



Founded in 1959
by Sara O'Meara and Yvonne Fedderson
PREVENTION and TREATMENT of CHILD ABUSE

Compliance/ Whistleblower Policy

Purpose

Childhelp is committed to maintaining high standards of compliance in ethical, moral, and legal business conduct. In line with this commitment and Childhelp's commitment to open communication, this policy is intended to encourage employees, board members, consultants, volunteers, clients, and other Childhelp affiliates (i.e. "concerned parties") to report suspected or actual occurrence(s) of illegal, unethical, or inappropriate conduct relating to Childhelp. This policy is also intended to provide avenues for concerned parties to report concerns and to provide reassurance that employees will be protected from retaliation. Concerned parties are encouraged to report suspected or actual occurrence(s) of illegal, unethical, or inappropriate conduct pursuant to the procedures that follow.

Childhelp promotes a working environment that values respect, fairness, and integrity. Childhelp will investigate any illegal, unethical, or inappropriate conduct that is reported in accordance with this policy. All employees, board members, consultants, volunteers, and other Childhelp affiliates shall act with honesty, integrity, and openness in all their dealings as representatives of Childhelp, shall conduct themselves in a manner that shows a genuine concern for clients, shall make all reasonable attempts to maintain the safety and privacy of clients, and shall work diligently at all times to appropriately maintain the highest standards of care. Failure to follow these standards may result in disciplinary action up to and including termination of employment, dismissal from one's board or volunteer duties, and possible civil or criminal prosecution, if warranted.

Definitions

Concerned Party: An employee, board member, consultant, volunteer, client, or other Childhelp affiliate who has concerns of suspected or actual occurrence(s) of illegal, unethical, or inappropriate conduct relating to Childhelp.

Whistleblower: A concerned party who informs a supervisor, their supervisor's supervisor, local human resources staff, corporate human resources staff, including the Vice President of Human Resources, or the Executive Director of suspected or actual occurrence(s) of illegal, unethical, or inappropriate conduct relating to Childhelp or who reports his or her concerns via the confidential Childhelp Integrity Hotline. A concerned party is a reporting individual, not an investigator. As such, a concerned party should not act on his or her own in conducting any investigative activities or follow up steps, nor does he or she have a right to participate in any investigative activities other than as requested by investigators.

Illegal, Unethical, or Inappropriate Conduct: An act or failure to act by an employee, board member, consultant, volunteer, or client that is in violation of any state or federal law or regulation or licensing compliance. Examples of such conduct include, but are not limited to:

- forgery or alteration of documents;
- unauthorized alteration or manipulation of computer files;
- fraudulent financial reporting;
- any fraudulent or unlawful activity;
- engaging in actions that compromise the safety or privacy of a client;



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- pursuit of a benefit or advantage in violation of Childhelp's Conflict of Interest Policy;
- misappropriation or misuse of Childhelp's resources, such as funds, supplies, or other assets;
- authorizing or receiving compensation for goods not received or services not performed;
- authorizing or receiving compensation for hours not worked; and
- other activities that amount to improper or gross misconduct.

Childhelp Integrity Hotline: A confidential message line designated for a concerned party to report his or her concerns of suspected or actual occurrence(s) of illegal, unethical, or inappropriate conduct by leaving a message to be received by the Vice President of Human Resources. The phone number for the Childhelp Integrity Hotline is 877-900-8355.

Baseless Allegation: An allegation made with reckless disregard for its validity. Individuals that make such allegations may be subjected to disciplinary action by Childhelp up to and including termination and/or legal claims by individuals accused of inappropriate conduct.

Reporting Concerns

Reports of concerns should be factual rather than speculative or conclusory and contain as much specific information as possible to allow for proper assessment of the nature, extent, and urgency of preliminary investigative procedures. Concerned parties must be cautious to avoid baseless allegations (as described earlier in the definitions section of this policy). Individuals that report baseless allegations may be subject to disciplinary action up to and including termination of employment.

Direct Reports

A concerned party who has knowledge of or reason to suspect illegal, unethical, or inappropriate conduct should report the concerns to his or her supervisor. If the concerned party finds it difficult to report the concerns to his or her supervisor, he or she may report the concerns directly to the next higher authority, local human resources staff, or corporate human resources staff, including the Vice President of Human Resources or, if necessary, the Executive Director. If a concerned party prefers a more discreet reporting method, he or she can call the confidential Childhelp Integrity Hotline at 877-900-8355. The concerned party can choose whether to disclose his or her identity when reporting concerns via the Integrity Hotline.

If the concerned party, such as a consultant or client, does not have an immediate supervisor, he or she should report the concerns to the functional Program Director or to any or all of the individuals listed above if he or she finds it difficult to report the concerns to the functional Program Director. Board members should report concerns to the Vice President of Human Resources or, if necessary, the Executive Director. Upon verbally reporting concerns, a concerned party will also be encouraged to submit a written summary of the concerns to ensure a clear understanding of the issues raised.



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Anonymous Reports

A concerned party may choose to submit an anonymous, written statement to any or all of the individuals listed above or report his or her concerns via the confidential Childhelp Integrity Hotline at 877-900-8355. Anonymous reporters must provide sufficient, corroborating evidence to justify the commencement of an investigation. An investigation of unspecified wrongdoing or broad allegations will not be undertaken without verifiable, evidentiary support. Because investigators are unable to interview anonymous reporters, it may be more difficult to evaluate the creditability of the allegations and therefore less likely to cause an investigation to be initiated. Concerns reported anonymously will be explored appropriately but consideration will be given to the seriousness of the issues raised, the credibility of the concerns, and the likelihood of confirming the reported concerns from attributable sources.

Rights and Responsibilities

Managers and Supervisors

Managers and supervisors are required to report suspected or actual occurrence(s) of illegal, unethical, or inappropriate conduct relating to Childhelp through one of the above-mentioned reporting methods.

Reasonable care should be taken in dealing with suspected misconduct to avoid:

- baseless allegations;
- premature notice to persons suspected of misconduct and/or disclosure of suspected misconduct to others not involved with the investigation; and
- violations of a person's rights under law.

Due to the important, yet sensitive, nature of suspected misconduct, effective and professional follow-up is critical. Supervisors, while appropriately concerned about "getting to the bottom" of such issues, should not under any circumstances perform any investigative or other follow up steps on their own. Accordingly, a supervisor who becomes aware of suspected misconduct:

- should not contact the person suspected to further investigate the matter or demand restitution.
- should not discuss the concerns with attorneys, the media, or anyone other than local human resources staff, or corporate human resources staff, including the Vice President of Human Resources or, if necessary, the Executive Director.
- should not report the concerns to an authorized law enforcement officer without first discussing them with the Vice President of Human Resources or, if necessary, the Executive Director.

Investigation

Childhelp will investigate any illegal, unethical, or inappropriate conduct that is reported in accordance with this policy. All relevant matters, including suspected but unproven matters, will be reviewed and analyzed by the Vice President of Human Resources and the Executive Director to determine the extent of investigation required. Reported concerns received via the confidential Childhelp Integrity Hotline will be received by the Vice President of Human



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Resources. Reported concerns will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation. Every effort will be made to treat the reporter's identity with appropriate regard for confidentiality.

The receipt, retention, investigation, and treatment of the reported concerns will be documented by the investigators. Records relating to the reported concerns and any subsequent investigation or actions will be retained for three (3) years in a designated and secure location. Appropriate corrective action will be taken, if necessary, and findings will be communicated to the reporting individual and his or her supervisor within thirty (30) days, unless it is determined that additional time is reasonably needed to complete the investigation. Investigations may warrant additional investigation by an independent person, such as an auditor and/or an attorney.

Retaliation Protection

Childhelp will not retaliate against a concerned party who, in good faith, reports suspected or actual occurrence(s) of illegal, unethical, or inappropriate.

Childhelp will protect reporters as defined below:

- Childhelp will use its best efforts to protect individuals who report concerns against retaliation. Reported concerns will be handled with sensitivity, discretion, and confidentiality to the extent allowed by the circumstances and the law. Generally, this means that reported concerns will only be shared on a need-to-know basis to allow Childhelp to conduct an effective investigation, determine what action to take based on the results of such investigation, and in appropriate cases coordinate with law enforcement personnel. Should disciplinary or legal action be taken against a person or persons as a result of a reported concern, such persons may have the right to know the identity of the reporter.
- Employees, board members, consultants, and volunteers of Childhelp may not retaliate against a reporter for informing management about an activity which that individual believes to be illegal, unethical, or inappropriate with the intent or effect of adversely affecting the terms or conditions of the employee's employment, including but not limited to, threats of physical harm, loss of job, punitive work assignments, or impact on salary or fees. A reporter who believes he or she has been retaliated against is encouraged to file a written complaint with local human resources staff or corporate human resources staff, including the Vice President of Human Resources or, if needed, the Executive Director. Any complaint of retaliation will be promptly investigated and appropriate corrective measures taken if allegations of retaliation are substantiated. This protection from retaliation is not intended to prohibit supervisors from taking action, including disciplinary action, in the usual scope of the reporter's duties and based on valid performance-related factors.

Approved: 
Executive Director

Date: 9/17/10