

# The Troth Whistleblower Protection Policy

## 1. Purpose

This policy is intended to encourage and enable good-faith reporting of serious concerns so that The Troth can respond promptly, fairly, and responsibly. It exists to protect those who report suspected wrongdoing, support proper review of those concerns, and help ensure that violations of law, policy, organizational trust, or governance integrity are not ignored, concealed, or mishandled.

This policy shall be read together with the Bylaws and all other duly adopted policies and procedures of The Troth.

## 2. What May Be Reported

- suspected violations of The Troth's Bylaws, Codes of Conduct, or other adopted policies or procedures;
- suspected fraud, theft, embezzlement, financial impropriety, or misuse of organizational assets;
- retaliation against a person who made a good-faith report, good-faith conflict disclosure, request for review, or participated in an investigation or governance process;
- abuse of office, misuse of authority, selective enforcement, concealment of misconduct, or interference with governance;
- conduct creating a serious risk to member safety, especially where a minor or vulnerable person may be affected;
- efforts to obstruct, manipulate, or improperly influence an investigation, adjudication, recusal determination, governance review, or other official Troth process.

## 3. Good-Faith Reporting

Any person making a report under this policy must do so in good faith and have reasonable grounds to believe the information disclosed indicates a possible violation or serious concern. A report need not ultimately be substantiated in order to be made in good faith.

Knowingly false, malicious, retaliatory, or bad-faith reports are not protected by this policy and may themselves constitute grounds for action under the Bylaws and applicable Troth policies and procedures.

#### **4. Non-Retaliation**

Retaliation against any person for making a good-faith report, making a good-faith conflict disclosure, requesting review of a possible conflict, raising a good-faith concern, seeking guidance, participating in an investigation, providing evidence, or taking part in governance related to a reported concern is prohibited.

Retaliation includes, but is not limited to, intimidation, threats, selective enforcement, exclusion from ordinary participation, removal of responsibilities for retaliatory reasons, public shaming, misuse of moderation or leadership powers, or any adverse action taken because a person raised or assisted with a good-faith concern.

Retaliation may constitute grounds for action under the Bylaws and applicable Troth policies and procedures, including the Leadership Code of Conduct, the Conflict of Interest Policy, the Procedure for the Investigation and Adjudication of Conduct Violations, and, where office-holding and institutional trust are materially implicated, the Procedure for Votes of No Confidence.

#### **5. Reporting Channels**

##### **A. Associate President**

The Associate President is the primary Officer responsible for receiving reports and initiating or coordinating the appropriate investigative response for matters involving suspected conduct violations, retaliation, abuse of office, or violations of Troth policy or procedure.

##### **B. Secretary**

The Secretary is the primary Officer responsible for maintaining the official record of the report, investigation, evidence, and procedural steps taken.

##### **C. Direct Report to the Board of Directors**

A report may be made directly to the Board of Directors when:

- the Associate President has an actual, potential, or perceived conflict of interest;
- the Secretary has an actual, potential, or perceived conflict of interest;

- the concern involves a Director, the President, the Associate President, or the Secretary;
- the concern involves accounting, financial controls, auditing, fraud, or misuse of organizational funds or property;
- the concern involves a minor, a vulnerable person, immediate safety risk, or another matter requiring urgent escalation;
- the reporter reasonably believes ordinary reporting channels cannot be used safely, fairly, or impartially.

## **6. Intake and Acknowledgment**

Reports should be made in writing where reasonably possible, though an initial oral report may be accepted and then documented.

The receiving Officer or Director shall acknowledge receipt of the report within a reasonable time and shall document the date, nature of the concern, and reporting channel used.

Where the report is first received by the Associate President, the Secretary shall be notified for recordkeeping unless doing so would create a conflict of interest or compromise safety, confidentiality, or fairness. Where the report is first received by the Secretary, the Associate President shall be notified for investigation unless doing so would create a conflict of interest or compromise safety, confidentiality, or fairness. In conflict cases, the Board shall designate alternate personnel.

## **7. Confidentiality**

Reports of violations or suspected violations may be made on a confidential basis. The Troth shall protect the identity of the reporting person and the confidentiality of the matter to the greatest extent reasonably possible, consistent with the need to assess, investigate, respond to, and resolve the concern fairly and responsibly.

Confidentiality may be limited where disclosure is reasonably necessary for safety, legal compliance, financial review, fair investigation, adjudication, appeal, recusal review, or other legitimate governance need. The Troth will not promise absolute anonymity in circumstances where that would be unrealistic or unfair, but it will limit disclosure on a need-to-know basis.

## **8. Investigation and Referral**

Reports that allege conduct violations shall be handled under The Troth's Procedure for the Investigation and Adjudication of Conduct Violations, including its provisions concerning recusal, evidence gathering, panel review, Board consideration, and appeal.

Reports that primarily involve interpersonal conflict without an alleged policy or Code violation may be referred to the appropriate conflict resolution process instead.

Reports involving accounting, internal controls, auditing, suspected fraud, or financial impropriety shall be reported promptly to the Board of Directors, and the Treasurer and any appropriate Board-designated reviewers shall assist as needed, subject to conflict-of-interest safeguards.

Reports involving serious loss of institutional trust in an Officer or Director, where the issue is not primarily whether a rule was broken but whether confidence in office can be maintained, may also be considered under the Procedure for Votes of No Confidence, as appropriate.

## **9. Conflicts of Interest and Recusal**

Any person receiving, documenting, investigating, reviewing, adjudicating, or otherwise participating in the handling of a report under this policy must disclose any actual, potential, or perceived conflict of interest related to the matter.

A person with a conflict shall recuse unless the disinterested persons responsible for the matter determine that the interest is too remote or insubstantial to require recusal.

A conflict may exist where a person has prior involvement in the matter, a material personal relationship with any party, a financial interest, divided loyalty, factional entanglement, or any other circumstance that would reasonably call their impartiality into question.

When a conflict exists, the Board shall appoint an alternate investigator, recordkeeper, reviewer, or other appropriate substitute to ensure the matter is handled fairly.

This section shall be interpreted consistently with The Troth Conflict of Interest Policy.

## **10. Protection of the Reporting Person**

No person shall be discouraged from making a good-faith report by being told that doing so is disloyal, disruptive, unfrithful, or harmful to the organization's image. The Troth recognizes that reporting serious concerns is often an act of responsibility to the community.

Leaders in particular must not use office, status, moderation authority, social influence, access to confidential processes, or procedural control to silence, punish, or discredit a reporting person acting in good faith.

## **11. Documentation and Records**

The Secretary, or a Board-appointed alternate in cases of conflict, shall maintain a confidential case file for each whistleblower report. The file shall include the report, acknowledgment, evidence received, procedural actions taken, recusal disclosures and determinations, findings, and final resolution.

Access to such records shall be limited to those with a legitimate need to know in order to carry out investigation, review, adjudication, appeal, recusal determination, safety response, legal compliance, or financial oversight.

## **12. Scope of Protection**

This policy protects good-faith reporting whether the concern is substantiated, partially substantiated, or unsubstantiated after review or investigation. It does not require that the reporting person ultimately be correct. It requires only that they act honestly and with reasonable grounds.

This policy also protects persons who cooperate in good faith with an investigation, provide evidence, answer questions, make a good-faith conflict disclosure, request review of a possible conflict, or decline to conceal relevant information.

## **13. Administration**

The Board of Directors shall oversee this policy and may adopt forms, reporting guidance, and implementing procedures consistent with it.

This policy shall be administered in a manner consistent with fairness, confidentiality, due process, non-retaliation, conflict disclosure, recusal where required, and the democratic governance of The Troth. It exists to protect the integrity, safety, impartiality, and proper functioning of the organization and to ensure that concerns can be raised without fear.