STANDARD STATEMENT

CWM is committed to conducting its affairs honestly, ethically and in compliance with applicable laws, regulations, and University and CWM policies (Rules). Workforce and all CWM Contractors have an obligation to comply at all times with those requirements that relate to their respective duties and to report any known or suspected conduct that violates any Rules. Retaliation against members of the Workforce or CWM Contractors and agents who make good faith Reports regarding potential violations of the Rules is prohibited, and violators may be subject to disciplinary or other action as permitted by law and University or CWM standard.

REASON FOR STANDARD

This Non-Retaliation/Whistleblower Standard is intended to encourage and enable members of the Workforce and all CWM Contractors and agents to make good-faith Reports of observed or suspected misconduct or noncompliance with the Rules without fear of retaliation or retribution. The purpose of this standard is to comply with applicable federal and state laws, and University and CWM standard prohibiting retaliation for such good faith reporting.

ENTITIES AFFECTED BY THIS STANDARD

All Workforce members, Contractors, and agents of CWM.

RELATED DOCUMENTS

Complaint Reporting and Investigation

SCOPE

This standard applies to the Workforce and all CWM Contractors and agents who report violations of Rules in good faith to their supervisor, the UMMS Privacy, Compliance and Ethics Hotline (Hotline), OoM, any appropriate CWM Business Unit manager, or any appropriate governmental agency.

DEFINITIONS: (See Glossary on Office of Management (OoM) website for additional definitions)
RESPONSIBILITIES

**Workforce, and all CWM Contractors and agents:**
- Any member of the Workforce, CWM Contractor and agent with knowledge of or reasonable belief that there has been material misconduct, including actual or potential violations of the Rules must report it to his or her supervisor, manager, business unit director or the OoM.
- No Workforce member, or CWM Contractor and agent shall engage in any retaliation, retribution or harassment of any workforce member for reporting a potential or actual violation of any Rules to appropriate management, and no member of the Workforce, or CWM Contractor and agent shall be subject to retaliation, retribution or harassment for any such Report.

**Supervisor:**
- Must promote an open-door policy regarding receipt of Reports of potential or actual violations.
- Must forward Reports to OoM or Human Resources (“HR”), as appropriate, and must protect the confidentiality of Reports to the extent practical and permitted by law, University policy and CWM standard.
- Shall not engage in any retaliation, retribution or harassment of any Workforce member, CWM Contractor, or agent for reporting a potential or actual violation.

**Compliance and Privacy Officer, Office of Management (OoM):**
- Shall be responsible for the investigation of any violations or potential violations of law, policy, procedures or standards reported to OoM or the Hotline as provided for in the Complaint Reporting and Investigation Standard.
- Shall be responsible in conjunction with HR and senior management for the investigation and follow-up of any reported retaliation, retribution or harassment against a Workforce member, CWM Contractor or agent for making a Report, and for working with HR to determine the appropriate action on behalf of the University and CWM with respect to any claim for which retaliation is confirmed.

**Human Resources:**
- Shall work with the Office of Management to investigate and follow-up on any reported retaliation, retribution or harassment against a Workforce member, CWM Contractor or agent for making a Report of a potential or actual violation.

**STANDARDS**

A. Workforce members, CWM Contractors, and agents who in good faith report a potential violation of the Rules, shall not be subjected to retaliation, retribution or harassment. No supervisor, manager, Workforce member, CWM contractor or agent is permitted to engage in retaliation, retribution or harassment against a Workforce member, CWM contractor or agent for reporting a concern related to violations or potential violations of the Rules.

B. All Workforce members and CWM Contractors and agents shall be informed of the Non-retaliation/Whistle blower standard.

C. Knowledge or suspicion of misconduct, violations of the Rules, or other wrongdoing must be immediately reported to your supervisor and the Hotline.

D. Workforce Members, CWM Contractors, and agents, who self-report any violation of the rules are not exempt or otherwise protected, although self-reporting may be considered by CWM in determining the appropriate course of action.
E. All instances of retaliation, retribution or harassment against reporting Workforce members, CWM Contractors or agents shall be brought to the attention of the Compliance and Privacy Officer, Office of Management, who, in conjunction with HR and Senior Management, shall investigate and determine the appropriate action. Any Workforce member, CWM Contractor or agent who conducts or condones retribution, retaliation, or harassment shall be subject to disciplinary measures, which may include discharge or other legal action as authorized by law and University policy or CWM standards.

**DOCUMENT HISTORY**

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**APPROVALS**

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