

# Onondaga County Resource Recovery Agency Whistleblower Policy

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## **General**

The Onondaga County Resource Recovery Agency Code of Ethics (“Agency Ethics Code”) requires directors, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of OCRRA, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

## **Reporting Responsibility**

It is the responsibility of all directors, officers and employees of OCRRA to comply with the Agency Ethics Code and to report violations or suspected violations in accordance with this Whistleblower Policy.

## **No Retaliation**

No OCRRA director, officer or employee who in good faith reports a violation of the Agency Ethics Code shall suffer harassment, retaliation or adverse employment consequence. “Employees” of our Agency includes, but is not limited to, full time and part-time employees, those employees on probation and temporary employees. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within OCRRA prior to seeking resolution outside OCRRA.

## **Reporting Violations**

The Agency Ethics Code addresses OCRRA’s open door policy and suggests that employees share their questions, concerns, suggestions or complaints with someone who can address them properly. Employees are encouraged to disclose information concerning acts of wrongdoing, misconduct, malfeasance, violations of criminal or regulatory laws, or other inappropriate behavior by an employee, board member or manager of OCRRA. In most cases, an employee’s supervisor is in the best position to address an area of concern. However, if you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor’s response, you are encouraged to speak with the Agency Personnel Analyst or anyone in management whom you are comfortable in approaching.

Supervisors and managers are required to report suspected violations of the Agency Ethics Code to OCRRA’s Ethics Officer, who has specific and exclusive responsibility to investigate all reported violations. For suspected fraud, or when you are not satisfied or uncomfortable with following OCRRA’s open door policy, individuals should contact OCRRA’s Ethics Officer or Audit Committee directly.

## **Ethics Officer**

OCRRA’s Ethics Officer, our Confidential Internal Controls Compliance Officer, is responsible for investigating all reported complaints and allegations concerning violations of the Agency Ethics Code. The Agency Ethics Officer will advise the Audit Committee of any complaints or allegations involving fraud, internal controls, accounting or auditing matters and the results of that investigation. The Ethics Officer should forward information regarding suspected ethics violations with an investigative report to the Audit Committee and to the Executive Director.

## **Suspected Fraud, Accounting and Auditing Matters**

The Audit Committee of the Board of Directors shall address all reported concerns or complaints regarding Agency accounting practices, internal controls, suspected fraud or auditing. The Chair of the Audit Committee shall immediately notify the Audit Committee of any such complaint and work with the Committee until the matter is resolved.

## **Acting in Good Faith**

The Agency will not fire, discharge, demote, suspend, threaten, harass or discriminate against an employee because of the employee's role as a whistleblower provided the employee's own actions are legal and the whistleblowing employee was acting in good faith. Anyone filing a complaint concerning a violation or suspected violation of the Agency Ethics Code must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Agency Ethics Code. Any allegations hereunder that are made for malicious reasons where the complainant actually knows in advance that they are false will be viewed as a serious disciplinary offense.

## **Confidentiality**

Ethics violations or suspected ethics violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

## **Handling of Reported Violations**

The Agency Ethics Officer will, in a confidential manner, acknowledge receipt of any reported ethics violations or suspected ethics violations within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

In the handling of reported complaints other than violations or suspected violations of the Agency's Code of Ethics that come to the Confidential Internal Control Compliance Officer (CICCO), the CICCO shall immediately notify the Audit Committee of such complaint and work with them to determine the level of investigation, if any, is warranted.

Adopted by Resolution No. 1389, of September 8, 2004  
Amended by Resolution No. 1465, of December 14, 2005  
Amended by Resolution No. 1468, of February 8, 2006  
Amended by Resolution No. 1692, of February 10, 2010  
Amended by Resolution No. 1771, of December 14, 2011  
Amended by Resolution No. 1877, of March 19, 2014

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