

## **Whistleblower Policy (December 19, 2012)**

SEALS requires officers, non-officer trustees, staff, and volunteers to observe high standards of ethics in the conduct of their duties and responsibilities.

This Whistleblower Policy encourages officers, non-officer trustees, staff, and volunteers to communicate to SEALS credible information on illegal practices or violations of policies of the organization, provides that SEALS will endeavor to protect the person communicating such information from retaliation, and identifies people to whom such information can be reported.

**1. Encouraging Reporting.** SEALS encourages prompt complaints, reports, or inquiries about illegal practices or violations of policies, including conduct by SEALS itself, by its leadership, or by others on its behalf. Appropriate subjects to raise under this policy may include financial improprieties, accounting or audit matters, and illegal practices or policies. Other matters for which SEALS has complaint mechanisms should be addressed under those mechanisms, unless those channels are themselves implicated in the wrongdoing. This policy is not intended to provide a means of appeal from outcomes of those other mechanisms.

**2. Protecting Persons from Retaliation.** SEALS prohibits retaliation against officers, nonofficer trustees, staff, or volunteers for making good faith complaints, reports, or inquiries under this policy or for participating in a review or investigation under this policy. This protection extends to those whose allegations are made in good faith but prove to be mistaken. This protection does not apply to persons who make bad faith, knowingly false, or vexatious complaints, reports, or inquiries or who otherwise abuse this policy. SEALS also reserves the right to take appropriate action against persons who retaliate against officers, non-officer trustees, staff, or volunteers in violation of this policy.

**3. Reporting Procedures.** A complaint, report, or inquiry may be made confidentially or anonymously and should describe in detail the specific facts demonstrating the basis for the complaint, report, or inquiry. It should be directed to the President of SEALS, to the Executive Director, or to any two of the other members of the Board of Trustees. (A list of the names of and contact information for members of the SEALS Board of Trustees is available at <http://sealslawschools.org/board.html>.)

**4. Action in Response to Report.** After receiving a complaint, report, or inquiry, SEALS shall promptly notify the sender that it was received. SEALS will conduct a discreet and objective review or investigation. Any person making a complaint, report, or inquiry must recognize that SEALS may be unable to evaluate a vague or general complaint, report, or inquiry that is made anonymously.