

**DEPARTMENT OF TEXAS
VETERANS OF FOREIGN WARS
OF THE UNITED STATES**

**WHISTLEBLOWER PROTECTION
POLICY**



VETERANS OF FOREIGN WARS.®

Texas

2021-2022

AS APPROVED BY THE TEXAS VFW COUNCIL OF ADMINISTRATION

TEXAS VETERANS OF FOREIGN WARS WHISTLEBLOWER PROTECTION POLICY

INTRODUCTION

The Veterans of Foreign Wars, Department of Texas, is a nonprofit membership organization under the laws of the State of Texas and an affiliated organization under the National Veterans of Foreign Wars of the United States, a Congressionally Chartered non-profit organization.

VFW members, affiliated organizations (including Districts and Posts) and the general public look to the Texas VFW to provide strong leadership on veterans' issues and to develop and implement effective programs to promote patriotism, community service, youth development and a strong national defense. In order to fulfill those important responsibilities, the organization must maintain a reputation that is above reproach.

POLICY STATEMENT

This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that Texas VFW can address and correct inappropriate conduct and actions. It is the responsibility of all council members, officers, employees and volunteers to report concerns about violations of Texas VFW's code of ethics.

RESOURCES

Resources used for this policy were obtained from the National Council of Nonprofits, Sarbanes-Oxley Act of 2002, Internal Revenue Service Form 990 and instructions, Occupational Safety & Health Administration, Government Services Administration (GSA), Texas Business Occupations Code, National VFW By-Laws and Manual of Procedure, and Texas VFW By-Laws.

CONTACT FOR QUESTIONS

Dan West, State Quartermaster. Phone (512) 834-8535, ext. 102, or dan@texasvfw.org.

APPROVED BY

This Whistleblower Protection Policy was approved by the 2021-2022 Council of Administration and ratified by the State Commander on July 15, 2021.

This Whistleblower Protection Policy applies to all of the Texas VFW's staff, whether full-time, part-time, or temporary employees, to all volunteers, to all who provide contract services, and to all officers and directors, each of whom shall be entitled to protection.

WHISTLEBLOWER PROTECTION POLICY

Reporting Responsibility

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

No Retaliation

It is contrary to the values of Texas VFW for anyone to retaliate against any council member, officer, employee or volunteer who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of Texas VFW. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

Reporting Procedure

Texas VFW has an open-door policy and suggests that employees 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 State Commander. Supervisors and managers are required to report complaints or concerns about suspected ethical and legal violations in writing to the Texas VFW's State Adjutant who has the responsibility to investigate all reported complaints. Employees with concerns or complaints may also submit their concerns in writing directly to their supervisor or the State Commander.

State Adjutant/Quartermaster acts as the Compliance Officer

The Texas VFW's State Adjutant/Quartermaster is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Compliance Officer will advise the State Commander and State Judge Advocate of all complaints and their resolution and will report at least annually to the Chair of the Budget & Finance Committee/Audit Committee on compliance activity relating to accounting or alleged financial improprieties.

Accounting and Auditing Matters

The Texas VFW's State Adjutant/Quartermaster shall immediately notify the Audit Committee/Finance Committee of any 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.

Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation. Reports of Violations or suspected Violations will be kept confidential to the extent possible, with the understanding that confidentiality may not be maintained where identification is required by law or in order to enable the Organization or law enforcement to conduct an adequate investigation.

Handling of Reported Violations

The Texas VFW's State Adjutant/Quartermaster will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

RATIFICATION

Except as modified and amended by subsequent action of the Texas Veterans of Foreign Wars Council of Administration, the Whistleblower Protection Policy is hereby ratified by majority vote and confirmed in full force and effect in accordance with its terms by the 2021-2022 Council of Administration on July 15, 2021.



Norman Macey
State Commander

OFFICIAL:



Dan West
State Adjutant

