



City of Lebanon
New Hampshire

ADMINISTRATIVE POLICIES & PROCEDURES

ANONYMOUS HOTLINE POLICY

<i>Policy Number</i>	<i>Effective Date</i>	<i>Last Revision</i>	<i>Page No.</i>
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<i>Approved by:</i>	DocuSigned by: <i>Shawn Mulholland</i>		

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Section 1.0: Purpose

The City of Lebanon is committed to the highest possible standards of ethical, moral and professional conduct. In conjunction with this commitment and the City's commitment to open communication, this policy aims to provide an avenue for employees to raise concerns and reassurance that they will be protected from reprisals or victimization for whistleblowing in good faith. However, if an employee feels that their anonymity is not required then they should follow our existing grievance procedure.

Section 2.0: Scope

This policy applies to all City employees, volunteers and contracted employees.

Section 3.0: Definitions

Anonymous Hotline- Contracted third party phone line and web application to be used by employees and anyone else for the purposes of reporting fraud, waste and/or abuse.

Section 4.0: Policy Detail

The whistleblowing policy is intended to cover serious concerns that could have a large impact on the City, such as actions that:

- May lead to incorrect financial reporting;
- Are unlawful;
- Are not in line with City policies, including the Ethics Policy; or
- Otherwise amount to serious improper conduct.

Regular business matters that do not require anonymity should be directed to the employee's supervisor and are not addressed by this policy.



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Section 5.0: Procedures

5.1 Reporting

The whistleblowing procedure is intended to be used for serious and sensitive issues. Serious concerns relating to financial reporting, unethical or illegal conduct, should be reported in either of the following ways:

- Website: www.lighthouse-services.com/clientwebname
- Toll Free: (800) xxx-xxxx
- E-mail: reports@lighthouse-services.com (must labeled "City of Lebanon" with report)
- Fax alternative for written documents: 215-xxx-xxxx (must labeled "City of Lebanon" with report)

Reporters to the hotline will have the ability to remain anonymous if they choose. Please note that the reported information may be the basis of an internal and/or external investigation into the issue being reported and the reporter's anonymity will be protected to the extent possible by law. However, the reporter's identity may become known during the course of the investigation because of the information provided. Reports are submitted by Lighthouse to the City or its designee, and may or may not be investigated at the sole discretion of the City.

Employment-related concerns should continue to be reported through normal channels such as an employee's supervisor, HR Director or to the City Manager (603-448-4220).

Timing

The earlier a concern is expressed, the easier it is for action to be taken.

Evidence

Although the reporter is not expected to prove the truth of an allegation, the employee submitting a report needs to demonstrate in their hotline report that there are sufficient grounds for concern.

5.2 How the Report will be handled



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The action taken will depend on the nature of the concern. The City Manager receives a copy of each report and follow-up reports on actions taken by the company. Reports filed in which the City Manager is alleged to be involved in Fraud, Waste or Abuse will be sent directly to the City's legal counsel for review and follow-up.

Initial Inquiries

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

Feedback to Reporter

Whether reported directly to City personnel or through the hotline, the individual submitting a report will be given the opportunity to receive follow-up on their concern:

- * Acknowledging that the concern was received;
- * Indicating how the matter will be dealt with;
- * Giving an estimate of the time that it will take for a final response;
- * Indicating whether initial inquiries have been made;
- * Indicating whether further investigations will follow, and if not, why not.

Further Information

The amount of contact between the individual submitting a report and the body investigating the concern will depend on the nature of the issue, the clarity of information provided, and whether the employee remains accessible for follow-up. Further information may be sought from the reporter.

Outcome of an Investigation

At the discretion of the City and subject to legal and other constraints, the reporter may be entitled to receive information about the outcome of an investigation.

5.3 Safeguards

Harassment or Victimization

Harassment or victimization of individuals submitting hotline reports will not be tolerated.

Confidentiality

Every effort will be made to protect the reporter's identity by our hotline vendor.



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Please note that the information provided in a hotline report may be the basis of an internal and/or external investigation by our company into the issue being reported. It is possible that as a result of the information provided in a report the reporter's identity may become known during the course of our investigation.

Anonymous Allegations

The policy allows employees to remain anonymous at their option. Concerns expressed anonymously will be investigated, 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.

Malicious Allegations

Malicious allegations may result in disciplinary action.

Section 6.0: References (Charter/Code/State Statues)

1. **State of NH RSA 275-E, Whistleblowers' Protection Act**
2. **Federal 29 CFR 1977, Asbestos Hazard Emergency Response Act, 15 USC 2651**
3. **Federal 29 CFR 24, Safe Drinking Water Act, 47 USC 300j-9(i)**
4. **Federal 29 CFR 24, Federal Water Pollution Control Act, 33 USC 1367**
5. **Federal 29 CFR 24, Solid Waste Disposal Act, 42 USC 6971**
6. **Federal 29 CFR 24, Clean Air Act, 42 USC 7622**
7. **Federal 29 CFR 24, Comprehensive Environmental Response, Compensation and Liability Act, 42 USC 9610**
8. **Federal 29 CFR 1984, Affordable Care Act, 29 USC 218c]**
9. **City of Lebanon 09-01-A, Anti-Harassment, EEO and Sexual Harassment Policy.**

Section 7.0: Policy & Procedure Revision History

	Section	Revisions	Date
Original Adoption			
Amendment			
Amendment			



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Amendment			
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