

**Toledo/Lucas County CareNet  
Policies and Procedures**

**WHISTLE BLOWER POLICY**

**PURPOSE**

Toledo/Lucas County CareNet (“CareNet”) is committed to ensuring that an environment exists for employees, board members, and other persons who provide services for or on behalf of CareNet (collectively referred to herein as “employees”) to report suspected violations of the law, ordinances, regulations, ethical standards, or agency policies, including issues of harassment, waste, abuse, fraud, or other actions and/or activities that threaten the integrity of the organization. The purpose of this Policy is to ensure that no employee is punished solely on the basis of reporting what was reasonably believed to be an act of wrongdoing or a violation of applicable law.

The support of all employees is necessary to achieving compliance with various laws, ordinances, regulations, ethical standards, and agency policies. All employees have an affirmative duty to report perceived misconduct, including actual or potential violations of laws, ordinances, regulations, ethical standards, or agency policies. Employees are protected from retaliation for good faith reports of suspected unlawful activity, policy, or practice.

**PROCEDURE**

Any employee who reasonably believes that some policy, practice, or activity of CareNet, or its employees or agents, is in violation of the law or the policies of CareNet, must report such a complaint or concern to the Executive Director or Chairman of the Board.

The complaint or concern may be filed anonymously or with confidentiality. To file a complaint with the Executive Director or Chairman of the Board, an individual should orally notify one or both of them as soon as practicable. Subsequently, that employee should provide details in writing as soon as practicable to:

Executive Director  
Toledo/Lucas County CareNet  
3550 Executive Parkway #7105  
Toledo, OH 43606  
Julie@nwocarenet.org

OR

Chairman of the Board  
Toledo/Lucas County CareNet  
3550 Executive Parkway #7105  
Toledo, OH 43606

Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Information provided should include, but is not limited to, a description of the questionable activity, the name(s) of the individual(s) involved, the name(s) of possible witnesses, date(s), time(s), location(s), and any other available details in order to provide the Executive Director or Chairman of the Board with a reasonable opportunity to investigate and correct the alleged unlawful activity. The protection described below is only available to employees that comply with this requirement.

Within 24 hours of receiving oral notification or a written report of the alleged violations, the Executive Director or Chairman of the Board shall notify the employee, in writing, of any effort of the employer to correct the alleged violation or hazard or the absence of the alleged violation or hazard. The Executive Director or the Chairman of the Board will designate an individual(s) to begin an investigation within ten (10) business days of the receipt of the complaint or concern. The person(s) so named will solicit participation of other appropriate staff. The investigation will be completed within twenty (20) business days.

CareNet will not retaliate against an employee who, in good faith, has made a protest or raised a complaint against some practice of CareNet, or of another individual or entity with whom CareNet has/had a business relationship, on the basis of a reasonable belief that the practice is in violation of law or a clear mandate of public policy.

CareNet will not retaliate against an employee who discloses or threatens to disclose to a supervisor or a public body any activity, policy, or practice of CareNet that the employee reasonably believes in good faith is in violation of a law, rule, or regulation, or is in violation of a clear mandate of public policy.

Any form of retaliation against any employee who reports a perceived problem or concern in good faith is strictly prohibited. Any employee who commits or condones any form of retaliation will be subject to discipline up to, and including, termination.

However, disciplinary and/or legal action may be taken if CareNet concludes that the report of wrongdoing was knowingly fabricated, distorted, exaggerated, or minimized by the employee to either injure someone else or to protect the reporting party or someone else.

Additionally, an employee whose report of misconduct contains admissions of personal wrongdoing will not necessarily be guaranteed protection from disciplinary action. The weight to be given to self- confession will depend on all the facts known to CareNet at the time it makes its disciplinary decisions. In determining what, if any, disciplinary action may be taken against an employee, CareNet will take into account an employee's own admission of wrongdoing provided that the reporting employee conduct was not previously known to the company, or its discovery was not imminent, and that the admission was complete and truthful.

My signature below indicates my receipt and understanding of this Policy. I also verify that I have been provided with an opportunity to ask questions about the Policy.

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Employee Signature and Date

June 4, 2009--Approved by the Toledo/Lucas County CareNet Board of Directors

Revised June, 2018 – Approved by the Toledo/Lucas County CareNet Board of Directors