4C Whistleblower Policy

4C’s Code of Ethics and Conduct requires Directors, Officers, and employees to observe the highest standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the Agency, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

A whistleblower as defined by this policy is an employee of Community Coordinated Care for Children, Inc. (4C) who reports an activity that he/she considers to be illegal or dishonest to one or more of the parties specified in this policy. The whistleblower is not responsible for investigating the activity or for determining fault or corrective measures; appropriate management officials are charged with these responsibilities. Examples of illegal or dishonest activities are violations of federal, state or local laws; billing for services not performed or for goods not delivered; and other fraudulent financial and programmatic reporting.

If an employee has knowledge of or a concern of illegal or dishonest fraudulent activity, the employee is to contact his/her immediate supervisor or the Human Resource Manager. The employee must exercise sound judgment to avoid baseless allegations. An employee who intentionally files a false report of wrongdoing will be subject to disciplinary action up to and including termination.

Whistleblower protections are provided in two areas – confidentiality and against retaliation. Insofar as possible, the confidentiality of the whistleblower will be maintained. However, identity may have to be disclosed to conduct a thorough investigation. To comply with the law and to provide accused individuals their legal rights of defense, the Agency will not retaliate against a whistleblower. This includes, but is not limited to, protection from retaliation in the form of an adverse employment action such as termination, compensation decreases, or poor work assignments and threats of physical harm. Any whistleblower who believes he/she is being retaliated against must contact the Human Resources Manager immediately. The right of a whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated.

All reports of illegal and dishonest activities will be promptly submitted to the Human Resources Manager who has oversight for investigating and coordinating corrective action. If the alleged activity is a suspected violation of an accounting and or auditing practice, the Whistleblower Policy in the Accounting Policy Manual will also apply as it encompasses more specific requirements. Employees with any questions regarding this policy should contact the Human Resources Manager.