

Kids Central, Inc. System of Care Policy & Procedure

Series: Human Resources

Policy Name: Reporting Irregularities – Whistle Blowing

Policy Number: 1105

Origination Date: 02/20/2007

Revision Date: 06/24/2013

Authority: Whistleblower Protection Act of 1989; Florida Private Sector Whistleblower Act, Fla. Stat. 448.101-448.105; Florida Public Sector Whistleblower's Act, Fla. Stat. 112.3187-112.31895;

Policy:

Kids Central, Inc. is committed to the highest standards of integrity, openness and accountability in all of its affairs. In line with this commitment, we strongly support and encourage employees to voice concerns about observed irregularities. Kids Central will promptly investigate concerns and follow-up with necessary corrections.

This policy applies to any irregularity, suspected or real, involving employees and board members as well as consultants, vendors, providers, contractors, outside agencies and any other parties with a business relationship to Kids Central.

While irregularities do not in themselves prove illegal or fraudulent acts have occurred, they are often indicators that company policies are not being followed and therefore, all reported irregularities will be investigated. Any investigative activity required will be conducted without regard to the suspected wrongdoer's length of service, position, title or relationship to Kids Central.

Procedure:

Definition of Irregularities

Irregularities are activities, behaviors or situations that normally do not occur within the regular conditions that business is conducted at Kids Central. Irregularities can be obvious violations of company policies, violations of law, rule, or regulation that creates substantial and specific danger to the public's health, safety or welfare or for disclosing information about improper use of government funds, gross waste of funds, or any other abuse or gross neglect of duty; however irregularities can also be subtle indications that something is just not right, such as an employee behaving strangely. When considering what may or may not be an irregularity, employees should report any conditions that they know are improper and also rely on their intuition and report any conditions that make them sense something irregular may be occurring.

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Method for Reporting Irregularities

Ideally, employees should report irregularities internally at Kids Central and there are several mechanisms for doing so as follows:

1. Employees can report irregularities to their direct supervisor.
2. Employees can report irregularities to any member of executive management team. For the purposes of this policy, executive management is defined as the Chief Executive Officer, Chief Financial Officer, Chief of Operations, and Deputy Chief of Programs and Prevention.
3. Employees may file a complaint with Human Resources.
4. Employees may use the Integrity in Action reporting hotline (877-882-5546) if they wish to remain anonymous.

Kids Central recognizes some situations may arise that make internal reporting inappropriate. In these situations, employees can report irregularities to the following sources:

1. Employees may call the Florida Office of Inspector General Whistle-blower's Hotline, Post Office Box 151, Tallahassee, Florida, 32302: Hotline Number: 1-800-543-5353.
2. Employees may file a complaint with the Office of Chief Inspector General, Room 2013 – The Capitol, Tallahassee, FL 32399-0001, 850-717-9264. Email: cig@eog.myflorida.com.
3. Employees may file a complaint with The Department of Children and Families Agency Inspector General, 1317 Winewood Blvd., Bldg. 5, Second Floor, Tallahassee, Florida, 32399-0700, 850-488-1225.
4. Employees may file a complaint with the Florida Commission on Human Relations, 2009 Apalachee Parkway, Suite 100, Tallahassee Florida, 32301, 850-488-7082, email: fchrinfo@fchr.myflorida.com.

Kids Central recognizes the decision to report a concern can be a difficult one to make. An individual may even fear reprisal from those being reported. In order to alleviate these concerns, the following safeguards will be used.

- The company will not tolerate any harassment, retaliation or victimization and will take action to protect those who raise a concern in good faith.
- The company will do its best to protect an individual's identity when a concern is reported and the originator does not want their name disclosed. However, it must be understood the investigation process may reveal the source of the

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information and a statement by the individual may be required as part of the evidence.

- The company encourages individuals to put their names to allegations. Concerns expressed anonymously are much less powerful, but they will be considered at the discretion of the company. In exercising this discretion, the company will consider factors such as, the seriousness of the issues raised, the credibility of the concern and the likelihood of confirming the allegation from reliable sources.
- If an allegation is made in good faith, but not confirmed by the investigation, no action will be taken against the originator. If however, an individual makes malicious or purely vindictive allegations, action may be considered against the individual making the allegation.
- Any investigative activity required will be conducted without regard to the suspected wrongdoer's length of service, position, title or relationship to Kids Central.

D. Response to Reported Irregularities

Within 5 working days of a concern being received, a member of the executive management team will write to the complainant:

- Acknowledging the concern has been received.
- Indicating how it proposes to deal with the concern
- Giving an estimate of when a final response can be provided.
- Informing if any initial enquiries have been made.
- Explaining if further investigation will take place, and if not, why not.

All reported irregularities and concerns will be investigated by Kids Central. Concerns that have the potential for uncovering illegal acts or material levels of fraud may also be referred to the police. The company will also seek legal advice if a significant illegal act or fraud is suspected.

If a significant loss has occurred due to fraud, Kids Central will also seek legal assistance about recovering the loss from the perpetrator. The company would normally expect to recover costs in addition to losses.

Approved By:

John Cooper, CEO

Date