

GIRL SCOUTS OF EASTERN MASSACHUSETTS VOLUNTEER POLICIES AND PROCEDURES

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*Interested in learning more about GSEMA’s governance, including how policies are created and revised?
[Visit the Council Delegates page on our website.](#)*

Board of Directors Statement

This document contains policies and procedures related to volunteers (“Volunteer Policies”). These policies and procedures were approved and are maintained by the Board of Directors of Girl Scouts of Eastern Massachusetts as of June 2013. All policies are subject to ongoing review and revision by the Board of Directors. Girl Scouts of Eastern Massachusetts (GSEMA) reserves the right to refuse reappointment, dismiss or exclude affiliation with GSEMA any volunteer who refuses to conduct herself/himself in a manner that is consistent with the principles of the Girl Scout Movement, or who violates any policies of Girl Scouts of the USA or GSEMA.

Defining Policies and Procedures

A **policy** is an established position that must be followed. Policies provide consistency of actions, gives direction, and minimizes the need for risk management. Difficulty or inconvenience in carrying out the requirements of a policy shall not be used as an excuse for not adhering to the policy.

Only GSEMA’s Board of Directors may make, change or adapt our Volunteer Policies. Staff, volunteers and service units may not make, change or adapt the Volunteer Policies. The Volunteer Policies exist for the protection of all Girl Scout members. Adherence to all GSEMA policies, including the Volunteer Policies, ensures a consistent, safe, and quality volunteer experience and a safe, outcomes-based program delivery for girls.

A **procedure** describes the course of action to carry out a particular policy.

Membership Definitions

Membership in Girl Scouts of the USA (GSUSA) is required by both adults and girls to participate in Girl Scouts. A Girl Scout “member” is defined as either an adult or girl who has completed the [Adult GSUSA Membership](#) or [Girl GSUSA Membership](#), has paid, or had paid for them, the annual Membership Dues, or is a Lifetime Member, and has accepted the Girl Scout Promise and Law. A “volunteer” is defined as an adult over the age of 18 who has completed the membership registration including a criminal background check, has been assigned a volunteer position by a GSEMA staff member, or authorized volunteer representative, and has completed the [Online Volunteer Agreement](#), and when required, a Volunteer Agreement specific to their assigned position. A “girl” is defined as a girl grades kindergarten through twelfth grade that has completed the membership registration.

UNIVERSAL POLICIES OF GSEMA

The following policies are to be used in conjunction with Girl Scouts of the USA’s [Blue Book of Basic Documents, Safety Activity Checkpoints, Volunteer Essentials](#) manual and [GSEMA Bylaws](#). It is also expected that all Girl Scout members act within the guidelines of the Girl Scout Promise, Law and Mission. The language in the Volunteer Policies constitutes guidelines only and is not intended to create an expressed or implied contract or employment relationship between GSEMA and its volunteers. Both GSEMA and the volunteer are free to terminate the volunteer relationship with or without cause. GSEMA’s Board of Directors reserves the right to modify, change, disregard, suspend, add to or cancel at any time, without written or verbal notice, all or any part of the Volunteer Policies’ contents as it deems appropriate.

Anti-Discrimination Policy

GSEMA’s policies expressly prohibit any form of unlawful discrimination on the basis of race, color, religion, sex, gender identity and expression, age, national origin, sexual orientation, marital status, learning disability and physical or mental disability, ancestry, genetic information or any other class protected by applicable state and federal law, by and toward any volunteer, member or girl.

GSEMA affirms its commitment to comply with all applicable state and federal laws and regulations with respect to its programs, activities and service to girls and volunteers. GSEMA is committed to assuring inclusion of all population groups within its jurisdiction, and is committed to extending the opportunity of Girl Scouting in the recruitment, selection, placement, development and recognition of girls and volunteers in all communities within its jurisdiction. GSEMA welcomes the participation of all girls and volunteers and will make reasonable accommodations to persons with disabilities. Girls and volunteers requiring reasonable accommodations to fully participate in Girl Scouting should contact GSEMA’s [Customer Care](#) team.

Anti-Bullying Policy for Members

GSEMA expects that all members will treat each other in a civil manner, with respect for differences and within the facets of the Girl Scout Promise and Law. GSEMA is committed to providing all members with a safe environment that is free from bullying and cyber bullying.

“Bullying” is defined as the repeated use by one or more members of a written, verbal or electronic expression or a physical act or gesture or any combination thereof, directed at a member that: (i) causes physical or emotional harm to the member or damage to the member’s property; (ii) places the member in reasonable fear of harm or of damage to the member’s property; (iii) creates a hostile environment at Girl Scout related activities for the member; (iv) infringes on the rights of the member at Girl Scout related activities; or (v) materially and substantially disrupts Girl Scout related activities. “Cyber-bullying” is bullying through the use of technology or any electronic communication, and includes, but is not limited to, computers, cell phones, and the Internet.

GSEMA will not tolerate any unlawful or disruptive behavior, including any form of bullying, cyber bullying or retaliation, in our troop/group meetings, on properties, at camps, or in any Girl Scout related activities. GSEMA will investigate promptly all reports and complaints of bullying and retaliation, and take prompt action to end that behavior and restore a sense of safety to all girls involved. This commitment is an integral part of our comprehensive efforts to promote girl leadership, and to prevent and eliminate all forms of bullying and other harmful and disruptive behavior between girls that can impede that process.

Procedure for reporting bullying:

Step 1 – For Girl Members

A girl member should address their concern to their family/guardian and/or troop/group volunteer. It is hoped that a meeting between the members, their families/guardians and the troop/group volunteers will resolve the issue immediately.

Step 2 – For Girl and Adult Members

When the members, their families/guardians and/or troop/group volunteers are unable to stop the bullying and/or retaliation through informal efforts, troop/group volunteers are required to contact the [Customer Care](#) team who will contact the Volunteer Support Specialist to initiate the Conflict Resolution Procedure. [\(see page 5\)](#). Family members may also contact a [GSEMA Volunteer Support Specialist](#) for support.

Step 3 – For Girl and Adult Members

If the girl(s) and/or their families/guardians and/or the troop/group volunteers would like to file a complaint with GSEMA, the troop/group volunteers should contact the [Manager of Volunteer Support](#).

Child Abuse Prevention Policy

Girl Scouts of Eastern Massachusetts supports and maintains environments that are free of child abuse, including but not limited to sexual abuse, and neglect.

Child abuse and neglect are defined as any recent act or failure to act which results in death, serious physical or emotional harm, sexual abuse or exploitation, or an act or failure to act which presents an imminent risk of serious harm.

Sexual abuse is defined as the employment, use, persuasion, inducement, enticement, or coercion of any child to engage in, or assist any other person to engage in, any sexually explicit conduct or any simulation of such conduct for the purpose of producing any visual depiction of such conduct; or rape, and in cases of caretaker or inter-familial relationships, statutory rape, molestation, prostitution, or other form of sexual exploitation of children, or incest with children.

Child abuse and neglect are unlawful acts and it is against GSEMA’s policy for any volunteer or employee to physically, sexually, or mentally abuse or neglect any member.

Child Abuse Reporting Policy

When a girl member tells an employee, or volunteer, that they have been the victim of child abuse or neglect, as defined in the organization’s [Child Abuse Prevention and Reporting Policies](#), that employee or volunteer is required to immediately report the alleged abuse to the [Membership Services Support Coordinator](#). In addition, any employee or volunteer that suspects that a child has been the victim of child abuse or neglect as defined in the organization’s policy is required to immediately report the suspected abuse to the [Membership Services Support Coordinator](#).

It is also expected that an employee, or volunteer, who witnesses or suspects a girl member is intentionally hurting herself will report the incident or suspicion to the [Membership Services Support Coordinator](#).

Procedure for Reporting Child Abuse

If the child is in immediate harm, call the Girl Scouts of Eastern Massachusetts emergency number on the [GSEMA Emergency Procedures](#) card (1-800-348-7788).

If the child is not in immediate harm, the employee or volunteer documents the information as thoroughly as possible on the [Child Abuse Incident Report Form](#) within 24 hours of the suspected or reported abuse and emails it to the [Membership Services Support Coordinator](#).

Membership Services Support Coordinator

Girl Scouts of Eastern Massachusetts
265 Beaver Street Waltham, MA
02452 avannederpelt@gsema.org

The [Membership Services Support Coordinator](#) will make inquiries about the incident and document the resolution of the incident.

Confidentiality Policy

It is against GSEMA's policies for any volunteer to disclose non-public personal, health or financial information about any girl or volunteer or member which becomes known to them through their volunteer position. Financial information may only be shared when necessary to access financial aid, other support available from GSEMA for that individual, and only through established systems or the appropriate GSEMA staff contact. Collected health information may be disclosed to the extent necessary solely for treatment purposes.

Names, addresses and phone numbers of members, families/guardians, staff and volunteers shall not be disclosed without permission of the member, the girl's family/guardian, staff and volunteers, verbally, electronically or otherwise, except as required for safety. The privacy of all GSEMA members, families/guardians, staff and volunteers must be respected and protected.

For additional details, please see GSEMA's [Comprehensive Information Security Program Summary \(CISP\)](#).

Conflict of Interest Policy

Each volunteer has an obligation to conduct business within guidelines that prohibit actual or potential conflict of interest. An actual or potential conflict of interest occurs when a volunteer is in a position to influence a decision that may result in a personal gain for their self or for a relative as a result of their dealings with Girl Scouts. For purposes of this policy, a relative is defined as any person who is related by blood or marriage or whose relationship is similar to that of persons who are related by blood or marriage.

Conflict of Interest Procedure

If a volunteer has any influence on transactions involving purchases, contracts or leases, it is imperative that it is disclosed in writing to the Chief Executive Officer or an officer of the board as soon as possible so that safeguards can be established to protect all parties. Conflict of interest reports should be submitted to:

Chief Executive Officer

Girl Scouts of Eastern Massachusetts
265 Beaver Street Waltham, MA 02452

Conflict Resolution

GSEMA has established a [procedure for resolving conflicts](#) which arise when an operational volunteer, as defined in page 11 of these policies, believes that policies and/or procedures related to her/his position are not being administered properly as applied to her/him. Every volunteer may expect prompt attention to her/his concerns and a fair resolution of the complaint without fear of jeopardizing her/his volunteer status. The initiation of the [Procedure to Resolve Girl Scout Member Conflicts](#) will not restrict GSEMA from taking appropriate action to safeguard the health and safety of the girls whenever necessary.

Conflict Resolution Procedure

Step 1

A volunteer should address her/his concern to the [Customer Care](#) team who connect the volunteer to their [GSEMA Volunteer Support Specialist](#). It is expected that most, if not all, situations will be resolved through informal conferences and communications at this step.

Step 2

When a volunteer and her/his [Volunteer Support Specialist](#) are unable to resolve a complaint through informal efforts, the volunteer may request a copy of GSEMA's [Procedure to Resolve Girl Scout Member Conflicts](#) which detail the steps that must be followed to resolve the conflict.

Step 3

If a final resolution has not been met after following the proper steps detailed in the Conflict Resolution Procedures for Volunteers, the volunteer may request a meeting with the [Associate Director of Volunteer Support](#).

Financial Assistance Policy

GSEMA designates funds for financial assistance for girls and volunteers, based on need. Council financial assistance will be administered so that every member has equal opportunity to participate in any Girl Scout program, activity or event within GSEMA's budget limit. Troop/group volunteers should let families/guardians know about the opportunity for financial assistance.

Council financial assistance for girl members who live within GSEMA communities, includes:

- Membership fee assistance.
- Girl program registration fees.
- Camperships for either resident or day camps.

Council financial assistance for volunteers includes:

- Membership fee assistance.
- Training fee assistance for camping training, council sponsored CPR/FA courses and conferences.

Procedure for Applying for Financial Assistance

For girl members:

- Complete the online [Girl GSUSA Membership](#) process and select "Financial Aid" at checkout.
- Complete [Program Financial Aid Application](#).
- Complete the camper financial aid application (formerly campership) in the [Camp FAQs](#).

For volunteers:

- Complete the online [Adult GSUSA Membership](#) process and select "Financial Aid" at checkout.
- Contact GSEMA's [Customer Care](#) team for training fee assistance.

Firearms, Weapons and Fireworks Policy

The use and/or possession of any firearms and weapons on GSEMA properties are strictly prohibited except by law enforcement officers. The use and/or possession of fireworks on GSEMA properties are strictly prohibited.

Use and/or possession of any firearms and/or weapon and/or fireworks on GSEMA properties will result in immediate disciplinary action, up to and including release or termination from appointment.

Harassment

Harassment is behavior that is not welcomed by an individual and is humiliating, demeaning or offensive. Behavior is considered harassment when such conduct has the purpose or effect of unreasonably creating an intimidating, hostile, or offensive environment for Girl Scout adult members or families/guardians, or interfering with a volunteer's performance. Harassment can be physical, written or verbal behavior and can include stereotypical statements, derogatory statements, abusive language, and discriminatory remarks that are offensive or objectionable to the recipient, cause the recipient humiliation, or interfere with the recipient's Girl Scout experience. Harassment can also be electronic, especially when emails and social media posts become intimidating, hostile, or offensive.

GSEMA is committed to an environment in which relationships are characterized by dignity, respect, courtesy and equitable treatment. It is the policy of the organization to provide all members with an environment free from all forms of unlawful or unwelcome harassment, including implied or expressed forms of sexual harassment.

GSEMA takes allegations of harassment seriously and will respond promptly to complaints of harassment. Where it is determined that such inappropriate conduct has occurred, GSEMA will act promptly to eliminate the conduct and impose such corrective action as is necessary, including disciplinary action where appropriate, up to and including immediate release of the member, against any member that it determines to have engaged in conduct prohibited by this policy. All complaints will be investigated as discreetly and confidentially as possible.

Sexual Harassment Policy

It is the policy of the organization to provide all volunteers with an environment free from sexual harassment. It is against GSEMA's policies for any individual, male or female, to sexually harass another volunteer, employee or Girl Scout member of the same or opposite sex. GSEMA reserves the right to refuse membership or reappointment, and to release or terminate from affiliation with any volunteer who, in conducting or participating in Girl Scout activities, sexually harasses another volunteer, employee or Girl Scout member.

Sexual harassment includes, but is not limited to, unwelcome sexual advances, requests for sexual acts or favors, and verbal or physical conduct of a sexual nature when (a) submission to or rejection of such advances, requests or conduct is made either explicitly or implicitly a term or condition of status within GSEMA or is used as a basis for decision concerning status within GSEMA or (b) such advances, requests or conduct have the purpose or effect of unreasonably interfering with a GSEMA community member's involvement with GSEMA by creating an intimidating, hostile, humiliating or sexually offensive environment. Some examples of sexual harassment that could create a hostile environment include, but are not limited to, telling of sexual jokes or stories, the presence of sexually explicit photographs or other materials, making sexual comments about another person's body, making sexual comments or innuendoes, asking personal questions about another person's social or sexual life, staring, leering and/or making sexual gestures.

Procedure for Reporting Harassment and Sexual Harassment

If a member or a family member/guardian of a girl member believes that they have been subjected to harassment, they have the right to file a complaint with GSEMA using the following process:

Step 1

It is expected that adults involved in Girl Scouting, including girls' family members, will act as role models for girls demonstrating respect and courtesy to all members. When harassment or offensive behavior is alleged between adults, including, but not limited to, family member to family member, volunteer to volunteer, or volunteer to family member, it is expected that the adults will resolve the issue among themselves without involving girl members or other Girl Scout members.

Step 2

When adults are unable to resolve the complaint among themselves any adult involved may contact the [Customer Care](#) team who will connect them to their Volunteer Support Specialist for support and initiation of the [Conflict Resolution Procedure](#).

Step 3

If the [GSEMA Volunteer Support Specialist](#) is unable to resolve the complaint, then the [Manager of Volunteer Support](#) may be contacted.

In the event, that the parties are uncomfortable speaking with a [GSEMA Volunteer Support Specialist](#) and/or [Manger of Volunteer Support](#), adults involved in Girl Scouting may contact the [Manager of Volunteer Support](#) to discuss and to obtain information about GSEMA's policy on harassment and the complaint process.

Meeting Place Policy

Girl Scouts of Eastern Massachusetts requires that troop/group meetings take place in safe, community settings that are accessible to all members, including girls and adults with disabilities, and adhere to the criteria in the [Meeting Space Guidelines](#) (e.g., schools, community centers, libraries, places of worship, etc).

In rare instances where access to community settings is limited, GSEMA may make an exception, on a limited basis, for troops/groups to meet in private homes. All the criteria on the [Meeting Space Guidelines](#) must be met to meet on private property. Troops/groups applying to conduct meetings in private homes must review the Meeting Space Guidelines, then submit and have approved the Meeting on Private Property Application prior to any meetings in that residence.

Social Media Communications

Troops/groups and service units may create a website and/or use social media to promote Girl Scouting or communicate with members. When creating websites or using other forms of social media, including, but not limited to, Facebook, Twitter, Pinterest, Instagram, Tumblr, at least one adult GSEMA member must be an “owner” of the accounts and/or website.

Troops/groups and service units using social media must adhere to the age requirements established by social media sites. All minor Girl Scouts must obtain parental permission to use the troop/group website or social media accounts and must have a photo release on file with their troop/group or service unit. Girl family members/guardians must be invited to become members of all troop/group and service unit social media accounts and given links to any troop/group websites.

When creating a new website or social media account, troops/groups and service units should contact the GSEMA Marketing Department for guidance. All volunteer and/or girl created social media accounts should be clearly identified as belonging to a particular troop/group or service unit and state they are maintained by volunteer(s) and/or girl(s) and are not the official site of GSEMA. Practice diligence to ensure that groups joined or linked to have standards consistent with Girl Scouts and ensure the messages posted do not conflict with Girl Scout positions.

Non-Smoking Environment Policy

GSEMA maintains a non-smoking environment in and at all Girl Scout activities and sites, including transportation to and from such sites and/or activities. Smoking, including vaping and electronic cigarettes, must not take place within the view of any girls and not within any GSEMA facilities or properties.

Substance Use and Abuse Policy

GSEMA has an obligation to its girl members and their families/guardians, its volunteers and staff to maintain a drug and alcohol free environment. GSEMA prohibits:

- Use, possession, transfer or sale of illegal drugs.
- Use or being under the influence of legal substances (including but not limited to alcohol, tobacco, marijuana, or any other medications without a prescription), when in the presence of girls, including while driving girls; when carrying out a Girl Scout program, including meetings in private homes; or otherwise volunteering on behalf of GSEMA.

Any volunteer engaged in the use, possession, transfer or sale of illegal drugs; the improper use of legal substances; the use or being under the influence of legal substances when in the presence of girls, when carrying out a Girl Scout program, or otherwise volunteering on behalf of GSEMA is subject to immediate release from their volunteer position. Any volunteer or member engaged in giving illegal drugs, legal substances (including but not limited to alcohol, tobacco, marijuana, or medications not explicitly prescribed and given express written permission to the girl(s)) will be immediately released from their volunteer position and their membership will be terminated.

Alcohol may be served at adult-only fundraising/donor events or adult-only gatherings with prior authorization from the GSEMA Executive Team. The Executive Team, at their discretion, may provide authorization for alcohol to be served on GSEMA properties when the properties are being rented by individuals/groups/organizations for non-Girl Scout related activities (such as facilities rentals for weddings, parties, etc.).

Transportation of Members Policy

It is GSEMA policy that transportation of any member to and from Council approved activities is done in accordance with applicable law and as outlined in [Safety Activity Checkpoints](#). Drivers are required to have a valid driver's license, insurance, a properly registered vehicle, and be at least 21 years of age to transport girls.

Whistleblower Policy

A whistleblower, as defined by this policy, is a volunteer or Girl Scout member who reports an activity that they consider to be illegal or dishonest. The whistleblower is not responsible for investigating the activity or determining fault or corrective measures; appropriate management officials are charged with these responsibilities.

Examples of illegal or dishonest activities include violations of federal, state or local laws; billing for services not performed or goods not delivered; fraud, corruption, or other forms of lawbreaking covered by the Racketeer Influenced and Corrupt Organizations Act (RICO), the Whistleblower Protection Act of 1989, or by state whistleblower statutes; and other fraudulent financial reporting.

It is the responsibility of all volunteers or Girl Scout members to report ethics violations or suspected ethics violations in accordance with this Whistleblower Policy. No volunteer or Girl Scout member who in good faith reports an illegal or dishonest activity shall suffer harassment, retaliation or adverse consequence. See Addendum Two of this document for the full Whistleblower Policy.

Procedure for Whistleblowers

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 or a violation of the code of conduct. Concerns should be submitted in writing directly to the Chair of the Audit Committee.

Chair of the Audit Committee

Girl Scouts of Eastern Massachusetts
265 Beaver Street Waltham, MA 02452

[GSEMA Board of Directors](#)

VOLUNTEER MANAGEMENT SYSTEM POLICIES

Volunteer Philosophy

We maintain that the strength of the Girl Scout Movement rests in the volunteer leadership of its adult members. It is through this volunteer leadership that the Movement serves girls. GSEMA consists of volunteers who strengthen GSEMA through two distinct types of service: operational volunteers and policy-making volunteers. Operational volunteers (e.g., service unit members, troop volunteer members, etc.) are those involved in carrying out the specific, measurable objectives of GSEMA, which have been developed within the framework of the organization's goals as adopted by the Board of Directors. These volunteers are ultimately accountable to the Chief Executive Officer. Policy-making volunteers include officers, board members, board committee members, and board nominating and development committee members. While volunteers are not employees of GSEMA, they are key contributors to the success of the GSEMA mission, and are also obligated to comply with and conform to all GSEMA and GSUSA policies pertaining to volunteer service.

GSEMA will provide every volunteer with resources through the entire Volunteer Management System including Recruitment, Screening, Appointment, Support, Training, and Appreciation.

Recruitment

Upon recruitment every volunteer candidate is required to complete the following: [Adult GSUSA Membership](#), [CORI/SORI Acknowledgement Form](#), the online national background check process through Verified Volunteers (an online national screening for those who have not lived in MA for the past 7 years) and the [Online Volunteer Agreement](#). A link to Verified Volunteers (an online national screening for those who have not lived in MA for the past 7 years) will be emailed to each volunteer candidate after completing the [Adult GSUSA Membership](#).

Criminal Background Check

In order for GSEMA to obtain information necessary to safeguard the health, safety and general well-being of the girls we serve, GSEMA requires that every volunteer become an [adult member of GSUSA](#), complete the [Online Volunteer Agreement](#) and complete a thorough criminal background check process. Prior to having any contact with girls or access to their personal information or managing Girl Scout funds, potential volunteers are required to become an [adult member of GSUSA](#), complete Massachusetts' Criminal Offender Record Information (CORI) in accordance with Massachusetts state law Chapter 6 Section 167 (G.L. c. 6 §167) and Sexual Offender Record Information (SORI) screening in accordance with the regulations of the Sex Offenders Registry Board (SORB),

and applicable regulations of the Massachusetts Department of Public Health, as well as national backgroundscreening through Verified Volunteers (an online national screening for those who have not lived in MA for thepast 7 years). For some volunteer positions, further screening may be required including reference checks.

Volunteer candidates whose records indicate a history of child abuse, violent crime or sexual crimes will be denied a position. At the discretion of GSEMA, volunteer candidates may be denied a position due to financial irresponsibility, drug and alcohol related offenses, or other serious offenses or history that is not conducive withthe organization’s mission, values or the safety and well-being of girls. Volunteers will be required to submit a [CORI/SORI Acknowledgement Form](#) and complete the online national background screening process through Verified Volunteers (an online national screening for those who have not lived in MA for the past 7 years) once every three years. Volunteers are required to immediately report any arrest or conviction to the [Senior Director of Membership](#). Volunteers will be provided with a complete copy of their criminal background check results upon request. See Addendum One of this document for the full Criminal Background Screening Policy.

Online Volunteer Agreement

At the start of every membership year and prior to beginning their volunteer role and/or meeting with girls, allvolunteers must complete the [Online Volunteer Agreement](#). The [Online Volunteer Agreement](#) ensures that volunteers are informed about their roles and responsibilities as a GSEMA volunteer and agree to adhere toGSEMA’s policies and procedures. In some instances, volunteers may be asked to complete an additional volunteer agreement specific to their volunteer role.

Appointment

All volunteer appointments are made at the sole discretion of GSEMA. Every potential volunteer is selected and appointed by an administrative volunteer designated by GSEMA and/or GSEMA staff. Every attempt will be madeto place operational volunteers in positions that meet both their needs/interest and the needs of GSEMA. In instances where this is not possible, the needs of GSEMA will take precedence over the needs of the individual. Individuals not placed in a position for which they applied may be recommended for other positions; they may alsorequest reassignment. All operational volunteers (e.g., troop volunteers, service unit team members, etc.) shall be appointed annually for a term of one year or as designated on the position description.

Position Descriptions

Each volunteer role has a written [volunteer position description](#) that defines the position’s specific duties and responsibilities, qualifications, required training and term of appointment. A full listing of volunteer position descriptions and volunteer agreements may be found on GSEMA’s [Ways to Volunteer](#) web page. Volunteers will receive a copy of their volunteer position description upon appointment.

Membership

All volunteers participating in the Girl Scout Movement shall meet GSUSA membership standards, shall agree toabide by the policies and principles of both GSUSA and GSEMA, and be a [registered member of GSUSA](#).

Reappointment

GSEMA has the right to refuse reappointment. Reappointment of all volunteers is done by either an administrativevolunteer designated by GSEMA and/or GSEMA staff. Reappointment is contingent on acceptance of position accountabilities, expectations, and time commitment as outlined in the volunteer agreement.

Support

GSEMA will support all volunteers in their volunteer roles in the following ways:

- Provide a contact person (staff or volunteer) to answer questions/give direction via telephone, direct contact or email
- Provide additional in-community support for new troop leaders through local service unit volunteers (where available)
- Provide national programming resources for troops through the Volunteer Toolkit and printed resourcesavailable in the shop
- Provide aids such as girl programs, program kits and other packaged and convenience programs for anominal fee
- Assist with conflict mediation
- Offer adult learning opportunities, both in person and online through LEAD Online, in areas of orientation,position training, CPR/First Aid and outdoor skills

- Offer skill building and networking opportunities through our annual Volunteer Conference
- Offer volunteer opportunities beyond the position currently held
- Provide start-up support for new troops/groups
- Provide ongoing support to various pathways, service units and/or events
- Provide safety guidelines detailed in [Volunteer Essentials](#) and [Safety Activity Checkpoints](#)

Adult Learning

Each volunteer is required to complete adult learning courses designated for her/his position. Adult learning courses will ensure that each volunteer has the knowledge and skills needed to perform successfully in the position for which they have been appointed. GSEMA outlines adult learning course requirements essential for each volunteer in their [volunteer position description](#). Refusal or inability to participate in the required courses can result in a volunteer's release from, or non-appointment to, a position.

Recognition

GSEMA values the contributions of its volunteers and recognizes their service through various avenues. The formal GSEMA volunteer recognition system is consistent with the most current GSUSA guidelines.

Release

Any volunteer may resign her/his position upon written notification to her/his appointed administrative volunteer or GSEMA staff contact. GSEMA may release a volunteer for any reason, at its sole discretion, including but not limited to:

- Restructuring of volunteer positions
- Elimination of the volunteer position in which a person serves
- Inability or failure of the volunteer to complete the requirements for the position
- Failure to complete training required for the volunteer position
- Misappropriation of funds
- Failure to cooperate in any type of financial review of a troop/group or service unit account
- Failure to pay product program bill
- Failure to adhere to GSEMA's product program guidelines
- Inability or failure to perform to GSEMA's satisfaction
- Failure to comply with GSEMA or GSUSA policies
- Failure to support the mission and values of the organization and GSEMA goals
- Membership in an organization whose goals are not compatible with those of GSUSA
- Listed in the sex offender registry of any state or conviction of a sexual or related offense
- Providing false, incomplete, or misleading information on the volunteer application
- Inappropriate behavior including, but not limited to, physical violence, abuse, carrying firearms, stalking, threatening, menacing, lying, harassment, sexual harassment, or falsification of documents
- An unacceptable criminal background check (CORI/SORI) or national background check through Verified Volunteers (an online national screening for those who have not lived in MA for the past 7 years) or failure to report arrest or conviction
- Any breach of the [Online Volunteer Agreement](#)

A volunteer can only be released by a GSEMA staff member. Any volunteer who is released from their Girl Scout position may continue her/his membership with GSUSA unless it is determined that they are not able to meet the membership requirement related to accepting the principles and beliefs of the organization or to support the mission and values of the organization.

FINANCIAL ACCOUNTABILITY POLICIES

Financial Accountability Overview

Those assuming responsibility or oversight of any Girl Scout monies within GSEMA are accountable to GSEMA for those funds. All adults handling money must be registered members of GSEMA and have a valid [CORI/SORI Acknowledgement Form](#) on file and have successfully completed the online national background check process through Verified Volunteers (an online national screening for those who have not lived in MA for the past 7 years).

Volunteers are responsible for complying with all financial, fund raising and money-earning policies and procedures including those related to, but not limited to:

- Money handling
- Banking
- Record keeping
- Timely reporting
- Money-earning activities
- [End of the year financial reporting](#)

Debts Incurred by Volunteers

A debt is defined as: a check written for insufficient funds, unpaid product program funds to the organization or the troop/group, non-payment of fees promised and any other amounts owed to the organization for products or services. Debts to GSEMA or debts incurred in the name of the troop to outside vendors, banks or for services rendered which become past due will be processed for collection. Unpaid funds collected for product sales or events or misuse of troop/group, service unit or the organization's funds are considered mishandled funds.

When a debt is incurred, individuals may be released from volunteer positions and/or subject to legal action, including but not limited to potential criminal prosecution, for misappropriation of funds. A volunteer who repays a past due debt may be re-appointed as a volunteer, but will not be allowed to hold a money handling or leadership position.

Opening Troop/Group and Service Unit Bank Accounts Policy

All funds held on behalf of a specific troop/group or service unit must be deposited in a bank account in the troop/group or service unit name under the umbrella of Girl Scouts of Eastern Massachusetts, Inc. In addition, all accounts must be held under the Tax ID # of Girl Scouts of Eastern Massachusetts, Inc.

Troop/group and service unit bank accounts under GSEMA's Tax ID should be used solely for the purpose of activities related to Girl Scouting, including but not limited to membership, girl programming, and group trips; volunteers should never use troop/group funds for personal expenses.

The Tax ID may only be used to open troop/group and service unit bank accounts. All accounts must adhere to the following procedures:

- Properly identified as Girl Scouts of Eastern Massachusetts, Inc.
- Include troop/group number, or Girl Scouts of Eastern Massachusetts, Inc.
- Addressed to and in care of the authorized signers on each account
- Include two authorized adult volunteers to act as signers on each account
 - For service unit accounts the Service Unit Coordinator and the Treasurer act in this role
 - For troop/group accounts there must be two non-related registered adult volunteers

Authorized signers are not permitted to conduct any other business on behalf of GSEMA or to access any accounts GSEMA may maintain at the bank except their own troop/group account. GSEMA may, at its discretion, gain access to troop/group and service unit bank accounts and records to audit accounts when deemed necessary.

Volunteer's Role in Troop/Group and Service Unit Financing

The account signers must periodically inform parents and girls of the troop's/group's financial status. All registered adults in the troop/group have the responsibility and right to review the troop's/group's financial books to ensure accuracy in accounting. All registered adults with the troop/group should ensure that accurate records of income and expenditures are maintained and reported regularly at the troop/group meeting.

Service Unit Treasurers must give a regular report of income and expenses at service unit meetings. The Service Unit Treasurer is also responsible for following the [Annual Service Unit Finance Report Guidelines](#) and must complete, and submit the [Annual Service Unit Financial Report](#) to the GSEMA designated staff person no later than June 30.

Financial Reporting Policy

GSEMA staff or authorized volunteers have the right to conduct a mid-year financial review of any troop/group or service unit accounts to ensure that they are on track to meet their financial year-end goals. In addition, each troop/group and service unit is required to submit an [Annual Troop Financial Report](#) / [Annual Service Unit Financial Report](#) and a copy of the most recent bank statement to the

assigned

GSEMA staff member no later than June 30. GSEMA may require, at its sole discretion, troop/groups and service units provide more frequent financial reporting on demand.

Year End Balance in Troop/Group Treasuries

Troops/groups may carry over balances in the troop/group treasury from one year to the next. Funds from a troop/group treasury should never be spent down frivolously or given directly to girls. Troop/group money benefits the entire troop/group and is not owned or tracked for individual girl use.

Acceptable reasons for using or maintaining a balance in a troop/group treasury include:

- Payment of individual membership registration fees for returning or new members
- Gifts for bridging girls, such as program-level materials (Journeys Girl Books or The Girl's Guide to GirlScouting), or uniform components such as sashes or vests
- Saving for major or extended trips
- Registering for troops'/groups' activities in the next membership year

Massachusetts Sales Tax Exemption Number

Troops/groups and service units may use the Girl Scouts of Eastern Massachusetts' Sales Tax Exemption Number when purchasing supplies for use in Girl Scout events/activities. When using the tax exemption number, volunteers may need to provide an exemption certificate for the supplier from whom a purchase is being made. It is important that the certificate be properly completed in order to comply with regulations pertaining to the exemption. Charitable exemption numbers will not be issued to individual troops/groups; therefore, all volunteers need to use the exemption number issued to GSEMA. At no time may the sales tax exemption be used for personal purchases or for the benefit of another organization.

The Massachusetts Sales Use and Tax Exemption Certificate may be obtained by contacting GSEMA's [CustomerCare](#) team.

Troop/Group and Service Unit Money Earning Policy

It is expected that the bulk of a troop/group and service unit money-earning will come from participation in the GSEMA Fall Product Sale and Girl Scout Cookie Sale Programs. Troops/groups are required to participate in Council product sales as their primary money-earning activity; any troop/group money-earning should not compete with the Girl Scout Cookie Program or other Council product sales. All girl troop/group members must be registered members prior to participating in Council product sales and/or additional money-earning activities.

Money Earning Council Approval Procedure

GSEMA will not approve requests from troops/groups for any money-earning activities during the annually scheduled Fall Product Sale and the Girl Scout Cookie Sale Programs. As a result, additional money-earning activities will only be approved for dates prior to, or after, the annually scheduled Fall Product Sale and the Girl Scout Cookie Sale Program dates.

In order to be eligible for additional money-earning activities a troop/group must:

- Receive written approval from GSEMA prior to carrying out a money-earning activity by completing the [Girl Scout Activity Form](#) at least 4 weeks in advance of the activity and prior to finalizing any plans.
- Have an [Annual Troop Financial Report](#) on file for the prior year (unless they are a new troop).
- Participate in the GSEMA Fall Product Sale and Girl Scout Cookie Sale Programs.
- Choose dates for money-earning activities that are outside of the annually scheduled dates of the Fall Product Sale and the Girl Scout Cookie Sale Programs. Dates for both sales will be set by the Product Sales Department on August 1st of each year.
- Report all monies earned within 10 days of the money-earning activity to the Council via the online [Money-Earning Report](#).

Money-earning for higher awards and extended trips:

Money-earning for take action projects associated with earning one of the highest awards (Bronze, Silver

and Gold Awards) and for extended trips, with an [Application for Extended Trips](#) submitted to [Customer Care](#), will be considered on a case by case basis at any time during the membership year if the troop/group has participated in both the GSEMA Fall Product Sale and Girl Scout Cookie Sale Programs in the past 12 months.

For service units:

Service Units may submit requests for “group money-earning” activities/events by using the [Girl Scout Activity Form](#) at any time during the membership year, so long as there is a clear purpose for raising the funds, the activity is clearly identified as a money-earning activity, the service unit has an [Annual Service Unit Financial Report](#) and a copy of the most recent bank statement on file and activities/events are in accordance with GSUSA and GSEMA standards as outlined in the [Volunteer Essentials](#).

Disbanded Troop Funds Policy

Remaining money in disbanded troop funds does not belong to individual girls or volunteers and may not be refunded to them. Money may not be disbursed to another organization or charity in order to empty the treasury.

In the event that a troop disbands and the girls remain in Girl Scouts and are placed in new troops, the money left in the disbanded troop treasury will be divided per the Disbanded Troop Funds Procedures outlined below.

In the event that the troop disbands and all the girl members leave Girl Scouts, the remaining troop funds will be disbursed to the service unit treasury to be used to support Girl Scouts in that community and for new troop start-up funds.

Disbanded Troop Funds Procedures

For troops disbanding with girl members joining new troops:

- Divide the remaining troop treasury proportionately among the new troop(s) based on the number of girls remaining in Girl Scouts and moving to new troop(s).
- Send checks to each of the troop(s) treasury(s) where the girl(s) will be transferred to (this should leave a zero balance in the account).
- Ensure all outstanding transactions have been cleared before contacting the bank to close the account.
- Contact the Service Unit Coordinator and/or Service Unit Treasurer, or [Customer Care](#), to inform them that the account is closed and the treasury was divided amongst remaining girl member(s) new troop treasury(s).

For troops disbanding with no girl members staying in Girl Scouts:

- Ensure all outstanding transactions have been cleared before closing the account.
- Close the account and obtain a bank check payable to GSEMA.
- Give the check, marked with the notation “Disbanded troop #_” to the Service Unit Coordinator, Service Unit Treasurer, or a [GSEMA Volunteer Support Specialist](#).

Abandoned Troop Funds

Abandoned troop accounts will be closed by GSEMA’s Accounting Department. Remaining funds will be used by GSEMA to fund start-up costs for new troops/groups.

Fundraising Donation Pass-Throughs to Troops or Service Units

Girl Scout troops and or service units are financed by a share of money earned through Council-sponsored product program activities, additional money-earning activities, and dues. Per the GSUSA Blue Book of Basic Documents, “Adult members in their Girl Scout capacities may not solicit financial contributions for purposes other than Girl Scouting. Adults may engage in combined fundraising efforts authorized by the Girl Scout council and in which the local council is a beneficiary.” Any donation or gift directed to troops, service units or GSEMA must meet the charitable intent outlined in GSEMA’s mission and purpose as a 501(c)(3) with the IRS.

Prior to solicitation of donations or gifts of any kind, GSEMA adult members should [contact the Council](#). GSEMA is the only distinct legal entity and the only entity with tax exemption status. Therefore, donations

or gifts made to GSEMA subordinate units, including but not limited to troops and service units, must be approved by the tax-exempt entity (GSEMA) and must comply with the tax law requirements on donations or gifts for the donor to receive a charitable deduction. Solicited and/or donated funds are to be used for the specific purpose for which they were intended as long as the purpose meets the charitable intent of GSEMA's mission and purpose as a 501(c)(3) with the IRS. Volunteers are responsible for adherence to spending policies of corporate-sponsored donations or match programs. Any deviation or revision in use of donations or gifts must first be cleared with the donor. If the donor does not approve of the deviation or revision, donations or gifts will be returned to the donor.

In instances where volunteers are offered donations from individuals or businesses with the intent to support a specific troop or service unit, GSEMA may pass-through funds to the specific troop or service unit GSEMA bank account after review and approval if the below criteria are met. Donations which do not meet the requirements, will be deposited into the Council unrestricted fund to support Girl Scouting with notification to the donor.

Amount of Donation	Criteria Required to Pass-Through
All donations and gifts, including volunteer hours	<ul style="list-style-type: none"> Any donation/gift/volunteer hours directed to troops, service units or GSEMA must meet the charitable intent outlined in GSEMA's mission and purpose as a 501(c)(3) with the IRS. Volunteer Hour Donations: Caregivers, who have girl members in their household in different troops and are looking to direct volunteer hour donations from an employer to those troops as a pass-through donation, are encouraged to contact troop leaders to process requests.
\$0 to \$249	<p><i>Above plus,</i></p> <ul style="list-style-type: none"> Have an Annual Troop Financial Report on file for the prior year (unless a new troop). Participate in the GSEMA Fall Product Sale and Girl Scout Cookie Sale Programs.
\$250 to \$1,000	<p><i>Above plus,</i></p> <ul style="list-style-type: none"> Provide a donor intent form or other written communication documenting the intended use of the funds from the donor. Disclosure by the troop of how the funds will be used, including but not limited GSEMA Preliminary Application to Travel on file. Report how monies were spent to the Council within 3 months of when they were received via the online Money-Earning or Donation Funds Use Report. Disclosure of relationship between donor and troop or service unit to determine if pass-through would be harmful to GSEMA's 501(c)(3) status. Caregiver donations with girl(s) in troops will not receive a tax donation letter to cover dues or other costs (trips, tickets etc.) incurred on behalf of their girl(s) as troop members.
Donations exceeding \$1,000	<p><i>Above plus,</i></p> <p>Donors may donate up to \$1,000 per troop or service unit, per Girl Scout membership year (10/1-9/30), as a pass-through donation to that group. If that same donor wishes to give more in that membership year (10/1-9/30), any additional amount above \$1,000 could be directed to other troop(s), service units, or Girl Scouts of Eastern Massachusetts to benefit all Girl Scouts within our council.</p> <p>NOTE: Troops and service units may only receive up to \$1,000 of total pass-through donations per Girl Scout membership year (10/1-9/30). If more than \$1,000 is requested to be directed as a pass-through donation to a group within the membership year, the donor will be notified and asked to direct the funds over the limit to Girl Scouts of Eastern Massachusetts to benefit all Girl Scouts within our council.</p>

Donations to Support Highest Awards

Per the GSUSA Blue Book of Basic Documents, “Girl members may not engage in any direct solicitation for money except for Girl Scout Seniors and Ambassadors, who may solicit philanthropic donations to their councils of cash or in-kind goods for Girl Scout Gold Award projects, provided they have secured prior written permission from their council's Chief Executive Officer, Chief Development Officer, or their designee.” Girl members who are actively pursuing their Girl Scout Gold Award may solicit donations in accordance with the policies outlined above.

Letters of Acknowledgement

Letters acknowledging donations or gifts for tax reporting purposes are generated by GSEMA's Fund Development Department only. If a donor wants their donation or gift to be tax deductible, their donation or gift must be payable to GSEMA and [sent directly to the Council](#). They may request a pass-through to a specific troop or service unit in accordance with the policy outlined above.

Troops and service units may thank their supporters with phone calls, cards, etc., but no gift acknowledgement may be sent on GSEMA letterhead as it may be confused with a tax acknowledgement letter.

In-Kind Donations

Members may request in-kind donations less than or equal to \$1,000 without prior approval from GSEMA. GSEMA may provide, upon request, a letter acknowledging receipt of materials on behalf of the troop or service unit, following the completion of an in-kind donation form stating the donor, item/service, and fair market value (provided by the donor). By law, nonprofit organizations cannot determine the tax-deductible dollar value of an in-kind gift, and the tax liability for valuation of the donation is the donor's responsibility.

ADDENDUM

Addendum 1: GSEMA Criminal Background Check Policy

Where Criminal Offender Record Information (CORI), Sexual Offender Record Information (SORI) checks and a national background screening through Verified Volunteers (an online national screening for those who have not lived in MA for the past 7 years) are part of a general background check for employment, volunteer work or licensing purposes, the following practices and procedures will generally be followed:

- I. CORI checks will only be conducted as authorized by the Criminal Justice Information System (CJIS). All applicants will be notified that a CORI check will be conducted and will complete a [CORI/SORI Acknowledgement Form](#). If requested, the applicant will be provided with a copy of the Criminal Background Check Policy.
- II. SORI checks will only be conducted as authorized by applicable law and regulations of the Sex Offenders Registry Board (SORB). All applicants will be notified that a SORI check will be conducted and will complete a [CORI/SORI Acknowledgement Form](#). If requested, the applicant will be provided with a copy of the Criminal Background Check Policy.
- III. An online national criminal background check will be completed during the onboarding phase through Verified Volunteers (an online national screening for those who have not lived in MA for the past 7 years). If requested, the applicant will be provided with a copy of the Criminal Background Check Policy.
- IV. An informed review of a criminal record requires adequate training. Accordingly, all personnel authorized to review or access CORI in the decision-making process will be thoroughly familiar with the educational and relevant training materials made available by CJIS.
- V. Unless otherwise provided by law, a criminal record will not automatically disqualify an applicant. Rather, determinations of suitability based on CORI and SORI checks and the national background check through Verified Volunteers (an online national screening for those who have not lived in MA for the past 7 years) will be made consistent with this policy and any applicable law or regulations.
- VI. If a criminal record is received from CJIS or Verified Volunteers (an online national screening for those who have not lived in MA for the past 7 years), the authorized individual will closely compare the record provided by CJIS with the information on the [CORI/SORI Acknowledgement Form](#) and any other identifying information provided by the applicant to ensure the record belongs to the applicant.
- VII. If GSEMA is inclined to make an adverse decision based on the results of the CORI check, the applicant will be notified immediately in writing. The applicant shall be provided with a copy of the criminal record and Girl Scouts of Eastern Massachusetts Criminal Background Check Policy, advised of the part(s) of the record that make the individual unsuitable for the position, and given an opportunity to dispute the accuracy and relevance of the criminal record.
- VIII. Applicants challenging the accuracy of the CORI, SORI or the national background check record shall be provided a copy of CJIS's Information Concerning the Process in Correcting a Criminal Record. If the CORI/SORI record provided does not exactly match the identification information provided by the applicant, Girl Scouts of Eastern Massachusetts will make a determination based on a comparison of the CORI/SORI record and documents provided by the applicant. Girl Scouts of Eastern Massachusetts may contact CJIS and request a detailed search consistent with CJIS policy.
- IX. If Girl Scouts of Eastern Massachusetts reasonably believes the record belongs to the applicant and is accurate, based on the information as provided in section IV of this policy, then the determination of suitability for the position will be made. Unless otherwise provided by law, factors considered in determining suitability may include, but are not limited to, the following:
 - (a) Relevance of the crime to the position sought;
 - (b) The nature of the work to be performed;
 - (c) Time since the conviction;
 - (d) Age of the candidate at the time of the offense;
 - (e) Seriousness and specific circumstances of the offense;
 - (f) The number of offenses;
 - (g) Whether the applicant has pending charges;
 - (h) Any relevant evidence of rehabilitation or lack thereof;
 - (i) Any information, including information submitted by the candidate or requested by the hiring authority.
- X. Girl Scouts of Eastern Massachusetts will notify the applicant of the decision and the basis of the decision in a timely manner.

Addendum 2: GSEMA Whistleblower Policy

General

The Girl Scouts of Eastern Massachusetts (GSEMA) requires the Board of Directors, other volunteers, and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Employees and representatives of the organization must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

Whistleblower Policy

A whistleblower as defined by this policy is an employee, director or other volunteer of Girl Scouts of Eastern Massachusetts who reports an activity that they consider to be illegal or dishonest to one or more of the parties specified in this Policy. The whistleblower is not responsible for investigating the activity or determining fault or corrective measures; appropriate management officials are charged with these responsibilities.

Examples of illegal or dishonest activities include violations of federal, state or local laws; billing for services not performed or goods not delivered; reporting fraud, corruption, or other forms of lawbreaking covered by the Racketeer Influenced and Corrupt Organizations Act (RICO), the Whistleblower Protection Act of 1989, or by state whistleblower statutes; and other fraudulent financial reporting.

It is the responsibility of all Board of Directors, other volunteers, and employees to report ethics violations or suspected violations in accordance with this Whistleblower Policy.

No Retaliation

No director, other volunteer, or employee who in good faith reports an illegal or dishonest activity shall suffer harassment, retaliation or adverse employment consequence. Any individual who retaliates against someone who has reported an illegal or dishonest activity in good faith is subject to appropriate disciplinary action by the Council, including termination from the organization. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within GSEMA prior to seeking resolution outside GSEMA.

Reporting Concerns - Employees

Employees should first discuss their concern with their immediate supervisor. If, after speaking with their supervisor, the individual continues to have reasonable grounds to believe the concern is valid, the individual should report the concern as follows: Financial infractions to the Chair of the Audit Committee of the Board of Trustees; All other concerns to the Human Resources Director. In addition, if the individual is uncomfortable speaking with their supervisor, or the supervisor is a subject of the concern, the individual should report their concern directly to the Chair of the Audit Committee or the Human Resources Director.

If the concern was reported verbally, the reporting individual, with assistance from the Chair of the Audit Committee or the Human Resources Director, shall put the concern in writing. For non-financial concerns brought directly to the Human Resources Director, they will determine if the complaint should be reported to the Chair of the Audit Committee, who has specific and exclusive responsibility to investigate all concerns. If the Human Resources Director, for any reason, does not forward the concern to the Chair of the Audit Committee, the reporting individual may directly report the concern to the Chair of the Audit Committee. Concerns may also be submitted anonymously. Such anonymous concerns should be in writing and sent directly to the Chair of the Audit Committee.

Board of Directors and Other Volunteers

Board of directors and other volunteers should submit concerns in writing directly to the Chair of the Audit Committee.

Handling of Reported Violations

The Audit Committee shall address all reported concerns. The Chair of the Audit Committee shall immediately notify the Audit Committee, the Board Chair, and the CEO, of any such report. The Chair of the Audit Committee will notify the sender and acknowledge receipt of the concern within five business days, if possible. It will not be possible to acknowledge receipt of anonymously submitted concerns.

All reports will be promptly investigated by the Audit Committee and appropriate corrective action will be recommended to the Board of Directors, if warranted by the investigation. In addition, action taken must include a conclusion and/or follow-up with the complainant for complete closure of the concern.

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.

Confidentiality

Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation

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, or a violation of the Code of Conduct. 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.

Contact Information

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