



POLICY TITLE: Non-Intimidation and Non-Retaliation Policy	SYSTEM POLICY AND PROCEDURE MANUAL
POLICY #: 800.01	CATEGORY: Compliance and Ethics
System Approval Date: 9/6/18	Effective Date: 07/2009
Site Implementation Date: 10/16/18	Last Reviewed/Approved: 07/2016
Prepared by: Office of Corporate Compliance	Notations:

GENERAL STATEMENT of PURPOSE

The purpose of this policy is to establish a policy for Northwell Health prohibiting intimidation of and/or retaliation against anyone who participates in good faith in Northwell Health’s Compliance Program.

POLICY

It is the policy of Northwell Health to prohibit intimidation of and/or retaliation against any individual who participates in good faith in Northwell Health’s Compliance Program. Good faith participation in the Compliance Program includes, but is not limited to, reporting potential issues, investigating issues, self-evaluations, audits and remedial actions, and reporting to appropriate officials as provided in sections seven hundred forty and seven hundred forty-one of the New York Labor Law. Retaliation against or intimidation of any individual associated with Northwell Health also is prohibited by Northwell Health’s Code of Ethical Conduct, Northwell Health policy #800.09 - Detecting and Preventing Fraud, Waste, Abuse, and Misconduct, Northwell Health Human Resources policy 5-3 - Conduct in the Workplace/Progressive Discipline and Northwell Health policy #800.08 - Compliance Help Line.

SCOPE

This policy applies to all Northwell Health employees, as well as medical staff, volunteers, students, trainees, physician office staff, contractors, trustees and other persons performing work for or at Northwell Health; faculty and students of the Donald and Barbara Zucker School of Medicine at Hofstra/Northwell conducting research on behalf of the Zucker School of Medicine on or at any Northwell Health facility; and the faculty and students of the Hofstra Northwell School of Graduate Nursing and Physician Assistant Studies.

DEFINITIONS

N/A

PROCEDURE

1. Any individual who believes that he or she has been subject to intimidation and/or retaliation for good faith participation in Northwell Health’s Compliance Program must immediately report such intimidation and/or retaliation to the Corporate Compliance Officer, either in person at the Corporate Compliance Office, 200 Community Drive, Great Neck, NY, via telephone to the Corporate Compliance Office at (516) 465-8097 or by making a report to the Compliance Help-Line either by telephone at (800) 894-3226 or by visiting www.northwell.ethicspoint.com and filing a complaint online.

2. All reports of intimidation and/or retaliation relating to good faith participation in Northwell Health’s Compliance Program will be investigated by the Chief Corporate Compliance Officer or his/her designee. Upon conclusion of the investigation, the Chief Corporate Compliance Officer will make a report and recommendation for discipline, where appropriate, to the Chief People Officer, or his/her designee. The Chief Corporate Compliance Officer and the Chief People Officer and/or their designees shall confer and agree upon the discipline to be imposed.

3. Pursuant to the Human Resources’ Employee Conduct Policy, the possible sanctions that may be imposed on any individual who is found to have intimidated and/or retaliated against another individual include, but are not limited to, termination of employment.

REFERENCES to REGULATIONS and/or OTHER RELATED POLICIES

- Title 18, Part 521 of NYCRR
- Northwell Health Human Resources Policy 5-3 – Conduct in the Workplace/Progressive Discipline
- Northwell Health Code of Ethical Conduct
- Northwell Health Policy #800.09 - Detecting and Preventing Fraud, Waste, Abuse and Misconduct
- Northwell Health Policy #800.08 – Compliance Help Line

CLINICAL REFERENCES/PROFESSIONAL SOCIETY GUIDELINES

N/A

ATTACHMENTS

N/A

FORMS

N/A

<u>APPROVAL:</u>	
Northwell Health Policy Committee	7/26/18
System PICG/Clinical Operations Committee	9/6/18

Standardized Versioning History:

*=Northwell Health Policy Committee Approval; ** =PICG/Clinical Operations Committee Approval

07/14/09* 07/23/09** 06/30/16* 07/21/16**

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