

Suncoast Communities Blood Bank, Inc.
Sarasota, FL

WHISTLEBLOWER POLICY

System	Human Resources
Document Title	Whistleblower Policy

Location HR

Purpose To establish and define a process for employees and volunteers to notify the appropriate blood bank representative when they have a good faith concern that some policy, practice or activity is unethical, illegal or not in compliance with regulatory requirements.

- Policies**
1. Suncoast Communities Blood Bank is committed to lawful and ethical behavior in all activities and requires employees and volunteers to conduct themselves in a manner that complies with applicable laws, regulations and policies.
 2. Any employee or volunteer who has a good faith concern regarding the legality or propriety of any policy, practice or activity, or has a good faith belief that action needs to be taken for the blood bank to be in compliance with laws, regulations, policies or ethical standards, should notify the appropriate contact as defined below.
 3. Reports of unlawful or unethical behavior may be made verbally or in writing, in person or anonymously.
 4. Reports are to be made to the employee’s immediate supervisor. If the employee feels unable to do so or if there is any reason why this may not be appropriate, the employee should contact his or her department director. An employee who is unsure to whom he or she should make a report, should contact the Director of Human Resources.
 5. If for any reason the employee or volunteer does not feel comfortable contacting any of the management representatives defined above, or if management has been unresponsive they may contact the President of the Board of Directors.
 6. Any supervisor or department director who receives a report of unlawful or unethical behavior is required to promptly notify the Director of Human Resources.
 7. The Director of Human Resources will notify the CEO, and together they will make a determination regarding the subsequent investigation.
 8. The investigation will be conducted promptly and will strive to protect the confidentiality of those involved. However, the need to conduct an adequate investigation may not allow for a guarantee of complete confidentiality.
 9. Upon completion of the investigation, appropriate corrective action up to and including termination will be taken if warranted by the investigation.
 10. If circumstances warrant, the Director of Human Resources will notify the Chair of the Board’s Audit Committee for issues related to financial matters or the Chair of the Human Resources committee for all other matters.
 11. The blood bank will not discharge, threaten or discriminate against any employee or volunteer in any manner for reporting in good faith what he or she perceives to be wrongdoing, a violation of law, regulation or policy, or other unethical conduct. However, if it is determined that an employee has made allegations maliciously or knowingly false, he or she will be subject to corrective action up to and including termination.
 12. If it is determined that an employee or volunteer retaliates or threatens retaliation for good faith reporting, he or she will be subject to corrective action up to and including termination.

- Whistleblower Investigation –**
1. Report incidents of unlawful, unethical or other wrongful conduct to the appropriate contact as described above.
 2. Provide the following information:
 - Alleged violation.
 - When the violation occurred.
 - Names of those involved.
 - Names of witnesses, if any.

SOP R011.4
Rev. Date 10-18-06

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**Whistleblower
Investigation –**

**Department Head
Procedure**

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1. Upon notification of an incident of alleged wrongful conduct as defined above, obtain the facts.
 2. Contact the Director of Human Resources immediately and report the incident.
 3. Participate in all phases of the investigation as necessary.
 4. Upon completion of the investigation, discuss findings with the Director of Human Resources and CEO and determine appropriate action.
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**Whistleblower
Investigation –**

**Director of Human
Resources
Procedure**

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1. Upon notification of an alleged violation, conduct a timely investigation, generally within 3-5 days.
 2. Prepare all necessary investigation materials.
 3. Review any applicable blood bank policies.
 4. Determine how extensive the investigation needs to be, if the investigation should be conducted by an outside entity or if outside law enforcement or other regulatory agencies need to be notified.
 5. If it is determined that the investigation will be conducted internally, work with department head to schedule and conduct meetings in a private setting with the employee voicing the complaint, the employee who is being charged and any named witnesses.
 6. Develop an investigatory interview question list. Be consistent and ask all involved the same types of questions. However, follow-up questions prompted by employee answers are appropriate.
 7. Inform participants that it is the blood bank's policy to protect the privacy rights of all employees involved in the investigation. Request that all participants refrain from discussing the matter with others in the workplace.
 8. Take thorough notes during all phases of the investigation. Record the subject's own words and descriptions wherever possible. Inform the employee that when the interview is complete, all notes are transcribed. Ask the employee to sign the transcribed statement, attesting to its accuracy.
 9. Interview the employee voicing the complaint first. Give the employee information about how the investigation will be conducted and when he or she can expect the findings.
 10. Once the interview is completed, thank the employees for their assistance and emphasize that they will not be retaliated against for their participation.
 11. Interview the individual being named next. Inform him or her that a complaint has been made, and explain how the investigation will be conducted and when he or she can expect the findings.
 12. Interview any witnesses that are named either by the employee voicing the complaint or by the employee being named. Interview anyone who may know of the alleged incident or who may have been informed of the incident.
 13. Explain to the witnesses how the investigation will be conducted and request that they refrain from discussing the matter so that the privacy rights of all involved can be maintained.
 14. After all interviews are completed and the transcribed notes are signed, discuss the findings with department director and CEO.
 15. Determine appropriate corrective action.
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**Whistleblower
Investigation –**

Board President

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1. If contacted by a blood bank employee or volunteer regarding an incident of alleged wrongful conduct as defined above, obtain the facts of the incident.
 2. Based on the circumstances of the alleged incident consult with the CEO, the Chair of the Board's Audit Committee, the Chair of the Human Resources Committee or with the blood bank's attorney.
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