

The Brooklyn Hospital Center

Human Resources Policy and Procedure Manual

Subject: NON-RETALIATION

Policy: HR I-6

A key element of the TBHC Compliance Program is the ability of employees to express problems, concerns, or opinions without fear of retaliation or reprisal. At the same time, employees have an affirmative duty to report issues or concerns that come to their attention through appropriate channels.

The Brooklyn Hospital Center will not take any retaliatory personnel action against an employee because the employee does any of the following:

- discloses or threatens to disclose to a supervisor, to hospital management, or to a public body an activity, policy, or practice of the hospital that is in violation of law, rule, or regulation which would create a substantial and specific danger to the public health or safety, or which constitutes health care fraud, or improper quality of patient care;
- provides information to or testifies before any public body conducting an investigation, hearing, or inquiry into any such violation;
- objects to or refuses to participate in any such activity or practice in violation of a law, rule or regulation.

Retaliation in any form against an individual who in good faith reports possible unethical or illegal conduct is strictly prohibited and is a serious violation of the hospital's Compliance Program. Acts of retaliation should be reported immediately to Human Resources and to the Compliance Officer.

Managers should maintain an environment whereby employees feel comfortable raising issues or asking questions. Managers should also take appropriate steps to address concerns that are raised and communicate the results of corrective action wherever possible or appropriate.

Employees who have reason to believe that an action of the hospital or of any of its employees constitutes a threat to public health or safety, health care fraud, or improper quality of patient care have a duty to report such a concern to the management of the hospital. Appropriate channels for reporting such concerns include the following:

- Employee's department head
- Any member of senior management
- Human Resources Department
- Compliance Officer
- Risk Management Department
- The confidential compliance help line, available 24 hours a day, at 1-866-420-3438, or online at www.tbhc.ethicspoint.com.

PROCEDURES:

Employees should inform Human Resources or the Compliance Officer of any incident of retaliation.

Human Resources shall be responsible for the prompt investigation of any allegation of retaliation. The Senior Vice President of Human Resources will inform the Compliance Officer of any such allegation, and they will work together to ensure that the allegation is investigated and appropriately responded to.

Approved:

Effective: 6/2/08
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