



29 British American Boulevard, 2nd Floor
Latham, NY 12110
518-439-8311
thearcny.org

Whistleblower Policy

Category: General Policies Effective Date: 1/2021
Department: Human Resources Last Revision Date: 2/2/21

Note: This policy must be distributed to all directors, officers, employees, and volunteers who “provide substantial services” to the State Office. Distribution for these purposes may include posting the policy on The Arc of New York’s website or at The Arc of New York’s office in a conspicuous location accessible to employees and volunteers.

The Arc New York requires directors, officers, employees, and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of The Arc New York, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws, regulations, policies and procedures.

Reporting Responsibility

This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that The Arc New York can address and correct inappropriate conduct. It is the responsibility of all board members, officers, employees, and volunteers to report concerns about violations of The Arc New York’s code of ethics, policies and procedures, or suspected violations of law or regulations that govern The Arc New York’s operations.

No Retaliation

No director, officer, employee, or volunteer of The Arc New York who in good faith reports any action or suspected action taken by or within The Arc New York that is illegal, fraudulent, or in violation of any adopted policy of the corporation shall suffer intimidation, harassment, discrimination or other retaliation, or in the case of employees, adverse employment consequence.

Reporting Procedure

The Arc New York has an open-door policy and encourages employees to share their questions, concerns, suggestions, or complaints with their supervisor. If you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor’s response, you are encouraged to speak with the Compliance Officer (CO) and/or Chief Executive Officer (CEO). Supervisors and managers are required to report complaints or concerns about suspected ethical and/or legal violations in writing to The Arc New York’s CO, who has the responsibility to investigate all reported complaints. Employees, directors, officers, and volunteers with concerns or complaints may also submit their concerns in writing directly to their supervisor, the CO and/or the CEO. Further, The Arc New York has established a confidential telephone number to receive concerns/complaints. That number is:

(518) 860-1256



29 British American Boulevard, 2nd Floor
Latham, NY 12110
518-439-8311
thearcny.org

Whistleblower Policy

Category: General Policies Effective Date: 1/2021
Department: Human Resources Last Revision Date: 2/2/21

Confidentiality Any employee, director, officer, or volunteer may make reports pursuant to this policy confidentially or anonymously. The identity of a whistleblower will be kept confidential and only disclosed with the consent of the whistleblower or when extraordinary circumstances exist. In the latter case, the decision to disclose the identity of whistleblowers rests with the Arc New York's CO.

All investigations of reported matters will be conducted in a confidential manner, so that information will be disclosed only as needed to facilitate review of the investigation or otherwise as required by law.

Compliance Officer

The Arc New York's CO is responsible for ensuring that all compliance complaints related to violations of law, regulation, policy or procedure are investigated and resolved. The CO will advise the CEO, the authorized committee on compliance activity, the Executive Committee and the Board of Governors of all complaints and their resolution. At least annually, the CO will submit to the Board of Governors or its authorized committee a summary report on the status of complaints and resolutions.

Accounting and Auditing Matters

The Arc New York's CO shall immediately notify the Board or its authorized committee of any compliance concerns or complaint regarding corporate accounting practices, internal controls or auditing and work with the committee until the matter is resolved.

Acting in Good Faith

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.

Handling of Reported Violations

The Arc New York's CO will notify the person who submitted a compliance complaint and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated, documented and appropriate corrective action will be taken if warranted by the investigation.

Office behavior and sexual harassment concerns are covered under The Arc New York Workplace Behavior and Sexual Harassment Policy and will be handled by the Director of Human Resources.