



## OCH WHISTLEBLOWER PROTECTION POLICY

1. **WHO DOES THE POLICY APPLY TO:** This Whistleblower Protection Policy applies to all Olympic Community of Health (OCH) staff, including full-time, part-time, temporary, contractors, volunteers, and to all officers and directors, each of whom shall be entitled to protection.
2. **WHEN A PROTECTED PERSON CAN SUBMIT A REPORT:** A protected person shall be encouraged to report information relating to illegal practices or violations of policies of OCH (a "Violation") that such person in good faith has reasonable cause to believe is credible. Anyone reporting a Violation must act in good faith and have reasonable grounds for believing that the information shared in the report indicates that a Violation has occurred.
3. **HOW TO SUBMIT A REPORT:**
  - a. Information shall be reported to the Executive Director who serves as the Compliance Officer for the OCH. The protected person may raise concern to the Executive Director through any of the following ways:
    - i. Formal letter to:  
Olympic Community of Health  
Attn: Celeste Schoenthaler  
PO Box 641  
Port Townsend, WA 98368
    - ii. Dedicated phone number/ communicator chat: (360) 633-9241
    - iii. Dedicated email address: [celeste@olympicch.org](mailto:celeste@olympicch.org)
  - b. If the report relates to the Executive Director, the report shall be made to an officer of the Board of Directors who shall be responsible to provide an alternate procedure. The contact information found on the OCH website at <https://www.olympicch.org/leadership>.
  - c. The report should contain the following information:
    - i. Background of the concern(s) (with relevant dates); and
    - ii. Reason(s) why the whistleblower is particularly concerned about the situation.
4. **CONFIDENTIALITY:** OCH encourages anyone reporting a Violation to identify themselves when making a report in order to facilitate the investigation of the Violation. However, Whistleblower Complaint Forms may be submitted anonymously and mailed to the Executive Director or the President of the Board. Reports of Violations or suspected Violations will be kept confidential to the extent possible, with the understanding that confidentiality may not be maintained where identification is required by law or in order to enable OCH or law enforcement to conduct an adequate investigation.
5. **PROTECTION FROM RETALIATION:** No person entitled to protection shall be subjected to retaliation, intimidation, harassment, or other adverse action for reporting information in accordance with this policy. Any person entitled to protection who believes they are the subject of any form of retaliation for such participation should immediately report the same as a violation of and in accordance with this policy. Any individual within OCH who retaliates against another individual who has reported a Violation in good faith or who, in good faith, has cooperated in the

investigation of a Violation is subject to discipline, including termination of employment or volunteer status.

6. **DISSEMINATION OF POLICY:** This policy shall be disseminated in writing to all impacted parties and posted on the OCH website.



## WHISTLEBLOWING RESPONSE PROCEDURE

The whistleblowing procedure involves steps required for the investigation of the reported misconduct. The following procedures shall guide the whistleblowing process:

### **1. Actions to be Taken When Report is Submitted to Compliance Officer/Executive Director**

- a. Consult with legal counsel to:
  - i. determine whether the complaint pertains to a matter covered by this policy and procedure;
  - ii. decide whether the reported violation requires review by the Compliance Officer or should be directed to another person; and
  - iii. develop a recommended strategy for the investigation of the complaint including interviewing employees if necessary.
- b. Acknowledge receipt of complaint (if not anonymous) to the submitter.
- c. Investigate the complaint reported or designate an investigator.
- d. Document the findings and any action taken.
- e. Submit a copy of the report related to results from the investigation to the OCH Board or Board-Appointed Committee.

### **2. Actions to be Taken When Report is Submitted to OCH Board or Board-Appointed Committee Member(s)**

- a. Consult with legal counsel to:
  - i. determine whether the complaint pertains to a matter covered by this policy and procedure;
  - ii. decide whether the reported violation requires review by the OCH Board or OCH Board-Appointed Committee or should be directed to another person; and
  - iii. develop a recommended strategy for the investigation of the complaint including interviewing employees if necessary.
- b. The OCH President or Committee Chair shall report to the submitter, that the complaint is acknowledged, and that appropriate action will be taken. Considering that complaints may be anonymous, it is understood that such acknowledgement may not be possible.
- c. Investigate the complaint reported or designate an investigator.
- d. Document the findings and any action taken.
- e. As deemed appropriate, in the President or Chair's opinion, and no less than once a quarter, report to the Committee on the status of submitter reports.
- f. Submit quarterly reports on the status of all complaints to the Board of Directors.

- g. To the extent deemed appropriate, the President of the Board or Committee shall ensure feedback is provided to the person submitting the complaint.

### **3. Record Keeping and Retention**

The Compliance Officer will maintain records of all complaints covered by these procedures, tracking their receipt, investigation, and resolution and shall prepare a periodic report to the OCH Board or the Board-appointed committee until the matter has been resolved to the satisfaction of the OCH Board or Board-appointed committee. Copies of all complaints and investigation records will be maintained in accordance with OCH's document retention policy.

### **4. Confidentiality**

Confidentiality will be maintained to the fullest extent possible, consistent with the need to conduct adequate review.