

COMPLIANCE HELPLINE – Policy & Procedures

All ERC Programs

Scope

- Applies to all ERC Programs
- Applies to all ERC Workforce Members
- Applies to persons served by ERC, caregivers, contractors and visitors.
- The Compliance Helpline will be managed by the ERC Corporate Compliance Officer.

Policy

To encourage ERC workforce members and persons served by ERC to voice their concerns, ERC established the reporting Compliance Helpline which provides the opportunity to report concerns in an anonymous manner. This helpline may be used to report a variety of ethical, integrity, safety, security, and compliance concerns.

This Helpline **does not** replace the mandated reporter of abuse and neglect requirement.

ERC will not tolerate retaliation against members of the ERC community for raising such concerns in good faith.

Procedure

The Compliance Helpline can be accessed via the ERC website at www.ercinc.org.

Before submitting a report, please read the guidelines below to better understand the reporting process, including information regarding non-retaliation and confidentiality.

The Helpline is meant for reporting of issues in situations where you don't feel comfortable speaking with a supervisor or other resource. Any concerns may be raised through the Helpline including, but not limited to:

Misconduct

Bias-related incidents

Conflicts of interest

Environmental health and safety concerns

Fraud/theft

Inappropriate care of persons served

Medical, safety, and security concerns

Misuse of ERC resources/assets

Violations of law, regulation, contract, or ERC policy

The report may be submitted anonymously or the person completing the report may choose to provide contact information. Providing contact information would allow ERC to reach out and obtain additional details if needed. In either case, the report will be kept confidential to the extent practical. It is not always possible to guarantee absolute

confidentiality in all cases. However, disclosure, if any, will only be made to those persons with a legitimate need to know.

When describing the improper activity, the reporter should provide as much of the following information for *each* allegation and number each allegation, if there are more than one.

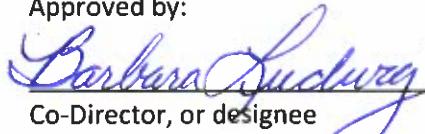
- Who?** Who was involved? If outside businesses or contractors are involved, what are the names of the businesses, who owns them, and where are they located? Who else knows about the improper activities? Who can and would confirm that they occurred? How can we reach these witnesses?
- What?** What specifically did the suspect do? What is wrong with it? Are there laws or regulations that govern what the suspect did? What kinds of documents would provide evidence of the improper activities? Where are the documents located? Who controls them?
- Where?** Which division, unit, or location did the action happen?
- When?** When did the improper activity occur? Is it ongoing? How frequently has it occurred?
- How?** How did the wrongdoing occur? Was there a lack of controls, circumvention of controls, or collusion with other individuals?

All reports will be reviewed and addressed appropriately and in a timely manner by the Corporate Compliance Officer and the Asst. Executive Director and/or the Sr. Director of Administration and/or a Co-Director, as appropriate.

Review/Revision/Approval Information

- List all review/revision dates made by P&P Review Committee: 2/2018, 2/2019, 11/2019

- Approved by:



Co-Director, or designee



Date



Asst. Executive Director, or designee



Date



Corporate Compliance Officer



Date

- Reviewed/Approved by Board of Directors Committee (if required): Policy approved 2/2018

Printing this document may make it obsolete. For the latest version of this policy, always check the ERC website at www.ercinc.org/AboutUs/Policies.