**Baltimore Council on Foreign Affairs Board of Trustees Whistleblower Policy**

**Purpose**The Baltimore Council on Foreign Affairs (BCFA) is committed to maintaining a culture of openness, accountability, and ethical conduct. This Whistleblower Policy is intended to provide a mechanism for trustees, officers, employees, and volunteers to report, without fear of retaliation, any concerns regarding illegal, unethical, or improper conduct related to BCFA’s operations and governance.

**Scope**This policy applies to all members of the Board of Trustees, officers, employees, and volunteers of the BCFA. It is designed to encourage reporting of any suspected violations of laws, regulations, BCFA policies, or ethical standards.

**Definition of Reportable Violations**Reportable violations under this policy include, but are not limited to:

1. **Fraud**: Any fraudulent activity, including financial misconduct, misappropriation of funds, or falsification of records.
2. **Legal Violations**: Any activity that violates federal, state, or local laws or regulations.
3. **Ethical Violations**: Conduct that breaches BCFA’s Code of Conduct, Conflict of Interest Policy, or other ethical standards.
4. **Safety Violations**: Any action that endangers the health or safety of BCFA personnel, members, or the public.
5. **Retaliation**: Any act of retaliation against an individual who, in good faith, reports a concern or assists in an investigation.

**Reporting Procedures**

1. **Reporting Channels**: Concerns may be reported to the Chairman of the Board of Trustees, the President, or any designated officer responsible for compliance and ethics.
2. **Anonymous Reporting**: While the BCFA encourages individuals to provide their names when reporting, anonymous reports will also be accepted and investigated to the extent possible.
3. **Good Faith Requirement**: Reports should be made in good faith with reasonable grounds for believing that the reported information indicates a violation of law or policy. Malicious or knowingly false reports may lead to disciplinary action.

**Investigation Process**

1. **Review of Report**: All reports will be reviewed promptly by the designated officer or a Whistleblower Committee to determine the appropriate scope and course of the investigation.
2. **Confidentiality**: To the fullest extent possible, the identity of the whistleblower will be protected, consistent with the need to conduct a thorough investigation.
3. **Documentation**: A written record of the reported incident and investigative steps taken shall be maintained in accordance with BCFA’s record-keeping policy.

**Protection from Retaliation**The BCFA strictly prohibits any form of retaliation against any individual who, in good faith, reports a concern or participates in an investigation. Retaliation includes adverse employment actions, harassment, demotion, or discrimination. Individuals who believe they have been subjected to retaliation should report this to the Board Chair, Executive Director, or designated compliance officer.

Violations of this anti-retaliation provision may result in disciplinary action, up to and including termination of employment or removal from the Board.

**Annual Review and Training**The Whistleblower Policy shall be reviewed annually by the Board of Trustees to ensure its effectiveness. Trustees and employees will receive annual training on the Whistleblower Policy, including information on how to identify and report potential violations.

**Policy Approval and Amendments**This Whistleblower Policy shall be approved by the Board of Trustees and may only be amended by a majority vote of the Board.