolved.

The investigation team, under the guidance of the Compliance Officer, must develop a written report of the findings and recommendations for action. The entire investigation team must fully agree upon and support the contents of the investigation report.

Reporting and Remediation Process

The report developed by the investigation team will be delivered to the Finance Committee, the Executive Director, and the Board of Directors.

The Executive Director and the Finance Committee have the responsibility of ensuring that any deficiencies or violations of the growingSTEMS policy are addressed.

Any identified violations of law must be immediately addressed. The Board of Directors and the Finance Committee must be immediately notified.

Protection

It is contrary to the values of growingSTEMS for anyone to retaliate against any member who, in good faith, reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, suspected fraud, or suspected violation of any regulation governing the operations of growingSTEMS. A member who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of affiliation with the organization.

Anyone filing a written complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. 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.

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

Violations

Deviation from this approved policy must be referred to the Board of Directors.

Effective Date

This document is effective immediately upon the approval of the document by the growingSTEMS Board of Directors.

Cancellation

This guidance is canceled upon approval of an updated document by the growingSTEMS Board of Directors.

[Return to the policy index](#)

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