

# Veterans Research Foundation of Pittsburgh

## **TITLE: Whistle Blower Policy**

### **1.0 PURPOSE**

All business conduct should be well above the minimum standards required by law. Accordingly, all VRFP stakeholders must ensure that their actions cannot be interpreted as being, in any way, in contravention of the laws and regulations governing VRFP's operations. This policy establishes means for reporting violations of the Standards of Ethical Conduct and for protecting those who report violations. This policy is designed to encourage internal communication regarding unethical behavior in a timely manner.

### **2.0 SCOPE**

All VRFP stakeholders are responsible for reporting improper or unethical behavior.

### **4.0 POLICY**

According to the Whistleblower Protection Act, whistle blowing is defined as disclosing information that an employee reasonably believes is evidence of illegality, gross waste or fraud, gross mismanagement, abuse of power or substantial and specific danger to public health and safety. VRFP and its directors, officers, stakeholders and employees must, at all times, comply with all applicable federal and state laws and regulations. VRFP will not condone the activities of employees who achieve results through violation of the law or unethical business dealings. This includes any payments for illegal acts, indirect contributions, rebates, and bribery. VRFP does not permit any activity that fails to stand the closest possible public scrutiny. Those uncertain about the application or interpretation of any legal requirements should refer the matter to their superior, who, if necessary, should seek the advice of the Executive Director or the Chairman of the VRFP Board. Violations or suspected violations shall be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation. No director, officer or employee who in good faith reports an ethics violation shall suffer harassment, retaliation or adverse employment consequence. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within VRFP prior to seeking resolution outside. Anyone filing a complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

### **5.0 PROCEDURE**

#### **5.1 Reporting Violations**

When a violation of the VRFP Standards of Ethical Conduct is observed, a written notice should be sent to a direct supervisor, the Executive Director, or the Board of Directors. Once the report is filed, the Board will follow the procedures listed in the Standards of Ethical Conduct. If the person

observing the unethical behavior is uncomfortable reporting the violation to any of the VRFP representatives listed above, a toll-free, anonymous hotline and web portal has been established as an alternative reporting method. Both methods are accessible by accessing the VRFP website. Ethics Point is a contracted service provided to support an anonymous and confidential method to hear suggestions, concerns or reports of misconduct. The information provided will be sent to the Executive Director by Ethics Point on a totally confidential and anonymous basis. Reports involving the Executive Director will be sent to the President.

## **6.0 REFERENCES**

- a. Whistleblower Protection Act of 1989

## **7.0 REVISION HISTORY**

Date	Revision #	Change	Reference Section(s)
March 30, 2009	1.0	New policy	
January 27, 2017	2.0		All Sections

**RECERTIFICATION:** This policy is scheduled for recertification on or before the last working day of January, 2019