



To: Board and committee members, staff members, students and volunteers

Please confirm that you have read, understand and accept the policies and agreements that follow.

- Confidentiality Agreement
- Equal Access and Opportunity Policy
- Whistleblower and Fraud Reporting Policy

\_\_\_\_\_ Signature

\_\_\_\_\_ Date

EVANSTON COMMUNITY FOUNDATION  
CONFIDENTIALITY POLICY

**Policy**

The Evanston Community Foundation (the Foundation) recognizes that its efficient operation requires the maintenance and management of donor, grantee and employee information. Foundation records may contain sensitive information that must be maintained in confidence as an essential part of providing service to donors, grantees and the community.

**Disclosure**

All employees, board and committee members, and other volunteers who have access to sensitive Foundation information shall maintain the confidentiality of such information and shall not disclose it except as may be necessary in the performance of their duties on behalf of the Foundation. Confidential Foundation information may not be used for commercial purposes or personal gain, political activity, or for the advancement of other organizations. All questions relating to the applicability of this Policy shall be addressed to the Board Chair and/or President and CEO, who together shall be responsible for enforcing this Policy.

**Publication of Gifts**

Unless otherwise requested by the donor,

- (a) the names of donors may be included in Foundation publications and listed in giving categories or as part of a recognition program, but the Foundation will not publish the exact amount of any gift without the permission of the donor, and
- (b) the names of donors of memorial or tribute gifts may be given to the honoree or family members.

The Foundation will respect the anonymity of any donor who requests that the gift remain anonymous.

**Enforcement**

Violations of this Policy are considered serious and may result in appropriate disciplinary action.

*Approved: November 11, 2003; revised December 13, 2005, October 26, 2010*

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EVANTON COMMUNITY FOUNDATION  
POLICY OF EQUAL ACCESS AND  
OPPORTUNITY *Adopted March 13, 2002*

As a community foundation, the Evanston Community Foundation represents Evanston and its environs and all who live and work here. The Foundation is committed to equal access and opportunity as well as to the belief that diversity enhances and organization. The Foundation makes grants, conducts its programs, and hires staff without discrimination on the basis of participants' age, ethnicity, gender, race, religion, sexual orientation, or physical disabilities. The ECF Board seeks to reflect the diversity of the community in its composition.

# EVANTON COMMUNITY FOUNDATION WHISTLEBLOWER AND FRAUD REPORTING POLICY

## **General**

The objectives of the Whistleblower and Fraud Reporting Policy (“Policy”) are to establish policies and procedures for

- Reporting concerns regarding
  - questionable accounting or auditing matters,
  - violation of a state or federal statute,
  - violation or noncompliance with a state or federal rule or regulation,
  - violation of Foundation policies and procedures, or
  - unsafe working conditions or work practices in the exercise of Foundation business, either at the offices of the Foundation or elsewhere

by staff, directors, and volunteers of the Foundation, as well as by external parties, on a confidential, anonymous basis

- Receipt, retention, and investigation of complaints received by the organization regarding such concerns
- Protection of staff, directors, volunteers and external parties reporting concerns from retaliatory actions

## **Reporting Responsibility**

Each director, staff member, volunteer or external party has an obligation to report questionable or improper accounting or auditing matters or other violations as described above (“Concerns”).

## **Authority of Audit Committee**

All reported Concerns will be forwarded to members of the Audit Committee in accordance with the procedures set forth in this Policy. The Audit Committee will be responsible for investigating all reported concerns and making appropriate recommendations regarding those Concerns.

## **No Retaliation**

This Policy is intended to encourage and enable directors, staff, and external parties to raise Concerns within the Foundation for investigation. No director, staff member, volunteer, or external party who reports a Concern in good faith shall be subject to retaliation or, in the case of a staff member, adverse employment consequences. Any volunteer or staff member who retaliates against someone who has reported a Concern in good faith is subject to disciplinary action, up to and including dismissal from the volunteer position or termination of employment.

## **Reporting Concerns – Procedures**

### ***General***

A current list of Audit Committee members will be filed electronically on the Foundation’s computer network in the Board of Directors folders on Stations A and 1. The Whistleblower and Fraud Reporting policy will be issued to new staff members, directors, volunteers and external parties when they become associated with the Foundation.

### ***Employees***

If appropriate, an employee should first discuss his/her Concern with the President and CEO. If, after that discussion, the individual continues to have reasonable grounds to believe the Concern is valid, he or she should report the concern by a telephone call to the chair of the Audit Committee. If the chair is unavailable, any member of the committee may be contacted.

If the employee is uncomfortable speaking with his or her supervisor, or the supervisor is the subject of the concern, he/she should report the Concern directly to an Audit Committee member. Concerns may also be submitted anonymously in writing or via voice mail to an Audit Committee member.

### ***Directors, Volunteers and External Parties***

Directors, volunteers, and external parties should submit Concerns in writing to the Chair of the Audit Committee.

### **Investigation of Reported Violations**

The Audit Committee shall promptly investigate all reported Concerns. The chair of the Audit Committee shall immediately notify the Audit Committee and the President and CEO (unless he or she is involved in the Concern). In the case of non-anonymous reports, the Chair will notify the sender and acknowledge receipt of the Concern within five business days. If warranted, the Audit Committee will recommend corrective action to the Board of Directors. Any actions taken must include follow-up with the complainant.

The Audit Committee has the authority to retain outside legal counsel, accountants, private investigators, or any other resource deemed necessary to conduct a full and complete investigation of the allegations.

### **Acting in Good Faith**

Anyone reporting a Concern must act in good faith and have reasonable grounds for believing the information disclosed indicates an improper accounting or auditing practice, a violation of the policies and procedures of the Foundation or other. The act of making allegations that prove to be unsubstantiated, and that prove to have been made maliciously, recklessly, or with the foreknowledge that the allegations are false, will be viewed as a serious disciplinary offense and may result in discipline, up to and including dismissal from the volunteer position or termination of employment. Such conduct may also give rise to other actions, including civil lawsuits.

### **Confidentiality**

Reports of Concerns, and investigations pertaining thereto, shall be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation. Disclosure of reports of Concerns to individuals not involved in the investigation will be viewed as a serious disciplinary offense and may result in discipline, up to and including termination of employment. Such conduct may also give rise to other actions, including civil lawsuits.

### **Policy Distribution**

This policy will be distributed to all staff, directors, and volunteers of the Foundation, as well as to external parties to the Foundation.. The policy is also available upon request.