

POLICY AND PROCEDURES

SUBJECT: Employee Retaliation

P&P #	‡	DATE ISSUED	DATE REVIEWED	DATE REVISED
CMPL018		10/18/02	1/21/03; 6/21/04	4/2/03; 10/4/04
REPLACES P	OLICY#	DATE RETIRED		
Date Director, Government Affairs & Compliance		Date Presider	President & Chief Executive Officer	

PURPOSE:

To permit Community Health Network of Connecticut (CHNCT) employees to report possible compliance issues or to participate in misconduct investigations without fear of retribution.

POLICY:

CHNCT employees shall not be subject to retaliation or harassment as a result of reporting possible misconduct or non-compliant behavior or participating in an investigation of misconduct.

PROCEDURE:

- **I.** Employees have the responsibility to report, in good faith, concerns about actual or possible compliance issues or misconduct.
- **II.** Employees have the responsibility to participate in investigations conducted in reference to an actual or potential compliance issue.
- **III.** CHNCT strictly prohibits any form of retaliating against employees who have reported possible compliance issues or who have participated in investigations of misconduct.
- **IV.** CHNCT strictly prohibits any form of retaliating against its Members or others who have reported a possible violation of privacy rights to CHNCT, the government or any of its agents.
- V. Any supervisor, manager or employee who is found to have engaged in retaliation, retribution or harassment against another employee who has reported misconduct or participated in an investigation will be subject to disciplinary action up to and including dismissal on the first offense.
- **VI.** Any employee who has concerns of retaliation should contact the Director of Government Affairs and Compliance, who will work with Human Resources to investigate and determine the appropriate discipline, if any.
- VII. CHNCT will not retaliate against any employee, individuals or others for opposing in good faith any act or practice made unlawful by federal, state or local law, regulation or policy, provided that the manner of opposition is reasonable and does not itself violate the law.