



## CITY OF PROVIDENCE

### 2.5 WHISTLEBLOWER – ANTI-RETALIATION POLICY

#### Purpose

The purpose of this Whistleblower Policy is to encourage employees and contractors to report concerns about illegal, unethical, and/or inappropriate conduct within the City of Providence. Additionally, this policy aims to protect whistleblowers from retaliation and ensure that reports are handled with integrity and confidentiality.

#### Scope

This policy applies to all employees, fellows, interns, contractors, and any third party who have a business relationship with the City of Providence. It covers concerns related to illegal activities, ethical breaches, and/or other violations of City policies.

Nothing in this policy shall supersede, modify, or diminish any rights, benefits, or obligations contained within applicable collective bargaining agreements (CBAs) or laws. In the event of a conflict between this policy and a CBA, the CBA shall prevail for covered employees. For all other employees not covered by a CBA, this policy shall govern.

#### Definitions

**Whistleblower:** An individual who reports or discloses information about suspected wrongdoing or unethical behavior within the City.

**Wrongdoing:** Activities or behaviors that violate laws, regulations, and/or City policies, including but not limited to fraud, corruption, theft, harassment, discrimination, safety, and/or violation(s).

#### Policy

The City of Providence is committed to maintaining the highest standards of ethical conduct and compliance with legal requirements. We encourage anyone with knowledge of wrongdoing to report their concerns. The City prohibits retaliation against anyone who reports in good faith or participates in an investigation.

#### 1. Reporting Mechanisms

##### A. Internal Reporting

1. Employees are encouraged to contact the City's HR Hotline via the Department of People and Culture
  1. Via email: [HRHotline@providenceri.gov](mailto:HRHotline@providenceri.gov)
  2. Or via phone: (401) 680-5714
2. Additionally, employees are encouraged to contact the City's Municipal Integrity Officer for assistance related to ethics complaints/concerns:
  1. Via email: [rperry@providenceri.gov](mailto:rperry@providenceri.gov)
  2. Or via phone: (401) 680-5333

##### B. Anonymous Reporting

1. The City of Providence provides a mechanism for anonymous ethics reporting through 844.9ETHICS (844-938-4427) or by going to [www.providenceri.gov/ethics/contact-ethics/](http://www.providenceri.gov/ethics/contact-ethics/)
2. While anonymous reports may be submitted, providing contact information is encouraged to allow for follow-up and resolution.

#### 2. Handling of Reports

##### A. Investigation Process



## CITY OF PROVIDENCE

1. All reports will be investigated promptly and thoroughly. The investigation will be conducted with respect to confidentiality and fairness.
2. The extent and method of investigation will be determined based on the nature and seriousness of the report.
- B. **Confidentiality**  
The identity of the whistleblower and the details of the report will be kept confidential to the extent possible and required by law. Disclosure will be limited to those involved in the investigation, personnel with a need-to-know, or those required by law.
3. **Protection Against Retaliation**
  - A. **Non-Retaliation**
    1. The City of Providence strictly prohibits retaliation against anyone who reports concerns in good faith or cooperates with an investigation.
    2. Retaliation includes but is not limited to adverse employment actions such as termination, demotion, harassment, or discrimination.
  - B. **Reporting Retaliation**  
If an individual believes they have been subjected to retaliation for making a report and/or participating in an investigation, they should report the retaliation to the Municipal Integrity Officer or the Department of People and Culture. Such complaints will be investigated and addressed accordingly.
4. **Responsibilities**
  - A. **Employees**  
Employees are encouraged to report concerns as outlined in this policy and shall cooperate with investigations. They should act in good faith and provide accurate and factual information.
  - B. **Management**
    1. Department chiefs, directors, supervisors, and managers are responsible for ensuring that employees are aware of and understand this policy.
    2. They must also report any concerns that come to their attention and cooperate with investigations.
  - C. **Municipal Integrity Officer**  
The Municipal Integrity Officer is responsible as the City's MIO for encouraging officials and employees of the City to act in an ethical manner and ensure continuous compliance of this policy, managing the ethics reporting and investigation process, and ensuring compliance with legal requirements.
  - D. **Department of People and Culture (Human Resources)**  
The Department of People and Culture are responsible for the implementation and workforce compliance of this policy, as well as the management of workplace investigations conducted in conjunction with the personnel system of the City of Providence, as allowed by regulatory, procedural, and compliance standards.
5. **Compliance**
  - A. Employees found in violation of this policy will face progressive disciplinary action, in line with the City's disciplinary procedures as applicable to the standard of policy, regulation, and/or ethics violation identified and sustained.
  - B. There is a zero-tolerance for retaliation. Department chiefs, directors and supervisors are responsible for ensuring compliance with this policy within their respective departments.

### **Related Policies:**

Code of Conduct  
Non-Discrimination and Anti-Harassment Policy  
Ethics Guide  
Additional Employment Disclosure Policy  
Workplace Violence Policy  
Criminal Background Disqualification Policy