



Boston VA Research Institute, Inc.

Date 12/12/2008

Governance

POLICY NO.08 6

TITLE OF POLICY:

WHISTLEBLOWER POLICY

1.0 PURPOSE:

All business conduct should be well above the minimum standards required by law. Accordingly, all BVARI stakeholders must ensure that their actions cannot be interpreted as being, in any way, in contravention of the laws and regulations governing BVARI's operations. This policy establishes means for reporting violations of the Standards of Ethical Conduct and for protecting those who report violations. This policy is designed to encourage internal communication regarding unethical behavior in a timely manner.

2.0 SCOPE:

All BVARI stakeholders are responsible for reporting improper or unethical behavior.

3.0 POLICY:

BVARI and its directors, officers, stakeholders and employees must, at all times, comply with all applicable laws and regulations. BVARI will not condone the activities of employees who achieve results through violation of the law or unethical business dealings. This includes any payments for illegal acts, indirect contributions, rebates, and bribery. BVARI does not permit any activity that fails to stand the closest possible public scrutiny.

Those uncertain about the application or interpretation of any legal requirements should refer the matter to their superior, who, if necessary, should seek the advice of the CEO or the Chairman of the BVARI Board.

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

No director, officer or employee who in good faith reports an ethics violation shall suffer harassment,

retaliation or adverse employment consequence. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within BVARI prior to seeking resolution outside.

Anyone filing a complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

4.0 DEFINITIONS:

Whistleblower - A stakeholder who reports, in good faith, suspected violations.

Stakeholder - Directors, officers, employees, volunteers, grantees, contractors and/or vendors of BVARI

5.0 RESPONSIBILITIES:

5.1 BVARI Board of Directors: The BVARI Board of Directors is responsible for the overall policy, planning and coordination of all BVARI activities within the VA Boston Healthcare System.

5.2 CEO: The BVARI CEO is responsible for developing, administering and coordinating a business process that provides optimal internal controls for BVARI.

5.3 Department Director: BVARI's Department Director is responsible for ensuring that the BVARI employees follow the policies defined in the policy.

6.0 PROCEDURES:

When a violation of the BVARI Standards of Ethical Conduct is observed, a written notice should be sent to either a direct supervisor, the BVARI Director of Human Resources, or the BVARI Board of Directors. Once the report is filed, the Board will follow the procedures listed in the Standards of Ethical Conduct. If the person observing the unethical behavior is uncomfortable reporting the violation to any of the BVARI representatives listed above, a toll-free, anonymous hotline has been established as an alternative reporting method.

EthicsPoint is a contracted service provided to BVARI stakeholders to support an anonymous and confidential method to hear suggestions, concerns or reports of misconduct. The information provided will be sent to the BVARI Board of Directors by EthicsPoint on a totally confidential and anonymous basis. Reports to EthicsPoint can be made wither by toll-free phone call or on a web portal hosted specifically for BVARI, reachable from the BVARI website.

7.0 RELATED DOCUMENTS:

8.0 REVISION HISTORY:

Revision Letter	Author	Revision Date	Description of Changes
A	Nancy Watterson-Diorio	12/12/2008	Original document

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POLICY NO.08 6
Transmittal Sheet

Date

REASON FOR ISSUE:

SUMMARY OF CHANGES:

RELATED DOCUMENTS:

RESPONSIBLE OFFICER:

Director of Human Resources

RESCISSION:

RECERTIFICATION: This policy is scheduled for recertification on or before the last working day of January , 2011 .

Nancy Watterson-Diorio
Chief Executive Officer

DISTRIBUTION

Board of Directors, Date _____

FLD: Sharepoint Server _____, E-mailed _____ to:

BVARI Staff, Stakeholders