



POLICY AND PROCEDURE MEMO

SUBJECT: COMPLIANCE HOTLINE REPORTING POLICY

NO. 2.011
DATE: 10-18-13 Approved
9-27-21 Revised

DocuSigned by:

Blaine Cox

CITY MANAGER

I. STATEMENT:

The City of Rochester is committed to high standards of ethical, moral and legal conduct. In line with this commitment, and the City's commitment to open communication, this policy aims to provide an avenue for employees to raise concerns and provide assurance that they will be protected from reprisals or victimization for making good faith reports alleging improper or wrongful activity, such as:

- Discrimination or harassment;
- Unlawful activity;
- Fraud;
- Unethical or unprofessional business conduct;
- Noncompliance with City policies/procedures;
- Circumstances of substantial, specific or imminent danger to an employee or the public's health and/or safety;
- Violations of local, state or federal laws and regulations; or
- Other illegal or improper practices or policies.

II. POLICY

1. All employees are responsible for promptly reporting actual or potential wrongdoing, including an actual or potential violation of law, regulation, policy, or procedure.
2. All employees who, in good faith, report such incidents as described above will be protected from retaliation (defined as an adverse action taken because an individual has engaged in protected activities), threats of retaliation, discharge, or other discrimination.



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3. No employee may be adversely affected because they refused to carry out a directive which constitutes fraud or is a violation of local, state, federal or other applicable laws and regulations.

III. PROCEDURE

1. Knowledge of actual or potential wrongdoing, misconduct, or violations must be reported immediately to management, the ***Compliance Officer, by calling the Compliance Hotline at 603-509-1905 or you may report online at Compliance@RochesterNH.net***.
2. All managers must maintain an open-door policy and take aggressive measures to assure their staff that they system truly encourages the reporting of improper or wrongful activity and that there will be no retaliation, retribution, or harassment for doing so.
3. If employees have concerns, they should be addressed in the following order:
 - a. Immediate supervisor;
 - b. Department Head/Director;
 - c. If an employee feels uncomfortable with the above, the employee should report concerns directly to the ***Compliance Officer, by calling the Compliance Hotline at 603-509-1905 or report online at: Compliance@RochesterNH.net***.
4. A Compliance Intake Form will be completed for all reports or calls to the Hotline and will include all pertinent information such as: date of report (or call), name of caller (if provided), the names of the persons or departments involved, a detailed description of the suspected violation, whether there is documentation to support the allegation.
5. All concerns will be investigated within 30 days.
6. The Compliance Officer will review every report and keep a documentary record of all reports received. For each report, a record of each decision made and each action initiated will be kept. All reports will be kept for a period of six (6) years.



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7. Confidentiality regarding employee concerns will be maintained at all times insofar as legal and practical, informing only those personnel who have a need to know.
8. At the conclusion of the investigation, the Compliance Officer will document on the Compliance Intake Form all findings, corrective action, disciplinary action taken, education provided, etc.

IV. ANONYMOUS ALLEGATIONS

This policy encourages employees to put their names to allegations because appropriate follow-up questions and investigation may not be possible unless the source of the information is identified. Concerns expressed anonymously will be explored appropriately, but consideration will be given to:

- The seriousness of the issue raised;
- The credibility of the concern; and
- The likelihood of confirming the allegation from attributable sources.

V. BAD FAITH ALLEGATIONS

Allegations in bad faith may result in disciplinary action.

-END OF PROCEDURE-



Ethics & Compliance Program
Compliance Intake Form

Date: _____ Name of caller: _____

Person/Dept. Involved: _____

Detailed Description of suspected violation: _____

Action Taken: _____

Follow-up Date: _____

Follow-up Action: _____

Findings/Resolution: _____

Report Made by: _____ Date: _____

Something wrong at work?

**Have you witnessed fraud
or abuse by a co-worker?**

**Not sure what to do
or who to call?**

call the

603-509-1905

Ethics & Compliance Helpline

(*This line is unattended; you will be prompted to leave a voice message or you may email Compliance@RochesterNH.net with your concerns)

✓ **Easy and confidential 24/7 access**

✓ **Report actual or potential wrongdoing,
including an actual or potential violation
of law, regulation, policy or procedure**

We assure that:

Confidentiality will be respected.

*There will be no retaliation, retribution, or
harrassment for reporting any wrongdoing.*



City of Rochester, 31 Wakefield Street, Rochester, NH 03867

Ethics & Compliance Program

Ph: 603-509-1905 www.RochesterNH.net

email: Compliance@RochesterNH.net