

## **IGD WHISTLEBLOWER POLICY**

### **Policy Statement**

It is the policy of St. Clair County to comply with all applicable State and Federal Acts. Employees and representatives of St. Clair County and IGD must practice honesty and integrity in fulfilling responsibilities and comply with all applicable laws and regulations. IGD, as Administrator of Workforce Innovation and Opportunity Act (WIOA) services, will not discharge, intimidate, retaliate, threaten, coerce or discriminate against any individual because an individual has:

- (1) Filed a complaint alleging a violation of Section 188 of WIOA or 29 C.F.R. Section 38.19;
- (2) Opposed a practice prohibited by the nondiscrimination and equal opportunity provisions of WIOA or C.F.R Section 38.19;
- (3) Furnished information to, or assisted or participated in any manner in an investigation, review, hearing or any other activity related to non-discrimination and equal opportunity, the exercise of authority under non-discrimination provision or the exercise of privilege secured by non-discrimination and equal opportunity provisions;
- (4) Otherwise exercised any rights and privileges under non-discrimination and equal opportunity laws and provisions.

### **Reporting process**

St. Clair County Intergovernmental Grants Department by management agreement acts as administrator and fiscal manager for Local Workforce Innovation Area 24 (LWIA 24) WIOA services. Employees of the St. Clair County Intergovernmental Grants Department are able to report violations or suspected violations of the Whistleblower Act to their immediate supervisor, Equal Opportunity Officer (EO) or the Executive Director. The reporting employee can exercise their choice in reporting based on their comfort level in communicating their concern. The EO Officer will function as the Intergovernmental Grants Department's compliance officer in relation to all Whistleblower Act issues and will investigate and move to resolution all formally reported complaints or allegations. Members of the Mid America Workforce Investment Board are also able to report suspected violations of the Whistleblower Act to the EO Officer or the Executive Director.

## **No Retaliation**

There will be no reprisals of any type (i.e., harassment, punitive actions, termination, retaliation, intimidation or coercion) to any reporting employee or board member. An employee who retaliates against someone who has reported a violation in good faith or taken any actions set forth in the policy statement above is subject to discipline up to and including termination of employment. This Whistleblower Policy is intended to encourage and enable employees, board members and others to raise serious concerns within the Department prior to seeking resolution outside the Department.

## **Acting in Good Faith**

Anyone filing a complaint concerning a violation or suspected violation of the Whistleblower Act must act in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Whistleblower Act. Any allegations that prove not to be substantiated and that prove to have been made maliciously or knowingly to be false will be viewed as an offense demanding serious action.

## **Resolution**

Employees are encouraged to bring their concerns to their immediate supervisor. Management staff is required to report suspected violations of the Code of Conduct to the Department's EO Officer, who has specific and exclusive responsibility to investigate all reported violations. However, if an employee is not comfortable speaking with their supervisor or they are not satisfied with their supervisor's response, they are encouraged to speak with the EO Officer or the Executive Director. If resolution does not occur at the Executive Director level the Executive Director will report unresolved complaints to the Director of Administration. Board members should report their complaints to the EO Officer or Executive Director. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

## **Confidentiality**

To the extent possible, all information received in connection with the filing, investigation, and resolution of allegations will be treated as confidential except to the extent it is necessary to disclose particulars in the course of the investigation or when compelled to do so by law.

## **Report of Outcome**

The EO officer will notify the complainant and respondent of the outcome of the investigation. Corrective actions as recommended by the EO Officer associated with any complaint will be implemented by the Executive director or the Director of Administration.