



2023 SEATTLE CASCADES WHISTLEBLOWER POLICY

1 PURPOSE

The Northwest Youth Music Association (NYMA), while operating the Seattle Cascades Drum & Bugle Corps (Seattle Cascades) requires staff, volunteers, and members to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Representatives of the Seattle Cascades must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable policies, laws, and regulations.

While we hope that all those who come in contact with our organization feel unhindered and unthreatened in raising concerns, we recognize that it is essential to also provide for confidential and anonymous reporting of such concerns to ensure our Executive Leadership Team is given full visibility and the opportunity to investigate and address any potential violations of policy, law, or regulation in the conduct of the Seattle Cascades activities.

Accordingly, the purpose of this Whistleblower Policy is to establish policies and procedures for:

- a) The submission of concerns regarding harassment or abuse, questionable accounting practices, questionable business ethics, conflicts of interest, acceptance, provision, or solicitations of bribes or kickbacks, legal and regulatory violations, or unsafe practices or activities by staff, volunteers, members and other the Seattle Cascades stakeholders. on a confidential and anonymous basis.
- b) The receipt, retention, and treatment of complaints received by the Seattle Cascades regarding harassment or abuse, accounting, internal controls, conflicts of interest, acceptance, provision, or solicitations of bribes or kickbacks, legal or regulatory violations or unsafe practices or activities.
- c) The protection of directors, volunteers, members and their families, and staff reporting concerns from retaliatory actions.

2 REPORTING YOUR ISSUES AND CONCERNS

NYMA is committed to taking all reasonable steps to prevent harassment and unethical, illegal or unsafe conduct and will make every reasonable effort to promptly and completely address and correct any such conduct that may occur. However, NYMA cannot take prompt and effective remedial action unless everyone assumes the responsibility of reporting such behavior immediately to the appropriate individual.

Every report made will be investigated promptly and impartially, with every effort to maintain confidentiality. At the conclusion of this investigation, if NYMA believes any policies have been violated or laws broken, it will take appropriate corrective and remedial action, up to and including notification of law enforcement, discharge of offending instructors, staff and/or similarly appropriate action towards offending vendors, volunteers, or members.

2.1 RESPONSIBILITY TO REPORT

As a condition participation, each staff member, volunteer, and member of the Seattle Cascades has an obligation to report, in accordance with this Whistleblower Policy:

- a) Any form of harassment, bullying or abuse, questionable accounting practices, questionable business ethics, conflicts of interest, acceptance, provision, or solicitations of bribes or kickbacks, legal or regulatory violations, unsafe practices or other inappropriate or prohibited activities by staff, volunteers, members or other Seattle Cascades stakeholders, and
- b) violations and suspected violations of the Seattle Cascades Youth Protection Policy, Member Handbook or other Published Seattle Cascades Policy or Procedure. Reports can be made to any member of the Executive Leadership Team or through other designated reporting channels established in this Policy. All such reports will be handled in accordance with the procedures and requirements set forth in this Policy.

ANYONE WHO BELIEVES THAT SHE OR HE HAS BEEN SUBJECTED TO UNLAWFUL HARASSMENT OF ANY KIND HAS THE RESPONSIBILITY TO REPORT THE HARASSMENT IMMEDIATELY.

2.2 REPORTING WITHOUT FEAR OF RETALIATION

NO ONE ASSOCIATED WITH NYMA OR THE SEATTLE CASCADES WILL BE RETALIATED AGAINST FOR REPORTING HARASSMENT. THIS NO-RETALIATION POLICY APPLIES WHETHER A GOOD FAITH COMPLAINT OF HARASSMENT IS WELL FOUNDED OR ULTIMATELY DETERMINED TO BE UNFOUNDED.

2.3 CONFIDENTIALITY

All reports made through any channel are considered confidential and private. We do not publicly disclose the details of any Report, Investigation or Corrective Action. All Reports, Investigations and Corrective Actions are reviewed by the Board of Directors in Closed Session. Only anonymized summary information appears in the Board's published Meeting Minutes.

However, Seattle Cascades may be compelled by law or policy to notify and/or disclose specific information to other organizations, agencies or law enforcement. There is no guarantee of confidentiality under these circumstances.

For example, if you report an issue involving another drum corps, we are going to contact DCI and that organization as part of investigating and resolving your issue. If you report an issue that constitutes illegal behavior, we are required to notify the appropriate law enforcement agency.

The following methods are the recognized channels for reporting an issue within the NYMA / Seattle Cascades organization.

2.4 REPORTING IN PERSON

2.4.1 Direct Reporting

You are encouraged to **bring concerns and issues directly to any member of the corps Executive Leadership Team**. These individuals are obligated by the Board of Directors to investigate all issues brought to their attention, and to take appropriate corrective action when and where necessary.

The Executive Leadership Team consists of the Corps Director, Tour Director and all members of the Board Directors. **At least one of member of this team will always be on-site at any NYMA or Seattle Cascades sanctioned event**. While on tour, the "Officer of the Day" (OOD) and their contact information will be posted on the common schedule located in the Food Services area.

2.4.2 Indirect Reporting

You may choose to bring an issue to the attention of your Caption Supervisor, Senior Staff, Educational Director, or any member of the Student Leadership Team (Drum Majors, Section Leads, Horn Sergeant). **Staff, Volunteers, Admins, Directors and Student Leadership are obligated to promptly report your issue or concern to the Executive Leadership Team**. The investigator may request to speak with you in a confidential setting, or ask that you answer additional questions to aid us in validating your claims and taking corrective actions where warranted.

If you are uncomfortable reporting the potential harassment in person, there are two other channels available as described below.

2.5 REPORTING ONLINE

To ensure that anyone affiliated with the Seattle Cascades has the ability to confidentially report concerns, complaints and issues, we have published a public Whistleblower page on our website, enabling anyone to report issues directly to the Executive Leadership Team. You may also choose to send us an e-mail directly, and not use the online submission form. This capability is featured prominently on our website as is our Whistleblower Policy.

2.5.1 VIA EMAIL

You may choose to send an e-mail to whistleblower@seattlecascades.org to report your issue. Unless you use a throw away account or anonymous e-mail service, reporting via **this method is not anonymous.**

2.5.2 VIA WEB BROWSER

Visit <https://seattlecascades.org/whistleblower>.

This page provides instructions, guidance and a form for submitting your complaint and explains the procedures that will be followed once it is received by our Executive Leadership Team. **You may choose to remain anonymous using this form by not providing your name or e-mail address.**

2.6 ABOUT REPORTING ANONYMOUSLY

While the Seattle Cascades hope that all those who come in contact with the our organization feel unhindered and unthreatened in raising concerns, we recognize that it is essential to also provide for confidential and anonymous submission of such concerns to ensure our Board of Directors has a full opportunity and visibility to investigate and address any potential violations of policy, law, or regulation in the conduct of the Seattle Cascades activities.

The form located at <https://seattlecascades.org/whistleblower> allows anonymous submissions. You are not required to provide an e-mail address, and there is no way for us to determine your identity unless you choose to reveal other identifying information in the text of the complaint itself.

We value and respect your privacy and take all claims seriously. In order to help with our investigation please try to provide enough detail in your claim to allow an independent investigation to occur. For example, it is helpful to know when the event happened and if you spoke with anyone else regarding your experience.

If you choose to remain anonymous, we are unable to ask you any follow up questions and can only investigate based on the information you provide.

2.7 REPORTING TO AN INDEPENDENT AGENCY

2.7.1 Report Sexual Harassment or Abuse to RAINN

<https://rainn.org> or +1 800 656-HOPE

RAINN (Rape, Abuse & Incest National Network) is the nation's largest anti-sexual violence organization. RAINN created and operates the National Sexual Assault Hotline, in addition to operating the DoD Safe Helpline for the Department of Defense. Support specialists are available by phone (+1 800 656-HOPE) and online chat in English and Spanish. The service is free, confidential, and available 24/7. The telephone hotline is operated in partnership with 1,000 local service providers.

2.7.2 Reporting to Drum Corps International

To report an ethics concern or alleged noncompliance, or to seek support from a DCI staff member in reporting such an issue, please email your concern to ethics@dcf.org, or fill out the online form at <https://www.dci.org/static/ethics-and-compliance-reporting>

For reports submitted with a means of contact, a DCI staff member will reach out to you within 5 business days to discuss options and resources that may be available to you.

3 AUTHORITY TO INVESTIGATE

3.1 OBLIGATION TO INVESTIGATE ALL REPORTS

The **Executive Leadership Team**, composed of all Officers and Directors of the NYMA Board of Directors (Board), the Seattle Cascades Executive Director and the Seattle Cascades Tour Director are obligated under this policy to investigate all reports, promptly report all investigations to the Board of Directors, and take corrective actions where necessary.

Any investigation that uncovers evidence of suspected illegal behavior shall be promptly turned over to the appropriate law enforcement or regulatory agency. Evidence of activities that are suspected to violate Drum Corps International policies or procedures shall be escalated through the appropriate channels, as defined by Drum Corps International.

3.2 AUTHORITY TO RETAIN INDEPENDENT INVESTIGATORS

The Board, upon recommendation of the appropriate Board committee or other designee, has the authority to retain such outside investigators and experts as it deems necessary or appropriate to assist with any investigation or any other acts associated with the issues or concerns raised.

3.3 PROCESS REQUIREMENTS

Each investigation is unique, and the specific steps required to resolve or correct the situation are determined by the nature and specifics of the claims. However, all investigations must contain the following basic elements:

- a) All reports of concerns must be investigated promptly, and the individual making the report (if not anonymous) will be notified of receipt of reports submitted on-line or via e-mail no later than 7 days submission.
- b) The Investigator must deliver a written report to the Board referencing any evidence collected, conclusions and recommendations for any corrective or follow up action. Follow up with the complaining party shall be considered in consultation with appropriate legal counsel. **If there are urgent recommendations for corrective action, the Investigator will convene an Emergency Board of Directors Meeting (Closed Session) to review and approve those actions,** otherwise the report will be reviewed at the next scheduled Board Meeting.

Reports, investigations, reports of investigations, and any follow up will be maintained as confidential as reasonably possible.

4 ACKNOWLEDGMENT

I have read and agree to be bound by this policy. I understand that failure to follow any aspect of this policy may result in my termination or separation from the organization.

SIGNED

PRINTED NAME

DATE

TO BE SIGNED BY PARENT/GUARDIAN IF THE PARTICIPANT IS UNDER 18 YEARS OF AGE

As a Parent or Legal Guardian of the minor referenced below I have read and agree to be bound by all aspects of this policy on behalf of my minor child.

NAME OF MINOR: _____ AGE OF MINOR _____

NAME OF PARENT OR GUARDIAN: _____

SIGNATURE OF PARENT OR GUARDIAN _____ DATE: _____