



**DENVER
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Non-Retaliation

Principle:

Denver Health and Hospital Authority (DHHA) is committed to promoting ethical behavior and acting in accordance with applicable federal, state and local laws. In accordance with DHHA's Code of Conduct and related policies, procedures, guidelines, standards, principles and practices, DHHA expects employees to inform the appropriate parties if they have observed unethical, illegal or suspicious activity. The purpose of this policy is to reiterate DHHA's prohibition on retaliation against employees who report, oppose, seek guidance or participate in investigations regarding ethical or compliance concerns. Reports must be made in good faith. Good faith does not mean that the individual needs to be right, but it does mean that the individual is making the report without malice and with an honest belief that the information provided is truthful based on existing information.

References:

[HR Employee Principles & Practices, Employee Counseling/Accountability Based Performance](#)

Practice:

Prohibition Against Retaliation

1. Supervisors and DHHA leadership are responsible for creating an environment where team members are encouraged to report their concerns and ask questions without fear of retaliation.
2. Retaliation is any action, statement or behavior that is designed to punish an individual for opposing an unlawful act, filing a compliance report, cooperating with an internal or external investigation, seeking guidance regarding a compliance concern or deter one from taking such action. Retaliatory conduct includes, but is not limited to, harassment, intimidation, adverse action against an employee regarding the terms and conditions of employment, such as termination, demotion, or suspension, as well as related threats of such actions.
3. Supervisors, managers, and employees are not permitted to engage or threaten to engage in retaliation, retribution or any form of harassment directed against an employee who reports an ethical or compliance concern in good faith, opposes an unlawful act, seeks guidance on compliance issues or who cooperates in an investigation involving a suspected violation.
4. Employees may not engage in retaliation against a patient, provider, DHHA Medical Plan member, or any

other DHHA employee for filing a patient privacy violation complaint. In addition, employees may not take any action to cause such individuals to waive their right to file a patient privacy violation complaint.

Reporting and Investigations

1. Employees who believe they have been retaliated against in violation of this policy should promptly report the issue by contacting their supervisor, manager, the Human Resources Department, the Enterprise Compliance Services in person or by calling 303-602-3255 for DHHA matters or 303-602-2004 for DHMP matters. Employees may also choose to contact the Denver Health ValuesLine by calling 1-800-273-8452 or completing a web report at <http://www.denverhealth.ethicspoint.com>. It is important to file the report of retaliation as soon as possible after the occurrence as delay can impact the effectiveness of the investigation.
2. All reported allegations of retaliation will be fully investigated including, but not limited to, assessing the credibility of each reported concern to establish that it has been made in good faith. "Getting even" behavior such as making false or deceptive reports with the intent to harm DHHA or its employees is not tolerated.

Violations

1. Any individual who is involved in retaliation, retribution or harassment in violation of this policy is subject to disciplinary action, up to and including termination of employment even on the first offense.
2. Any individual who fails to act in good faith in connection with reporting a compliance concern or in cooperating with an investigation regarding a compliance concern shall also be subject to disciplinary action, up to and including termination of employment even on the first offense.

Attachments

No Attachments

Approval Signatures

Step Description	Approver	Date
	Michelle Fournier Johnson: Chief Human Resource Officer	04/2018
	Sherry Stevens: Associate Chief HR Officer	04/2018
	Karen McTavish: Sr. Assistant General Counsel	04/2018
	Sheila Paukert: Associate Chief HR Officer	04/2018

Applicability

Denver Health (DHHA), Denver Health Human Resources (HR)