

WAY OFF BROADWAY COMMUNITY PLAYERS, INC.
WHISTLEBLOWER POLICY

This Policy is intended to enable Way Off Broadway Community Players (WOBCP) representatives and others to report serious concerns within the WOBCP organization.

1. General

Way Off Broadway Community Players directors, officers, contractors, and all volunteers and cast members and crew are considered to be representatives of the organization and are expected to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As a representative of WOBCP, you are expected to practice honesty and integrity in fulfilling your responsibilities and comply with all applicable laws and regulations. Failure to uphold these standards may seriously harm the reputation of our theater company and could potentially damage it financially.

2. Reporting of Violations

WOBCP has an open door policy and encourages directors, officers, contractors, and all volunteers to share their complaints or concerns with someone who can address them properly. In most cases, this will be the production's director or the Front of House supervisor. However, if not comfortable speaking with these individuals, please contact any member of the Oversight Committee, all of whom are authorized to act as Compliance Officers. The director or Front of House supervisor and any other supervisor or board member who receives the complaint is required to report suspected ethics violations to a Compliance Officer. In the event that a Compliance Officer is involved in the complaint, inform any member of the Board of Directors immediately. Crimes against persons or property, such as assault, rape, burglary, etc. will be reported immediately to the appropriate law enforcement agency.

3. No Retaliation

No person who, in good faith, makes a report in compliance with Article 2 shall suffer harassment, retaliation, or any other adverse consequence. Anyone who retaliates against someone who has reported a possible violation in compliance with article 2 above is subject to discipline up to and including removal or termination. If necessary, WOBCP and its members will cooperate fully in any law enforcement investigation.

4. Compliance Officers

Members of the Oversight Committee are all authorized Compliance Officers. If needed, the Chair of the Oversight Committee may appoint additional Compliance Officers, who will serve either for special purposes or full time, per the appointment. Compliance Officers are responsible for ensuring that the treatment of all complaints is done in compliance with this policy.

Each production will have one or more Compliance Officers assigned to it by the Chair of the Oversight Committee. The assigned Compliance Officer shall go over this Whistleblower Policy, the Director's Agreement, the Stage Manager's Agreement, and the Cast and Crew Agreement with the members of the production and shall sign as a witness on the individual agreements. The assigned Compliance Officer will attend one or more rehearsals.

5. Acting In Good Faith

Any good faith report, concern, or complaint is fully protected by this policy. This is true even if the report, concern, or complaint is, after investigation, not able to be substantiated. Anyone filing a report concerning a violation or a suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the law, ethical, safety, or good business standards, or WOBCP's policy. Anyone who makes an allegation that proves not to be substantiated AND which appears to have been made negligently, frivolously or maliciously or with knowledge that it was false will be subject to discipline, up to termination of all relations with WOBCP or other legal means to protect the reputation of WOBCP and its directors, officers, contractors, cast and crew, and volunteers.

6. Confidentiality

Violations or suspected violations can be submitted to a Compliance Officer on either a public or a confidential basis by the complainant. They may also be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the fullest extent possible, consistent with the need to conduct a full and impartial investigation. The identity of the complainant, if known, shall remain confidential to those persons directly involved in applying this policy unless otherwise required by law.

7. Handling Of Reported Violations

Upon receipt of a complaint, the Compliance Officer shall immediately investigate the basis for the complaint and determine if they have enough information and evidence to proceed. If further investigation is needed, it will be conducted immediately. Substantiated complaints will be reported to both the Chair of the Oversight Committee (or another Oversight member if the Chair is acting as the Compliance Officer or is involved in the complaint) and to the Board President (or to the Board Vice President if the President is involved in the complaint). The Chair of the Oversight Committee and the Board President shall appoint an individual or individuals to perform the final investigation. The initial Compliance Officer may be one of those appointed. As soon as reasonably possible, the investigating individual(s) shall submit a written report clearly documenting the facts and results of the investigation, including any recommended disposition/resolution, to both the Chair of the Oversight Committee and the Board President. The Board shall have final review and approval of the resolution. Board members directly involved with or having a conflict of interest in the investigation are required to recuse themselves and shall not be privy to or participate in the investigation. After the Board has reached a decision, the complainant and the investigated individual shall both be notified in writing of the resolution. That can be done either via letter or email.

Investigations under this policy are confidential and information shall be restricted to the appointed investigators, the Board of Directors, and the Chair of the Oversight Committee during the investigation. Attempts by the complainant, the investigated individual, or any other party to resolve a complaint through discussion with Board members or by disclosing evidence that was not disclosed to the investigation is discouraged .

8. Reporting

The Chair of the Oversight Committee shall make an annual report to the Board of Directors on any compliance activity during the preceding year at the last Board Meeting before the Annual General Meeting.

Adopted by the WOBCP Board this _____ day of _____, 2021

By _____
President of the Board