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## High Way Education, Inc Whistleblower Complaint Policy

High Way Education, Inc, d/b/a Turkish Cultural Center Rochester (TCC), is a non-profit 501(c)(3) organization and its operating budget is comprised mostly of financial contributions, and donations. TCC has an open-door policy, and encourages volunteers, employees, and community members to report any conduct that the individual believes constitutes violation of a law or policy.

Complaints must be submitted to the Executive Director and/or Board Chair in writing, and must contain the following information:

- Concise facts about the situation prompting the complaint. (Hearsay is not considered appropriate evidence but may prompt further investigation.)
- Date and time of incident(s).
- Individual(s) involved.
- Possible resolution suggestions.

The Board Chair will be notified of all complaints; the Board Chair will notify the full Board. The Board will act as the Compliance Officer as suitable to the complaint.

Within ten (10) business days after receipt of the complaint the Executive Director or Compliance Officer will respond to the complainant in writing acknowledging receipt of the complaint.

If circumstances require it, the Compliance Officer will conduct a review or an investigation of the situation. An investigation plan of action may take up to 30 business days to develop. Following the review/investigation, the Executive Director or Compliance Officer will respond in writing to the complainant.

Any resolution, as determined by the Compliance Officer, will include a plan to remedy any action or inaction that was discovered during an investigation. The Executive Director's or Compliance Officer's decision shall be final. The Board Chair, or Board designee, will monitor progress to remedy the action or inaction to assure compliance.

After resolution of the complaint, if the situation the complainant reported continues, the complainant will be encouraged to report this to the Board Chair or other designee as appropriate. This step should be taken within ten (10) business days after the Executive Director or Compliance Officer has given his/her decision, or within ten (10) business days after a subsequent incident occurs that gave rise to the original complaint, whichever is later.

Whistleblower complaint documentation will be kept on record.