

			
Procedure Revised:	1/21/2021	PROCEDURE ANONYMOUS REPORTING OF COMPLIANCE	Procedure Number: 2.01.11
Under CHN Policy: Ethical Standards			Page: 1 of 4
CHN Approval: Irene K. Rickus, President/CEO			
Compliance:	Reference:		
Council on Accreditation.....	ETH 4		

PURPOSE:

The Children’s Home Network (CHN) expects the highest standards of ethical conduct by its Board Members, leadership, management, staff, volunteers, interns, and subcontractors. Everyone in CHN is responsible for reporting any suspected compliance issue or ethical misconduct by employees, volunteers, interns, subcontractors or others.

OPERATIONAL PROCEDURES:

A. REPORTING

An “open door” policy is maintained at all levels of management to encourage employees, interns and volunteers to report problems and concerns of potential violations of law, regulation, policy, and procedures. Employees are strongly encouraged to report problems and concerns via the chain-of-command or Human Resources.

In addition, you can also use the Navex EthicsPoint Compliance Platform (3rd party website) via website/mobile or a toll-free telephone hotline, 844-942-3302 to report problems and concerns, either anonymously or in confidence. This platform is available if special circumstances exist, if issues are not being properly addressed, or if an employee prefers using that means of reporting. Notification of reports to this service is reviewed promptly, and appropriate investigation determined. The resolution is documented, even if “no investigation warranted.”

This platform is made readily available to all employees in a variety of ways (email, postings, QR codes, etc.)

1. Reportable Activities

CHN employees, volunteers, and interns should report improper or questionable activities including, but not limited to, the following:

- a. Making or altering documents or computer files with the intent to defraud.
- b. Intentionally mishandling or reporting money transactions.
- c. Authorizing or receiving compensation for hours not worked.
- d. Misappropriating or misusing CHN resources, such as funds or company property.
- e. Conducting unethical business activities.
- f. Violating State or Federal law.
- g. Requesting another employee to violate any organization policies.
- h. Harassment of any kind.
- i. Concerns about behaviors that could lead to endangerment of staff or clients.
- j. Engaged in a Conflict of Interest that has not been disclosed.

Procedure: Anonymous Reporting of Compliance or Misconduct**2. Protection**

Employees who report problems and concerns to management or via this compliance platform are protected from any form of retaliation or retribution, if they choose to disclose their identity. CHN does not discharge, demote, suspend, threaten, harass, or discriminate against employees in any way for providing information about misconduct, or concerns of potential problems. Any employee who commits or condones any form of retaliation is subject to discipline up to, and including, termination.

Employees cannot exempt themselves from the consequences of their own misconduct by reporting the issue, although self-reporting may be taken into account in determining appropriate disciplinary action.

3. False Accusations

Any employee who makes a false allegation with reckless disregard for the truth, that is intended to be disruptive or to cause harm to another individual(s), faces disciplinary action up to, and including, termination.

4. Confidentiality

All individuals who utilize the compliance platform can access their rights, any limitations, and other pertinent information via the website or hotline phone number. There is also a FAQ section that covers a variety of information surrounding this topic.

All employees involved in the hotline operation and/or investigations are expected to act with utmost discretion and integrity, and shall agree to the terms of the compliance platform.

5. Recording Reports

After you complete a report (via online or phone) you will be assigned a unique code called a "report key". This along with the password created during filing the report should be saved and kept in a safe place. After 5-6 business days, use the report key and password to check the report for feedback/updates or questions.

The compliance platform submits the report to the CEO, Risk Manager, Chief of Human Resources (CHR) and Board Chair for review, investigation, and resolution. If one more or more of the aforementioned parties are named in the report, they will not be provided the report or given knowledge of the report. Issues and results are reported to the Board Operations Committee.

B. INVESTIGATION AND RESOLUTION**1. Notification**

The hotline service simultaneously notifies the following individuals of reports involving CHN:

- a. CEO
- b. CHR
- c. Director of Operations
- d. Board Chair

Procedure: Anonymous Reporting of Compliance or Misconduct**2. Internal Investigations**

The President/CEO has responsibility for directing all internal investigations and assigning participants. In most cases, a resolution is expected within thirty (30) days of receipt of report notification. All employees involved in the compliance platform operation and/or investigations are expected to act with utmost discretion and integrity, and shall agree to the terms of the Employment Confidentiality and Non-Disclosure Agreement.

For internal investigations, an initial inquiry may include document review, personal interviews, audit or other investigative techniques. Such investigations should:

- a. Be a fair and impartial review of all relevant facts.
- b. Be restricted to those necessary to resolve the issues without compromising the quality of the investigation.

Personal interviews are conducted in private, although two interviewers are recommended for sensitive issues. All interviewees are treated respectfully and with dignity. Interviewees are informed that the information revealed is privileged, but that the privilege rests with the organization, and could be waived if required to resolve the issue in question. The information remains in confidence to the extent compatible with the proper resolution of all issues, correction of any improprieties, and the commitment to report violations of law or regulatory requirements. If at any time during an interview, the employee in question requests his/her own counsel, the interview is suspended immediately.

The purposes of an investigation are to:

- a. Identify cause of problem.
- b. Identify affected parties.
- c. Determine applicable guidelines.
- d. Identify desired outcome.
- e. Assess possible regulatory or financial impact.
- f. Document findings and recommendations, including corrective measures.

3. Criminal Violation

In the case where the allegation is a criminal violation of law, the President/CEO, Chief of Human Resources, and Board Chair (above) will:

- a. Consult with legal counsel.
- b. Determine if there is sufficient evidence to support referral to a law enforcement agency.

In cases where the allegation is a criminal violation of law, legal counsel should be present for the interview.

4. Reporting

The report of the investigation is submitted to:

- a. The CHN President/CEO.
- b. Designated Board Member.

5. Corporate Officers

For findings of impropriety by corporate officers, the Board Operations Committee

Procedure: Anonymous Reporting of Compliance or Misconduct

recommends sanctions or disciplinary actions, as appropriate.

6. Consultation

The Chief of Human Resources or the CEO consults legal counsel as needed to ensure compliance with all applicable laws and regulations and to uphold fairness and objectivity.

ATTACHMENTS: None