

# Procedures for Notification and Investigation of Reports of Illegal or Dishonest Activity Under WSBA's Whistleblower Policy

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*(Adopted by the BOG Personnel and Budget and Audit Committees effective June 15, 2005)*

## **NOTICE**

1. Upon receipt of a report of illegal or dishonest activity (“whistleblower report”) to a supervisor or the Human Resources Director from any WSBA staff member, the Executive Director shall be notified immediately unless the report involves the Executive Director.
2. If the report involves the Executive Director, the Chair of the Board of Governors’ (BOG) Personnel Committee shall be notified immediately by the supervisor or Human Resources Director if not previously reported directly by the whistleblower to the Chair of the BOG Personnel Committee.
3. Upon receipt of a report of illegal or dishonest activity to the BOG Personnel Committee from any WSBA staff member, the Committee shall determine whether and how to notify the Executive Director.

## **INVESTIGATION**

1. Within 5 days of receiving a whistleblower report from any sources, The Executive Director is responsible to develop a plan for a full investigation. In the event the Executive Director is the subject of the whistleblower report the chair of the BOG Personnel Committee is responsible to develop a plan for a full investigation.

The plan for full investigation shall be approved by the BOG Personnel Committee and will include:

- a. A summary of the allegation(s)
- b. Information needed to respond to the report.
- c. A preliminary list of persons to be interviewed.
- d. Whether outside auditors or investigators appear to be needed.
- e. The role of the Executive Director and/or other staff.
- f. The role of the BOG Personnel Committee.
- g. The role of the Board of Governors.
- h. Timeline for the investigation.

2. The Executive Director (or the Chair of the BOG Personnel Committee) is responsible to insure compliance with the investigation plan and shall keep the BOG Personnel Committee apprised of all progress and any significant findings.
3. The BOG Personnel Committee may, depending on the nature of the report, recommend to the BOG that they assign a Governor to work with the Executive Director (or Chair of the BOG Personnel Committee) on the investigation.

### **CLOSURE**

1. The investigators shall develop a report with recommendation that includes a written summary of the allegations and facts.
2. The investigation report shall be directed to the relevant persons as designated in the investigation plan.
3. The Executive Director shall develop a response and/or action plan to address any recommendations as well as remedial action and discipline as appropriate.
4. The original report, investigation report, and Executive Director's response shall be shared with the Board of Governors in Executive Session.
5. An appropriate response shall be shared with the person who filed the original report.
6. A formal record of the report and all follow-up action shall be maintained in a sealed envelope showing only the date and nature of the report for six years.