

**California Creativity Association
Whistleblower
Policy**

Version 1.1

Effective: August 11, 2018

Purpose of the policy

California Creativity Association, DBA California Destination Imagination (CalDI), is a nonprofit tax exempt organization whose primary function is at all times to serve the best interests of its constituency, consistent with its Mission Statement. CalDI's mission can only be realized with an atmosphere of fairness and encouragement, free from negativity, discrimination and disparagement. This policy has been developed to ensure the CalDI program continues to be run ethically.

Policy statement

It is the obligation of anyone administering or participating in CalDI or its programs who witnesses a violation of the Code of Conduct found on the Destination Imagination website, Code of Ethics Policy, Anti-discrimination Policy, Conflict of Interest Policy and/or any of CalDI's values to report it. Anyone reporting a violation in good faith is guaranteed confidentiality and non-retaliation. Instructions on how and to whom to report violations are delineated in the detailed policy statement.

Definitions

Regional Director Person(s) in charge of administering the CalDI Program in one of California's CalDI regions.

Executive Director Person in charge of administering the DI Program in California

Violation An act in direct conflict with the Code of Conduct found on the Destination Imagination website, Code of Ethics Policy, Anti-discrimination Policy, Conflict of Interest Policy and/or any of CalDI's values.

Audit Committee A Board appointed committee to address financial matters.

Detailed policy statement

General

CalDI requires directors, officers and staff to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. All volunteers and representatives of CalDI must act honestly and with integrity in fulfilling their responsibilities and must comply with all applicable laws and regulations. Furthermore, all volunteers must sign annually the Code of Conduct located on the Destination Imagination website.

Reporting Responsibility

It is the responsibility of all directors, officers, and staff to comply with the standards outlined in the Policy statement and to report violations or suspected violations in accordance with this Whistleblower Policy.

No Retaliation

No director, officer, staff or volunteer who in good faith reports a violation shall suffer harassment, retaliation or an adverse volunteer service consequence. This Whistleblower Policy is intended to encourage and enable directors, officers, staff and volunteers, as well as others, to raise serious concerns within CalDI.

Compliance Officer

CalDI's Compliance Officer is the Vice Chair of the Board of Directors.

The Compliance Officer is responsible for investigating and resolving all reported complaints and allegations concerning violations. At his/her discretion, the Compliance Officer shall advise the Executive Director and/or the Chair of the Board of Directors of any complaint or allegation. The Compliance Officer must have direct access to the Chair of the Board of Directors and is required to report any violation to the Chair of the Board of Directors, or Board as a whole if Chair is unavailable, as soon as possible but within 2 weeks at the latest.

Reporting Violations

CalDI has an open door policy and suggests that directors, officers, staff and volunteers share their questions, concerns, suggestions or complaints with someone with whom they are comfortable and who can address their concerns properly. Suggestions for an appropriate person to contact include Regional Directors at the Regional level or the Executive Director or anyone on the Board of Directors at the Affiliate level. Those who receive reports are required to in turn report suspected violations to CalDI's Compliance Officer, or the Chair of the Board when appropriate, who has responsibility to investigate all reported violations. When not satisfied or comfortable with following the above reporting directions, individuals may contact the CalDI's Compliance Officer directly.

Accounting and Auditing Matters

The Chair 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 must be acting in good faith and have responsible grounds for believing the information disclosed indicates a violation occurred.

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 Officer 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.

Applicability and Compliance

This policy is intended to cover anyone involved in CalDI or its programs, whether Board Member, staff, volunteer or one of its constituents.

Anyone who retaliates against someone who has reported a violation in good faith is subject to discipline ranging from counseling up to and including termination of position.

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 violation or serious disciplinary offense and will be dealt with as such.

Contact for policy interpretation, help, and problem resolution

Vice Chair of Board of Directors (Compliance Officer)

Implementation procedures

This policy is already in effect and will continue to be enforced.

Related policies and references for further information

1. [Code of Ethics Policy](#)
2. [Antidiscrimination Policy](#)
3. [Board Conflict of Interest Policy and Procedures](#)
4. *The DII Code of Conduct* is the one we use and it is in [here](#).
5. *CalDI's Values*

Revision History

Version	Date	Changes
1.0	unknown	Initial release
1.0	July 17, 2011	Document reviewed, no update required
1.1	August 11, 2018	Approved by California Creativity Board. Reformatted to policy template. Minor text changes. Added definitions, violations, Compliance Officer. Added references, including DII Code of Conduct. Renamed file.