



Boston VA Research Institute, Inc.

Date: 10/22/2013

HUMAN RESOURCES

POLICY NO. 13-06

TITLE OF POLICY:

WHISTLE BLOWER 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 federal and state 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 shall 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 DIRECTOR OF HUMAN RESOURCES: 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 either by toll-free phone call (888-279-1921) or on a web portal hosted specifically for BVARI, reachable from the BVARI website (www.ceridianethicshotline.com).

www.bvari.org

BVARI Ethics Reporting

To report ethics violations by BVARI employees, contact Ceridian at 888-279-1921 or at Ceridian's BVARI Ethics Hotline website. The ethics hotline provides a channel to report ethics issues outside of the BVARI reporting structure.

7.0 RELATED DOCUMENTS:

M.G.L.A. c. 151B, § 4(4).

Ceridian Contract for contracted services to support the Whistleblower Policy.

8.0 REVISION HISTORY

Revision Letter	Author	Revision Date	Description of Changes
A	Nancy Watterson-Diorio	12/12/2008	Original document
B	Nancy Watterson-Diorio	10/21/2013	Update with website information; attach Ceridian contract and modifications

REASON FOR ISSUE:

SUMMARY OF CHANGES:

Original document; Revision 10/22/2013

**RELATED DOCUMENTS: Ceridian Contract (Account #8619; 6/30/2008) and
Amendments dated 7/23/2008 and 5/14/2009)**

RESPONSIBLE OFFICER:

Director of Human Resources

**RECERTIFICATION: This policy is scheduled for recertification on or before the last
working day of October, 2018.**



Martin Abramson

Chairman of the Board

DISTRIBUTION Board of Directors, Date: November, 2013

FLD: Sharepoint Server November, 2013 E-mailed December, 2013 to:
BVARI Staff, Stakeholders; Announced on BVARI website December, 2013