



Subject:
Non-Retaliation Policy

Office of Compliance and Integrity

Policy level: I

Policy Number:

HHC-C04

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Approval Date:
June 19, 2017

Purpose:

To promote the conduct of business with integrity and in compliance with applicable laws and regulations and to provide a method for reporting Wrongful Conduct.

Scope:

This Policy applies to the HHC Community.

Policy:

Everyone in the HHC Community is required to report actual or suspected Wrongful Conduct. Anyone who makes a Good Faith report of suspected Wrongful Conduct will not be subjected to Retaliation for the act of reporting. Reports should be made to a supervisor, a member of the Office of Compliance and Integrity ("OCI"), a member of the Human Resources Department or other appropriate HHC personnel. Reports can also be made

to the HHC ComplianceLine. Anyone who makes a report may request to be anonymous. In such cases, the reporter's identity will not be revealed unless disclosure is required by law, subpoena, or other legal process.

Employees cannot exempt themselves from the consequences of personal wrongdoing by reporting their own misconduct.

Any communication that proves to have been both unsubstantiated and made with malice or with knowledge that it was false is not protected by this policy. This policy also protects individuals from false allegations of Wrongful Conduct.

Anyone who conducted or condoned Retaliation in response to a Good Faith report of suspected Wrongful Conduct will be subject to disciplinary action, up to and including termination.

Guidelines:

1. Anyone making a report of Wrongful Conduct must be acting in Good Faith and have reasonable grounds for believing the information reported indicates potential Wrongful Conduct.
2. Anyone who knowingly or with reckless disregard for the truth gives false information or knowingly makes a false report of Wrongful Conduct or a subsequent false report of Retaliation will be subject to disciplinary action, up to and including termination. Allegations that are not substantiated and are made in Good Faith are not subject to corrective action.
3. No individual who makes a Good Faith report will be subjected to Retaliation. Any person who retaliates against any individual who makes such a report is subject to discipline up to and including termination. This policy is intended to enable HHC Community members to raise serious concerns within HHC, and retaliatory conduct may deter individuals from raising such concerns.
4. Reports may be made on a confidential basis by the complainant by submitting anonymously through the HHC ComplianceLine. Reports and investigation records will be kept confidential to the extent possible.
5. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the results of the investigation.

Definitions:

For the purposes of this Policy, the following definitions shall apply:

Member: An organization that is a corporate member of Hartford HealthCare Corporation.

Good Faith: Reporting with the reasonable belief that it is true.

HHC: Hartford HealthCare and any and all subsidiaries, Members and joint ventures in which Hartford HealthCare, a subsidiary or Member has a majority interest.

HHC Community: Includes all HHC employees, contracted individuals with the role and responsibility of an employee, medical directors, section, department and division chiefs, members of the board of directors and board delegated committees, officers, executive leadership, volunteers and trainees.

OCI: The HHC Office of Compliance and Integrity (OCI) including staff at the HHC offices and liaisons at each HHC Member.

Retaliation: Retaliation is defined as an adverse action taken because an individual has acted in Good Faith to make a report or participated in or with an institutional investigation, proceeding, or inquiry regarding a report and includes actions which would dissuade a reasonable person from making a report such as discharge, discipline, penalty, demotion, suspension, harassment, or any manner of discrimination against an individual, or any threat of the above. Retaliation negatively impacts significant terms of employment (e.g. salary, demotion, termination, unjustified negative evaluations or other adverse employment or personnel actions, and non-reappointment) and conditions (e.g. harassment and hostile working environments).

Wrongful Conduct: A violation of HHC policy or the Code of Conduct; a violation of applicable state and/or federal laws; the inappropriate use of HHC property, resources, or authority for personal gain or other non-HHC related purpose except as provided under HHC policy; or Retaliation against someone for making a Good Faith Report of suspected Wrongful Conduct.

Miscellaneous:

This policy may be revised, supplemented, or rescinded at any time as HHC deems appropriate in its sole and absolute discretion, without prior notice. This policy (and any other policy) does not constitute a contract of employment and does not in any way limit or modify employees' at-will employment status.

Related Policies:

[HHC-C03 Preventing Fraud Waste and Abuse Policy](#)

[HHC Code of Conduct](#)