

Iowa Cancer Consortium Whistleblower Policy

Effective Date: October 1, 2009

Reviewed/Revised/Renewed by Board of Directors: May 7, 2019



Purpose

The Iowa Cancer Consortium (the Consortium) is committed to high standards of ethical, moral and legal business conduct. This policy declares the Consortium's commitment to open communication and provides an avenue for employees, directors, members and volunteers to raise concerns. This includes

- The confidential submission of concerns regarding questionable accounting practices or legal or ethical conduct by any employee, director or volunteer of the organization.
- The receipt, retention and treatment of complaints received by the Consortium.
- The protection of employees, members and volunteers reporting concerns from retaliatory actions.

Policy

The Consortium prides itself on its adherence to federal, state and local laws and regulations, including business ethics policies. All employees, directors and volunteers are encouraged to raise concerns regarding

- Unlawful activity.
- Activities that are not in line with [Consortium policy](#).
- Any activity that constitutes serious improper conducts.
- Financial wrongdoing.

Financial wrongdoing may include, but is not limited to

- Questionable accounting practices.
- Fraud or deliberate error in financial statements or recordkeeping.
- Deficiencies of internal accounting controls.
- Misrepresentations to Board of Directors, funding agencies or auditors.

Any employee, member or volunteer who becomes aware of any violation or who has justified suspicions should immediately report the violation to the Executive Director. The Consortium will investigate and take appropriate action within a reasonable period. Such complaints will be held in confidence to the extent the needs of the investigation permit.

If the Executive Director is involved or is believed to be involved in the matter being reported, employees, directors, members or volunteers should report the situation to the President, Board of Directors.

Anonymous Allegations

This policy encourages employees, members and volunteers to put their names to allegations to allow for appropriate follow-up questions and investigation to take place. 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.



Bad Faith Allegations

Although the employee or volunteer is not expected to prove the truth of an allegation, they should be able to demonstrate to the person contacted that the report is being made in good faith. Allegations made in bad faith may result in disciplinary action.

Handling of Concerns

The action taken by the Consortium in response to a report of concern under this policy will depend on the nature of the concern. The executive director shall receive information on each report of concern and follow-up information on actions taken.

Initial inquiries will be made to determine whether an investigation is appropriate, and the form that it should take. Some concerns may be resolved without the need for investigation.

The amount of contact between the complainant and the person or persons investigating the concern will depend on the nature of the issue and the clarity of information provided. Further information may be sought from or provided to the person reporting the concern.

The Consortium has the authority to retain outside legal counsel, accountants, or any other resource deemed necessary to conduct a full and complete investigation of the allegations.

Whistleblower Protection

If any employee, director or volunteer reports in good faith what they believe to be a violation of the law and/or financial wrongdoing to the Consortium or to a federal, state or local agency, it is the Consortium's policy that there will be no retaliation taken against the complainant.

Every effort will be made to treat the complainant's identity with appropriate regard for confidentiality. Harassment or victimization for reporting concerns under this policy will not be tolerated.