

# NWF Health Network Policy & Procedure

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**Series:** 1100: Human Resources

**Policy Name:** Reporting Irregularities (Whistle Blowing)

**Policy Number:** 1124

**Origination Date:** 02/17/2009

**Revised:** Board Meeting of 12/14/2023

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## Policy

NWF Health Network (NWFHN), is committed to the highest possible standards of integrity, openness and accountability in all of its affairs. In line with that commitment, we strongly support our employees to voice any concerns about observed irregularities. NWFHN will quickly ensure any reported concerns are adequately investigated.

## Procedure

### A. Scope and Definitions.

1. This policy applies to any irregularity, suspected or real, involving employees and board members as well as consultants, vendors, providers, contractors, outside agencies and any other parties with a business relationship to NWFHN.
2. While irregularities do not in themselves prove illegal or fraudulent acts have occurred, they are often indicators that company policies are not being followed and therefore, all reported irregularities will be investigated.
3. Any investigative activity required will be conducted without regard to the suspected wrongdoer's length of service, position, title or relationship to NWFHN.
4. Irregularities are activities, behaviors or situations that normally do not occur within the regular conditions that business is conducted at NWFHN.
  - a. Irregularities can be obvious violations of company policies, such as an employee leaving work with company property; however, irregularities can also be subtle indications that something is just not right, such as an employee behaving strangely.
  - b. When considering what may or may not be an irregularity, employees should report any conditions that they know are improper and also rely on their intuition and report any conditions that make them sense something irregular may be occurring.
  - c. In accordance with subsection 112.3187(2), F.S., NWFHN and its subcontractors shall not retaliate against any employee for reporting violations of law, rule, or regulation that creates substantial and specific danger to the public's health, safety, or welfare to an appropriate agency. Furthermore, NWFHN and/or its subcontractors shall not retaliate against any person who discloses information to an appropriate agency alleging improper use of government office, gross waste of funds or any other abuse or gross neglect of duty on the part of an agency, public officer or employee.

### B. Method for Reporting Irregularities.

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1. NWFHN encourages staff to raise concerns within NWFHN rather than overlooking a problem or raising the concern first to the media or other external bodies.
    - a. Employees should report any irregularities to their supervisor.
    - b. If they are not comfortable discussing the irregularity with their supervisor, employees can report it to any member of senior management.
    - c. Employees may file a complaint with the Office of the Chief Inspector General, Agency Inspector General, the Florida Commission on Human Relations or the Whistleblower Hotline number at 1-800-543-5353.
  2. In order to alleviate reporting concerns, the following safeguards will be used:
    - a. NWFHN will not tolerate any harassment or victimization and will take action to protect those who raise a concern in good faith.
    - b. NWFHN will do its best to protect an individual's identity when a concern is reported and the originator does not want their name disclosed.
      - i. It must be understood that the investigation process may reveal the source of the information and a statement by the individual may be required as part of the evidence.
    - c. NWFHN encourages individuals to put their names to allegations.
      - i. Concerns expressed anonymously are much less powerful, but they will be considered at the discretion of NWFHN.
      - ii. In exercising this discretion, NWFHN will consider factors such as, the seriousness of the issues raised, the credibility of the concern and the likelihood of confirming the allegation from attributable sources.
    - d. If an allegation is made in good faith, but not confirmed by the investigation, no action will be taken against the originator.
    - e. If however, an individual makes malicious or purely vindictive allegations, action may be considered against the individual making the allegation.
    - f. Any investigative activity required will be conducted without regard to the suspected wrongdoer's length of service, position, title or relationship to NWFHN.
- C. Response to Reported Irregularities.
1. Within five (5) working days of a concern being received, a member of the senior management team will write to the complainant:
    - a. Acknowledging the concern has been received.
    - b. Indicating how it proposes to deal with the concern.
    - c. Giving an estimate of when a final response can be provided.
    - d. Informing if any initial enquiries have been made.
    - e. Explaining if further investigation will take place, and if not, why not.
  2. All reported irregularities and concerns will be investigated by NWFHN.
    - a. Concerns that have the potential for uncovering illegal acts or material levels of fraud may also be referred to the police.

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- b. NWFHN will also seek legal advice if a significant illegal act or fraud is suspected.
- 3. If a significant loss has occurred due to fraud, NWFHN will also seek legal assistance about recovering the loss from the perpetrator.
  - a. NWFHN would normally expect to recover costs in addition to losses.
- 4. If report is made to Office of Chief Inspector General, Agency Inspector General, the Florida Commission on Human Relations or the Whistleblower Hotline number those entities will respond directly to the complainant.