



COCD Reporting and Resolving Policy Violations or Other Concerns Policy

Purpose

An employee who becomes aware of a situation that may be a violation of one of the Agency's policies or may involve other misconduct has the responsibility to report the matter. The Policy set forth discusses this, as well as provides contact information, a statement of confidentiality and anonymity for the reporting party, steps that are taken during an investigation, and a statement of non-retaliation. COCD has implemented the policies and procedures in this document, including the reporting procedure outlined below, in order to further the Agency's commitment to the highest possible standards of ethical, moral and legal business conduct.

Policies

An employee who becomes aware of a situation that may be a violation of one of COCD's policies or may involve other misconduct has the responsibility to report the matter.

In most cases an employee should report the situation to his/her immediate supervisor.

An employee who does not wish to address such a concern to his/her supervisor should report the matter to the next level supervisor. COCD strongly encourages this reporting procedure as the most efficient and effective at addressing most issues, but if the employee does not feel it is appropriate to the situation he/she should then report to the Divisional Lead, or to the appropriate members of management as mentioned in the Procedures section of this policy, below.

Reports should be factual rather than speculative or conclusory, and should contain as much specific information as possible. This will allow COCD to make a proper assessment of the nature and extent of the allegations and to determine the need for any preliminary investigative procedure.

Roles in the Executive and Leadership/Management bands, as well as Advisors, Senior Advisors, and Lead Advisors in the Technical/Professional band, and all members of the People & Culture division are required to report behavior they believe may violate this policy within 24 hours of notice. Failure to do so may result in disciplinary action.

COCD expects the management's and staff's full commitment, cooperation, and support of the independent investigation process without interference. Interference from management and/or staff may include but is not limited to filing false complaints, attempting to coerce, compel, influence, or prevent an individual from providing testimony or relevant information, destroying or altering relevant documentation, providing false or misleading information and/or exerting

influence in the conduct of an investigation. Such behavior may result in disciplinary action up to and including termination.

Confidentiality and Anonymity

Confidentiality and Anonymity Reports will be kept confidential to the extent possible under the circumstances. If the person making a report specifically requests, COCD will not disclose his/her identity to the extent that non-disclosure does not hinder the Agency in carrying out a competent and effective investigation.

While COCD will accept and appropriately act upon anonymous reports of possible violations of policy or other misconduct, COCD strongly encourages employees to identify themselves when making reports in order to support COCD's ability to conduct investigations. Not knowing the reporter's identity can make it harder to investigate an alleged concern if enough information is not provided. If a person chooses to report anonymously, the person should provide as much information as possible (ex., dates, time, place, and involved parties.) This data strengthens the Agency's ability to carry out the investigation.

Investigation

If the Agency receives a credible report of conduct in violation of COCD policy or other misconduct, the report will be investigated promptly and, if appropriate, corrective action will be taken. Persons receiving such reports are charged with exercising appropriate judgment in determining which matters may be reviewed under their authority and which must be referred to a higher level of management. Consultation with supervisors is encouraged and the exercise of judgment should err on the side of upward reporting, especially if the report concerns a matter that is likely to involve more than one Agency office or department; receive media or other public attention; create a substantial exposure to liability; or present a significant threat to the safety of staff, beneficiaries or the public. All COCD employees are expected to cooperate fully with such an investigation.

No Retaliation

COCD will not tolerate retaliation against, or harassment of, persons using these reporting procedures in good faith.

Retaliation or harassment may subject an employee to discipline up to and including discharge.