

Guidance for Managers Receiving a Report

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Under the Code, as a manager, you have special responsibilities when an issue is escalated to you. The Code states:

Be responsive to anyone who raises an ethics or compliance concern. Keep an open door for concerns. Escalate to the Chief Risk and Compliance Officer violations of this Code, make sure that action is taken, and ensure concerns are resolved in a fair and appropriate manner.

Here is some broader guidance for managers receiving complaints.

- Always - If you have any questions talk to Charlotte. Bounce questions off her, ask hypotheticals – no question is a wrong question.
 - Is this a conflict of issue?
 - Should I be concerned about this employee's time sheets?
 - Do you think this is possible fraud?
 - Is this a harassment issue?
 - What is the rule on how we post on social media?
 - Do we have safeguarding policies in the Code?
 - A staff told me x – is that an issue I can handle?
 - I think I can handle this particular issue – is that OK?
 - I'm not even sure if this is a compliance issue – can you help?

- If it is a minor issue (not a legal issue, not a violation of the Code) then you can manage it yourself – such as a performance issue (there you might need help from HR).
 - X is not happy with his/her performance review
 - X is not recording vacation properly (this may turn into fraud -then call Charlotte)
 - X and Y are not getting along
 - X is gossiping too much
 - X has a benefits complaint (unless it raises a legal issue you can handle it)

- But if it is a compliance issue – the Code is not being followed, or it is a violation of law – you should escalate to Charlotte.

- If it is raised to you confidentially, and you still have questions, find a way to raise it to Charlotte without identifying the reporter. Options:
 - "I need to talk to Charlotte about this. I won't give her your name if that is an issue for you. Are you OK with that?"
 - "This has to be reported. DO you want to talk to Charlotte directly or want me to go to her on your behalf? What is OK for me to say?"
 - "This has to be escalated, it is a serious concern. If you don't want me to report it – will you commit to reporting it on the Hotline, you can do that anonymously?"

- ALWAYS follow up. Make sure the reporter knows you are taking it seriously; and tell the reporter what you will so; and what you did after.

- “I promise you I will look into this.”
 - “I have looked into your concern, I raise it with Charlotte, and she will get back to you. Tell me if she does not.”
 - Sometimes the result, if it is discipline of another staffer, cannot be shared. “This was investigated. I can’t tell you how it ended as the result is confidential – but I promise you Winrock took it serious and we addressed the issue.”
- Finally, if it is discrimination or harassment you have no option - the Code states that you have to escalate to Charlotte.