Allegany County Land Bank
6087 State Route 19N, Suite 300
Belmont, NY 14813
585-268-7080
alleganycountylandbank@gmail.com

WHISTLEBLOWERS AND PROTECTION FROM RETALIATION POLICY

Definitions of Protected Activity

Employees who engage in activities protected by anti-discrimination laws, including Title VII of the 1964 Civil Rights Act, the Americans with Disabilities Act, the Age Discrimination in Employment Act, and the Equal Pay Act, and all other state anti-discrimination statutes are protected from retaliation. This activity includes employees who reasonably communicate the belief that the agency's practice constitutes unlawful employment discrimination; an employee who refuses to obey an order based on reasonable and good faith belief that the practice is unlawful; an employee who files an administrative charge with the Equal Opportunity Employment Commission or analogous state agency; or an employee who testifies, assists or participates in any other way in an investigation, proceeding, hearing or litigation brought under an anti- discrimination law.

A Whistleblower, defined as an employee who reports an activity that he or she believes is illegal or dishonest in violation of federal, state or local laws and/or agency policy; billing for services not performed or for goods not delivered and other fraudulent financial reporting, is also protected from retaliation under this policy.

Definitions of Retaliation

Allegany County Land Bank Corporation (ACLBC) is committed to protecting all employees' access to their rights without fear of retaliation. Retaliation may include a negative employment action such as a demotion, termination, threat, reprimand, harassment or other adverse treatment that is brought against the employee for engaging in any protected activity.

Complaint Procedures

Employees are encouraged to report concerns regarding discrimination, retaliation, harassment or any activity that the employee reasonably and in good faith feels to be illegal or dishonest to the attention of management staff as soon as possible. Complaints may be written or verbal and should be made to the Land Bank Board Chairman. If the employee does not feel comfortable going to the Board Chairman, then the complaint should be taken to the Audit Committee Chairman. There is no time limit for making a complaint, but every effort should be made to initiate the complaint as soon as possible while facts and potential testimony of witnesses are fresh.

Investigation

All complaints will be investigated in an impartial manner as soon as possible, but will commence no later than within ten (10) working days of when the complaint was made. Confidentiality of the person filing the complaint will be protected as much as possible. However, identity may have to be disclosed to conduct a thorough investigation, to comply with the law, or to provide accused individuals with their legal rights of defense.

Resolution

Allegany County Land Bank
6087 State Route 19N, Suite 300
Belmont, NY 14813
585-268-7080
alleganycountylandbank@gmail.com

The Land Bank will take immediate and appropriate remedial action that is necessary to end the alleged discrimination, harassment or retaliatory activity, including discipline. Any employee determined to have engaged in such behavior will be subject to disciplinary action, up to and including termination from employment. To the extent possible, employees who file a complaint of harassment, retaliation, discrimination or activities that fall under the Whistleblower definitions will be informed of the outcome of the investigation.

Distribution of Policy

A copy of this policy is required to be, and shall be, distributed to all directors, officers, employees and to volunteers who provide substantial services to the corporation.