



# **Non-Retribution / Non-Retaliation Policy**

## **Background/Purpose**

The WOA has implemented an Integrity and Compliance Program that promotes the highest standard of ethical and legal conduct. Standards of conduct and procedures for staff, assigners, and officials are implemented to guide this effort.

The WOA believes that positive relations and morale with all covered individuals can be achieved and best maintained in an environment that promotes ongoing communication between assigners and officials. Open and candid discussion among all WOA covered individuals about any problems or concerns is encouraged.

The WOA believes that all covered individuals should express their problems, concerns, and opinions on any issue and that their views are important. To that end, a policy that will encourage covered individuals to communicate problems, concerns, and opinions without fear of retaliation or retribution will be implemented.

## **Policy**

1. All covered individuals are responsible for promptly reporting actual or potential wrongdoing, including an actual or potential violation of law, regulation, policy, or procedure.
2. WOA staff and assigners will act upon the concern promptly and in an appropriate manner.
3. The WOA Integrity and Compliance Hotline ([www.hotline-services.com](http://www.hotline-services.com)) will permit covered individuals to report anonymously and/or in confidence, to report problems and concerns or to seek clarification of compliance-related issues.
4. Covered individuals who report concerns in good faith will not be subjected to retaliation, retribution, or harassment.
5. No covered individual is permitted to engage in retaliation, retribution, or any form of harassment against another covered individual for reporting compliance-related concerns.
6. Covered individuals cannot exempt themselves from the consequences of wrongdoing by self-reporting, although self-reporting may be taken into account in determining the appropriate course of action.

## **Procedures**

1. Knowledge of actual or potential wrongdoing, misconduct, or violations of the Integrity and Compliance Program should be reported immediately to WOA staff, assigners, or via the hotline.
2. All assigners should maintain an open-door policy and take aggressive measures to assure their officials that the system truly encourages the reporting of problems and that there will be no retaliation, retribution, or harassment for doing so.
3. Officials should report concerns to their assigner, to WOA staff, or to the hotline.
4. All concerns will be investigated promptly.

Confidentiality regarding covered individuals' concerns will be maintained at all times insofar as legal and practical, informing only those who have a need to know.