UWNEK Compliance Policy

Adopted: November 2020

**PURPOSE**

This policy defines the terms and procedures by which UWNEK will ensure its programs and operations and the actions of its employees are following UWNEK-adopted policies.

**GENERAL**

Policy compliance is assured through:

1. Regular, periodic, methodical review of policies to verify compliance. These reviews will validate compliance and relevance of each policy. Findings will recommend changes to policies as appropriate or provide recommendations corrective actions to UWNEK leadership.
2. Responsive investigation, of complaints or other issues regarding whether UWNEK is, in fact, operating in compliance with policies or whether UWNEK policies and procedures provide effective support to UWNEK employees, programs and the broader UWNEK mission.

**RESPONSIBILITIES**

1. Executive Committee. The Executive Committee will designate a Compliance Officer, for approval by the Board of Directors, to implement this policy.
   1. The Compliance Officer will be chosen from among the members of the Executive Committee. OR
2. The Compliance Officer will be chosen from among the members of the Board of Directors and will be an ex officio (non-voting) member of the Executive Committee.

(Ed. Note: The intent of this method of selecting the Compliance Officer is to give him/her visibility of all the decision-making actions of UWNEK, including those of the Executive Committee. This will allow him/her to be aware, and provide input as appropriate, of the policy implications of decisions as they take place. Another alternative would be to have the Compliance Officer be chosen from among the Board members but not be a member of the Executive Committee or regularly attend Executive Committee members. Another alternative could be to assign Compliance Officer responsibilities to one of the staff as an additional duty – potential salary implications?).

1. The Compliance Officer will submit all policy reviews, investigations, and all findings to the Executive Committee for review and forwarding to the Board of Directors for information.
2. The Executive Committee will act on all recommendations for action, modifying them and forwarding them to the Board of Directors for approval as appropriate.
3. The Compliance Officer will coordinate the annual policy review schedule with the CEO and publish it on the UWNEK activities calendar.
4. The CEO will assign employees to assist policy reviews and investigations, provide access to files and records, etc. as requested by the Compliance Officer.

**ANNUAL REVIEW OF POLICIES**

Annually, the Compliance Officer will review all UWNEK policies for relevance, applicability and to verify that UWNEK is operating in compliance with its policies. To minimize the workload of this review, the schedule for review of policies will be distributed across the year. See Responsibilities above.

**INVESTIGATION OF COMPLAINTS OR ISSUES ARISING FROM CONFLICT OR APPARENT CONFLICT BETWEEN POLICY COMPLIANCE AND PROGRAM EXECUTION.**

The Compliance Officer performs an “ombudsman” role to support employees, volunteers, and smooth operation of UWNEK by investigating complaints or other issues arising from conflict or apparent conflict between policy compliance and program execution.

Such issues may be referred to the Compliance Officer for investigation by the Executive Committee, the CEO, or the President of the Board of Directors.

In exceptional circumstances, issues may be raised directly to the Compliance Officer by employees or volunteers or members of the Board. In such case, the Compliance Officer will, at his/her discretion, inform the CEO or the President of the Board of Directors and proceed according to their guidance.

In all such cases the Compliance Officer will submit the results of his/her review, together with finding and recommendations to the Executive Committee for their review and forwarding to the Board of Directors as appropriate. See Responsibilities above.

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Board President Date