

International Compliance 101, 2nd Edition

Appendix A.5: Sample Non-Retaliation/Non-Retribution Policy

Background/Purpose

XXX has implemented a compliance program that promotes the highest standard of ethical and legal conduct. Standards of conduct and procedures for faculty members, residents, and staff are implemented to guide this effort.

XXX believes that positive employee relations and morale can be achieved best and maintained in a working environment that promotes ongoing open communication between supervisors and their employees. Open and candid discussions of employee problems and concerns are encouraged.

XXX believes employees should express their problems, concerns, and opinions on any issue and feel that their views are important. To that end, a policy that will encourage employees to communicate problems, concerns, and opinions without fear of retaliation or retribution will be implemented.

Policy

1. All employees are responsible for promptly reporting actual or potential wrongdoing, including an actual or potential violation of law, regulation, policy, or procedure.
2. The office of compliance will maintain an “open door policy” to allow individuals to report problems and concerns.
3. The office of compliance will act upon the concern promptly and in the appropriate manner.
4. The compliance hotline (1-xxx-xxx-xxxx) is designed to permit individuals to call, anonymously or in confidence, to report problems and concerns or to seek clarification of compliance-related issues.
5. Employees who report concerns in good faith will not be subjected to retaliation, retribution, or harassment.
6. No employee is permitted to engage in retaliation, retribution, or any form of harassment against another employee for reporting compliance-related concerns. Any retribution, retaliation, or harassment will be met with disciplinary action.
7. Employees cannot exempt themselves from the consequences of wrongdoing by self-reporting, although self-reporting may be taken into account in determining the appropriate course of action.

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