



**Les Dames d'Escoffier**  
INTERNATIONAL  
Washington D.C. Regional Chapter

# Whistleblower Policy

Approved by the Board of Directors on Oct. 19, 2023

Les Dames d'Escoffier International's Washington, D.C. Regional Chapter ("Chapter") requires Officers, Directors, and Members to observe high standards of ethics and fulfill obligations to the best of their ability in the conduct of their duties and responsibilities. We understand, however, that despite our best efforts, concerns may arise. This policy addresses how to raise them and how they will be handled.

## **Reporting**

The Chapter encourages everyone to report complaints about or injuries from illegal practices or serious violations of Chapter Bylaws, Standing Rules, or Policies, including illegal or improper conduct by any Chapter member, its leadership, employees, or others acting on its behalf. If you believe an impropriety, such as financial malfeasance, an ethical violation, or illegal practice has occurred, please report it to either the President, First Vice President Membership or Parliamentarian. If an Officer (or Parliamentarian) is able to rectify the concern, she should notify the Board about corrective actions taken. If she is unable to rectify the concern, she is required to promptly bring the complaint before the Board of Directors, which will determine whether a full investigation is needed. Appropriate corrective action will be taken if warranted by the investigation. If necessary, the Board will consult legal counsel.

## **No Retaliation**

It is contrary to the values of the Chapter for anyone to retaliate against any member, Officer, Director, employee, or outside entity who in good faith reports a potential ethics violation or a suspected violation of law. Anyone who retaliates against someone who has reported a violation in good faith is subject to disciplinary action, including possible termination of membership.

## **Confidentiality**

Violations or suspected violations may be submitted on a confidential basis by the complainant. Please be specific in detailing the grounds for the complaint, including specific actions, dates, and supporting documents if possible. To protect the privacy of all parties involved, reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation. Information submitted in a complaint may need to be shared with Officers and Directors in the course of investigating a complaint and/or taking corrective action.

## Good Faith

Anyone filing a 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 to be unsubstantiated or made maliciously or knowingly to be false will be viewed as a violation of the membership commitment.

This policy was based on information from the following resources:

- Jason Qu, senior managing attorney, D.C. Bar Pro Bono Center's Nonprofit and Small Business Legal Assistance Program
- Jacqueline A. Henson, Esq., at Baker, Donelson, Bearman, Caldwell & Berkowitz, P.C., LDEI's outside legal counsel
- LDEI Whistleblower Policy
- National Council of Nonprofits Sample Whistleblower Protection Policy  
<https://www.councilofnonprofits.org/files/media/documents/2023/sample-whistleblower-protection-policy.pdf>
- DC Bar Pro Bono Center Whistleblower Policies <https://www.lawhelp.org/files/7C92C43F-9283-A7E0-5931-E57134E903FB/attachments/B2D746C6-B926-A6C3-DC91-9D2D7233A7AA/whistleblower-policy-alert-2017-update-final.pdf>
- Independent Sector Principles for Good Governance, Establishment of Whistleblower Policy  
<https://independentsector.org/wp-content/uploads/2022/03/Principles2018-Final-Web.pdf#page=15>