

# Shadowfax

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Title	Reporting Concerns and No Retaliation Policy
Policy Number	ORG.1015.000.000
Initiating Authority	Policy Committee
Approved By	Compliance Committee
Origin Date	June 22, 2021
Revision Date	
Effective Date	July 1, 2021
Next Review Date	June 2022
Associated Policies	ORG.1003.Civil Rights, ORG.1007.000.000 Incident Management
Associated Procedures	
Associated Documents	

## I. POLICY STATEMENT

Shadowfax is committed to fair and equal treatment for all our staff and the individuals we serve. As part of that commitment, Shadowfax encourages the prompt reporting of concerns so that timely and constructive action can be taken resolve actual or perceived issues. Shadowfax also is committed to providing an environment when concerns may be raised in a constructive manner without fear of retaliation.

## II. PURPOSE

This policy provides guidelines on how to raise concerns to the organization, and Shadowfax's commitment to No Retaliation.

## III. SCOPE

This policy applies to all Shadowfax staff.

## IV. GENERAL

This policy is based on the standards set by Federal and State laws that prohibit retaliation for reporting concerns in good faith, such as, but not limited to, Title VII

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Note: The term "Individual" is synonymous with resident, client, patient, consumer, or participant.

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of the Civil Rights Act of 1964, the Pennsylvania Human Relations Act, the Americans With Disabilities Act of 1990, the Age Discrimination in Employment Act (ADEA) and the False Claims Act.

## V. **POLICY**

### Reporting Concerns

Anyone who believes they have experienced or witnessed conduct at Shadowfax not in line with the law, regulations or Shadowfax policies should discuss their concerns with their immediate supervisor, Human Resources or any member of senior leadership.

Shadowfax encourages the prompt reporting of concerns so that rapid and constructive action can be taken to resolve actual or perceived issues.

Complaints of discrimination may be filed with Shadowfax's Affirmative Action Officer, who is the Director of Human Resources (see ORG.1003.000.000 Civil Rights Policy)

Allegations that meet the standards outlined in Shadowfax's Incident Management policy will follow the policy's guidelines for reporting, response, and corrective action (see ORG.1007.000.000 Incident Management Policy).

### Investigations and Confidentiality

Reported concerns will be investigated promptly, in accordance with the nature and scope of the concern. Investigations may include, but are not necessarily limited to, paper and electronic records gathering and reviews, individual interviews with the parties involved, and interviews with individuals who may have observed the alleged conduct or may have additional relevant knowledge.

Shadowfax will maintain confidentiality throughout the investigation process to the extent allowable by law and to the extent that allows for appropriate investigation and corrective action.

### No Retaliation

Retaliation against an individual for reporting allegations of misconduct in good faith or for participating in an investigation of alleged misconduct in good faith is a violation of

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this policy and will be subject to disciplinary action up to and including termination. Alleged acts of retaliation should be reported immediately and will be promptly investigated and addressed. Likewise, intentionally false allegations of misconduct, as opposed to incorrect complaints that are made in good faith, will be subject to disciplinary action up to and including termination.

## Notification/Communication

New staffs will be provided a copy of this policy. Each Shadowfax department and/or program area shall create and maintain a procedure for providing new staff with this policy either in hard copy or electronic form.

## VI. **OVERSIGHT**

Shadowfax's Compliance Committee or their designee(s) (the "Approved By") shall be in charge of the administration of this Policy. The Approved By responsibilities include:

1. Identifying the action steps to come into compliance and directives to maintain compliance and implement the action steps.
2. Periodically reviewing this Policy and monitoring compliance to it.
3. Training responsible parties on their obligations under the Policy.

## Revision History

Name	Date	Reason for Changes	Version

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