

**DEPARTMENT OF WASHINGTON
VETERANS OF FOREIGN WARS
OF THE UNITED STATES**

WHISTLEBLOWER POLICY



2025-2026

AS APPROVED BY THE WASHINGTON VFW COUNCIL OF ADMINISTRATION

Rev 5/12/2025

Veterans of Foreign Wars (VFW), Department of Washington

Standard Operating Procedure (SOP): Handling Whistleblower Complaints

1. Purpose

This SOP establishes procedures for reporting, documenting, and responding to whistleblower complaints within the VFW Department of Washington. It aligns with best practices and the principles outlined in the Washington State Whistleblower Protection Act (RCW 42.40), as applicable to nonprofit organizations.

2. Scope

This procedure applies to all employees, officers, volunteers, and members of the VFW Department of Washington who report concerns of misconduct or improper actions within the organization.

3. Definitions

Whistleblower: A member, employee, or volunteer who reports misconduct or suspected unethical behavior in good faith.

Improper Conduct: Includes but is not limited to:

- Fraud or misuse of VFW funds or resources
- Violation of VFW bylaws or policies
- Abuse of authority or power
- Serious violations of applicable laws or regulations
- Endangerment of public health or safety
- Falsification of official records
- Conflicts of interest
- Unauthorized disclosure of confidential information

Retaliation: Any adverse action (e.g., termination, demotion, threats, or harassment) taken against a whistleblower for making a report in good faith.

4. Responsibilities

- Post, District, and Department Leadership: Must take all whistleblower reports seriously and ensure they are escalated appropriately.
- Whistleblower Coordinator: The Department Adjutant, Assistant Adjutant, or a designated Department Line Officer shall serve as the Whistleblower Coordinator. The appointment must be made in writing by the Department Commander annually.
- Department Officers: May be involved in oversight or resolution, depending on the nature of the allegation.
- Legal Advisor (if applicable): Consulted as necessary on matters involving legal or compliance risk.

5. Procedure

5.1 Reporting

Reports may be submitted via:

1. Email or letter to the Department Adjutant
2. Anonymous written reports mailed to Department Headquarters

Reports should include a description of the conduct, individuals involved, and any supporting documentation.

If the complaint involves the Department Adjutant or Assistant Adjutant, reports must be submitted directly to the Department Commander.

If the complaint involves all parties named above, the report may be submitted directly to the Department Senior Vice Commander.

5.2 Confidentiality

The identity of the whistleblower shall be kept confidential to the maximum extent possible. Disclosure is limited to those with a need to know for the purpose of investigation or compliance with legal obligations.

5.3 Review and Investigation

A preliminary review shall be conducted within 15 days of receipt by the Whistleblower Coordinator or a neutral party appointed by the Department Commander.

A formal investigation shall be initiated if warranted.

Investigations should be completed within 60 days, unless an extension is granted with written notice to the Department Commander.

Findings shall be submitted to the Department Commander via the Adjutant or directly if the Adjutant is implicated.

5.4 Retaliation Protection

Retaliation is strictly prohibited.

Any suspected retaliation will be treated as a separate violation and investigated accordingly.

Disciplinary action may be pursued in accordance with Article IX of the VFW National Bylaws.

5.5 Recordkeeping

All records related to whistleblower complaints shall be securely maintained by the Department Adjutant for a minimum of seven (7) years. Records shall be made available to authorities upon legal request.

6. Training and Communication

This SOP shall be made available to all members and staff.

Department Officers and key personnel shall receive annual training on whistleblower protections and procedures.

7. Oversight and Reporting

An annual summary of whistleblower complaints (excluding identifying details) shall be presented to the Department Council of Administration for transparency and oversight.

8. References

- Washington State Whistleblower Protection Act (RCW 42.40)
- VFW National Bylaws and Manual of Procedure
- IRS Whistleblower Office Guidelines (for applicable tax violations)
- Nonprofit Risk Management Best Practices

9. Revision History

Date	Description of Change
05/12/2025	Initial version adopted