



ANNA
American Nephrology
Nurses Association

Policy	2.17
Revised Policy	9/18
Revised Procedure	9/22
Bylaws & Policy Committee	8/24
BOD Reviewed and Approved ...	9/24
DEI Reviewed	2022-23
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POLICY & PROCEDURE

WHISTLEBLOWER POLICY

POLICY

This Whistleblower Policy provides Board of Director (BOD) members, chapter officers, committee members, Specialty Practice Network (SPN) members, the American Nephrology Nurses Association (ANNA) Chapter Support Team (ACST) members, members, and other volunteers with a means for reporting in good faith suspicion of unethical, unlawful, or other inappropriate activities. The policy also aims to reassure such individuals that they will be protected from reprisal or victimization as a consequence of reporting the alleged wrongdoing of any management company employee, BOD member, chapter officer, committee member, SPN/ACST member, member, or other volunteer/agent of ANNA. ANNA is committed to high standards of ethical, moral, and legal business conduct. ANNA is further dedicated to acting in good faith with those individuals who raise concerns.

ANNA has zero tolerance for retaliation. No management company employee, BOD member, chapter officer, committee chairperson, SPN leader or advisor, ACST leader, member, or volunteer/agent of ANNA shall take any harmful action with the intent to retaliate against any individual, including abuse, harassment, threats, discrimination or any adverse employment consequences as a result of like reporting in good faith suspicion of unethical, unlawful, or other inappropriate activities to an elected or appointed official of ANNA or regulatory official.

1. Harassment or Victimization – ANNA will not tolerate the harassment or victimization of any member who raises concerns under this policy.
2. Confidentiality – ANNA will make every effort to treat a complainant’s identity with an appropriate regard for confidentiality, with the understanding that the details of complaints may need to be shared with others in order to investigate such complaints properly.
3. Anonymous Allegations – Because a thorough investigation often depends on an ability to gather additional information, ANNA encourages complainants to put their names to allegations of wrongdoing. ANNA will explore anonymous allegations to the extent possible, but will weigh the prudence of continuing such investigations against the likelihood of confirming the alleged facts or circumstances from attributable sources.

4. Bad Faith Allegations – Reporting in good faith suspicions of illegal, unethical, or other inappropriate activities without fear of retaliation is encouraged; however, individuals who make unfounded allegations that are proven to be made recklessly, maliciously or with the foreknowledge that the allegations were false may be subject to administrative action. Allegations made in bad faith may result in termination of employment or membership and removal from elected office, as applicable.

PROCEDURE

1. Process for Raising a Concern:

- a. Reporting – ANNA intends this policy to be used for serious and sensitive issues. Such concerns, including those relating to financial reporting or unethical or illegal conduct, should be reported directly to the National President and/or Executive Director. In the event that an individual's concern rises to the level that they reasonably believe that notice to the National President and/or Executive Director will be disregarded or otherwise not fairly considered, the individual may then report violations or suspected violations either to the National President-Elect or National Immediate Past President.
- b. Timing – The earlier a concern is expressed, the easier it is to validate.
- c. Evidence – Although a complainant is not expected to prove the truth of an allegation, they should be able to demonstrate that they have made a report in good faith.

2. How the Report of Concern Will Be Handled:

- a. Initial Inquiries – The National President will make initial inquiries in consultation with legal counsel, if necessary, to determine whether or not further investigation is necessary or appropriate. If the concern is brought to the Executive Director, National President-Elect, or National Immediate Past President they will make initial inquiries in the same manner as stated above.
- b. Further Information – The National President, Executive Director, National President-Elect, or National Immediate Past President may seek further information from any BOD member, officer, volunteer, or agent of ANNA, and shall take all reasonable precautions to protect the identity of the complainant to the extent possible while doing so.
- c. Reporting – The BOD shall receive information on each complaint. In consultation with the Executive Director and, if necessary, legal counsel, the BOD will determine an appropriate response to a report of concern. Officers, directors, employees, and agents of ANNA who may be implicated in such reports shall not participate in any deliberation of the BOD related to the complaint, except to present information directly to the BOD on their own behalf.