



City and County of San Francisco
London N Breed, Mayor

San Francisco Department of Public Health

Grant Colfax, MD
Director of Health

San Francisco Department of Public Health

Policy & Procedure Detail*

Policy & Procedure Title: Compliance Program – Employee Non-Retaliation Policy (COM)	
Category: Compliance	
Effective Date: April 2007	Last Reissue/Revision Date: May 24, 2023
DPH Unit of Origin: Compliance	
Policy Contact - Employee Name and Title; and/or DPH Division: Office of Compliance and Privacy Affairs	
Contact Phone Number(s): (855) 729-6040	
Distribution: DPH-wide <input checked="" type="checkbox"/>	If not DPH-wide, other distribution:

*All sections in table required.

1. Purpose of Policy

It is the policy of the Department of Public Health that employees, who report actual or alleged compliance violations or concerns, are protected from any form of discrimination, harassment or retaliation within the organization. For the purpose of the policy, “compliance violations” means any allegation reported to the Office of Compliance and Privacy Affairs related to compliance, privacy, code of conduct, or City Conflict of Interest Code violations.

2. Policy

The Department of Public Health has adopted this non-retaliation policy to ensure that employees who report known or alleged Compliance Program violations may do so without fear of discrimination, harassment, or retaliation from superiors, peers or subordinates within the organization. Under this policy:

1. All employees have a duty and responsibility to report perceived misconduct, including actual or potential violations of laws, regulations, policies, procedures, or this organization’s standards/code of conduct, as a potential compliance issue.
2. An “open-door policy” will be maintained at all levels of management to encourage employees to report problems and concerns.

The mission of the San Francisco Department of Public Health is to protect and promote the health of all San Franciscans.

We shall ~ Assess and research the health of the community ~ Develop and enforce health policy ~ Prevent disease and injury ~
~ Educate the public and train health care providers ~ Provide quality, comprehensive, culturally-proficient health services ~ Ensure equal access to all ~

3. Employees should also proceed up their department's chain-of-command when reporting compliance violations. Human Resource issues should be reported directly to that department, and not to the Compliance Unit, if there is no compliance violation involved.
4. Employees are encouraged to utilize the **Compliance, Ethics and Privacy Hotline at (855) 729-6040** for issues they do not want to bring to their department managers. As extended protection against retaliation, callers may remain anonymous. All reports are kept confidential.
5. Any form of retaliation against any employee who reports a perceived problem or concern in good faith is strictly prohibited. Any employee who commits or condones any form of retaliation will be subject to discipline.
6. Any indication of a violation of this non-retaliation policy should be reported to the Compliance Officer. All allegations of retaliation will be referred to the San Francisco Ethics Commission for investigation.
7. Employees cannot exempt themselves from the consequences of their own misconduct by reporting the issue, although self-reporting may be taken into account in determining the appropriate course of action.

Limited Disclosure

The identity of any person who reports alleged illegal or improper conduct to the Compliance Officer shall be disclosed, only on a need-to-know basis, except as required by law. Disclosure of reports of possible illegal or improper conduct shall be made, only on a need-to-know basis, or as required by law. Unauthorized disclosure of proprietary information may be grounds for disciplinary action.