



**Buffalo
Urban League**

*Empowering Communities.
Changing Lives.*

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February 1, 2016

The Honorable Kevin R. Hardwick
Erie County Legislature, District 4
92 Franklin Street, 4th Floor
Buffalo, New York 14202

Dear Legislator Hardwick:

I am following up on the request you made during the January 28 Finance and Management Committee Meeting of the Erie County Legislature to receive a copy of the Buffalo Urban League's Whistleblower Policy. Please see the attachment.

The work of the Buffalo Urban League is critically important to our region, especially our most vulnerable children and families. We look forward to our continued work to empower individuals, support families and strengthen community.

Please do not hesitate to contact me directly with any comments or questions at bmcduffie@buffalourbanleague.org or (716) 250-2415.

Sincerely,

Brenda McDuffie
President/CEO

CC: Clerk of the Erie County Legislature

Attachment



BUFFALO URBAN LEAGUE WHISTLEBLOWER POLICY

The Buffalo Urban League is committed to maintaining a professional and ethical environment and to that end, empowers Urban League employee and/or volunteers to uphold standards and accountability through the Whistleblower Policy, which:

- Provides an avenue for employee and/or volunteers to report the activities of others that could have a negative impact on the organization, such as actions that are unlawful; that could lead to incorrect financial reporting; that are inconsistent with Buffalo Urban League policies; or that otherwise amount to serious improper conduct, for which the employee and/or volunteer has no other recourse through other procedures and;
- Protects employee and/or volunteers who report such activities in good faith from reprisals or victimization.

This Whistleblower Policy supplements the Buffalo Urban League's code of conduct. Questions and/or concerns about one's own conduct (as opposed to the conduct of others) should continue to be directed to Human Resources and/or the Buffalo Urban League Board Chair.

PROCEDURES (FOR REPORTING A VIOLATION OR SUSPECTED VIOLATION)

An employee and/or volunteer who have a question, concern, suggestion, or complaint with respect to the conduct of another employee and/or volunteer may report the conduct to one of the following:

- The Vice President responsible for Human Resources;
- The Chair of the Buffalo Urban League Board of Directors (for any/all matters);
- Outside Counsel, (only for reports concerning the conduct of the President/CEO and/or any of the VP's)

CONFIDENTIALITY

This policy encourages employee and/or volunteers to identify themselves on any such reports so to allow for full and appropriate follow-up; however, the Buffalo Urban League will investigate reports submitted anonymously, where warranted and to the fullest extent possible. Reports of violations or suspected violations will be kept confidential to the fullest extent possible and consistent with the need to conduct an adequate investigation.

Approved Buffalo Urban League Board 3.18.10

SAFEGUARDS

No employee and/or volunteer who make such a report in good faith shall suffer, as a result, any harassment, retaliation, or adverse employment or other consequence. An employee and/or volunteer who retaliates against someone who has reported a violation in good faith is subject to discipline, up to and including termination.

HOW REPORTS WILL BE HANDLED

The action taken on a report will depend on the nature of the report. Specifically, initial inquiries will be made to determine whether an investigation is appropriate, and, if so, the nature and extent of such an investigation. The Buffalo Urban League President/ CEO or the Vice President responsible for Human resources shall determine or be consulted regarding the appropriate course of action for all reports EXCEPT for those concerning themselves.

Within two (2) weeks from the date a report is made, the reporting employee and/or volunteer will receive the following information on his/her report:

- Acknowledgment that the report was received;
- Information as to whether an investigation will follow; and
- An estimate of the time for any investigation

Where appropriate, a final response will be issued to the reporting employee and/or volunteer, which may confirm that action was taken and/or the matter is closed. The extent of information disclosed in such a response will depend on the nature of the report and any legal and confidentiality issues.

Where an investigation is conducted on a report and that investigation reveals possible misconduct, the President/ CEO or Vice President shall draft and issue an investigative memo to the President/CEO, with a copy to Outside Counsel, detailing the findings of the investigation and any recommendations with respect to follow-up actions - except with respect to reports involving the President/CEO, in which case the Outside Counsel shall issue an investigative memo to the Chair of the Board of Directors, and reports involving any VP, in which case the Outside Counsel shall issue an investigative report to both the Chair of the Board of Directors and the President/CEO.

If you have any questions regarding this Whistleblower Policy or need the contact information for any of the individuals identified herein, please contact the President/CEO of the Buffalo Urban League.

The Buffalo Urban League reserves the right to modify or amend this policy at any time it deems necessary.

I have received and understand the Buffalo Urban League's Whistleblower Policy.

Employee and/or Volunteer Name (print)

Employee and/or volunteer Signature

Date

Witness Name (print)

Witness Signature

Date