



Matthew Kiamie
Board Chairman

The Institutes of Applied Human Dynamics, Inc.
Embracing Families, Enriching Lives

Omayra Andino
Chief Executive Officer

IAHD Whistleblower Policy and Procedures	Policy Manual: Corporate Compliance
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POLICY

The Institutes of Applied Human Dynamics, Inc. (“IAHD”) encourages all employees, directors and volunteers to report violations of statutes, regulations or internal policies, without fear of retaliation or intimidation. All concerns regarding suspected violations, unethical conduct or practices are to be reported upon discovery, confidentially, so that IAHD may investigate and correct inappropriate conduct and actions found, in accordance with the New York State Labor Law (NYS LAB) §740. Supervisors, officers, and fellow employees are prohibited from taking any intimidation or retaliatory actions against any employee who reports violations in good faith. Compliance requires the commitment of everyone at IAHD.

This policy is not intended as a vehicle for reporting violations of IAHD’s applicable human resources policies, problems with co-workers or managers, or reports of abuse, neglect or mistreatment against individuals supported by IAHD. These types of violations should be reported in accordance with IAHD’s personnel policies and procedures or IAHD’s Incident Reporting and Management policy. This policy supersedes all previously published Whistleblower Policies.

PURPOSE:

This document establishes IAHD’s “Whistleblower” policy and procedure, as well as protections for those employees, former employees, independent contractors, directors (heretofore referred to as “employees”) who reasonably believe an employer’s activity or conduct is a violation of laws, regulations, executive orders issued by the government, court rulings and decisions, or internal policies and procedures. Protections also include reporting of a violation which they reasonably believe poses a substantial and specific danger to health and safety, as outlined in NYS LAB §740

SCOPE:

This policy applies to the categories listed below. Throughout this document, they will collectively be referred to as “employees”:

- Current IAHD employees
- Former IAHD employees
- Board of Directors
- Independent contractors
- IAHD Volunteers

PROCEDURE:

An “employee” is expected to report when they reasonably believe that a violation has occurred of any laws, regulations, internal policies or that a practice or policy poses a substantial risk to the public health or safety, or the health and safety of the people supported by IAHD. Reports must be made in good faith and not as a retaliatory measure.

“Employees” are expected to notify a supervisor, department director or the IAHD Compliance Officer (collectively referred to as “employer”) of any concerns or violations or make a good faith effort to make such a notification.

If an “employee” feels they cannot notify the “employer” because they reasonably believe that a) there is imminent or serious danger to public health and safety, b) reporting to the “employer” would result in the destruction of information or concealment of wrong doing, or that harm would come to themselves, as reporters, or c) the supervisor is aware of the violation and the concern has not been corrected, the “employee” may then report to a public body, such as the state or federal legislative body, state or federal regulatory agency, or law enforcement.

Reports can be made anonymously and will always be kept confidential.

Concerns are reported as soon as practicable to a supervisor, officer or the **IAHD Compliance Officer**, Elizabeth K. Matthews. The Compliance Officer is responsible for ensuring the investigation of any concerns or issues reported pertaining to inappropriate practices, in violation of statutes, regulations and/or IAHD policies. Findings will be shared with the Chief Executive Officer, the Board Chair and the IAHD Corporate Compliance Committee.

Reports to the IAHD Compliance Officer may be made in the following ways:

Direct line: (914) 220-4383
Compliance Hotline: (914) 220-4397
Email: ematthews@iahdny.org

No “employee” who in good faith reports a concern shall suffer intimidation, harassment, retaliation, discrimination or adverse employment consequence because of reporting. Anyone who retaliates against someone for reporting a reasonably believed concern in good faith is subject to disciplinary action up to and including termination of employment.

“Employees” who do not report suspected violations in good faith, or who are aware of violations and do not report them, may also be subject to disciplinary action up to and including termination.

For any questions regarding this policy or procedures, please contact the Chief Quality Enhancement Officer, Elizabeth K. Matthews at (914) 220-4383 or ematthews@iahdny.org

Effective Dates:

Adopted by the Board: 6/19/2018

Revised: 1/21/22 - Revisions to correspond with changes to NYS LAB §740; sent for board approval