

Lighthouse Whistleblower Reporting policy

1. Purpose: The purpose of this policy is to:
 - a. Encourage employees to report suspected illegal, dishonest, fraudulent or unethical activities.
 - b. Establish clear procedures for reporting concerns.
 - c. Protect employees who report in good faith from retaliation.
 - d. Ensure compliance with applicable state and federal law, including the Defend Trade Secrets Act (DTSA) and Wis. Stat. § 134.90.
2. Definitions: For purposes of this policy:
 - a. *Whistleblower:* an employee of Rusk County who reports an activity that he/she reasonably believes to be illegal, dishonest, fraudulent, or otherwise in violation of law or County policy.
 - b. *Whistleblower Report:* A good-faith report of suspected illegal, dishonest, fraudulent, or grossly unethical activity that could result in financial loss, legal liability or reputational harm to Rusk County. Examples include, but are not limited to:
 - i. Violations of federal, state, or local laws.
 - ii. Billing for services not performed or goods not delivered.
 - iii. Fraudulent financial reporting.
 - iv. Misuse or theft of County funds or property.
 - v. Corruption, bribery, or conflicts of interest.
 - c. *Non-Whistleblower Complaint:* Matters related to personal grievances, workplace disagreements, supervisory style, or employee performance. Examples include, but are not limited to:
 - i. "My manager is mean."
 - ii. "My coworker doesn't know what they're doing."
 - iii. "I saw someone leave early without asking."These issues are not whistleblower matters and must be addressed through existing personnel policies, Human Resources, or the County's complaint procedure.
 - d. *Retaliation:* Any adverse employment action taken against an employee for submitting a whistleblower report in good faith. This includes termination, demotion, reduction in compensation, elimination of job responsibilities, reassignment to less desirable duties, threats, or harassment.
 - e. *Trade Secret:* As defined by 18 U.S.C. § 1839(3) and Wis. Stat § 134.90(1)(c), all forms and types of financial, business, scientific, technical, economic, or engineering information, including patterns, plans, compilations, program devices, formulas, designs, prototypes, methods, techniques, processes, procedures, programs, or codes, whether tangible or intangible, and whether or how stored, compiled, or memorialized physically, electronically, graphically, photographically, or in writing, if:
 - i. The owner has taken reasonable measures to keep such information secret; and
 - ii. The information derives independent economic value from not being generally known or readily ascertainable through proper means by another person.
3. Policy Statement:

- a. Employees have a duty to report suspected whistleblower matters as defined in this policy.
 - b. Whistleblowers are not responsible for investigating or determining corrective action; this responsibility rests with appropriate management officials.
 - c. Employees must exercise sound judgement and avoid baseless allegations. Employees who intentionally file false reports will be subject to disciplinary action, up to and including termination.
4. Procedure:
- a. Reporting:
 - i. Employees should utilize the Lighthouse Hotline for reporting suspected violations of law, fraud, misuse of County funds, theft, corruption, or other serious misconduct.
 - ii. Reports of ordinary workplace disagreements, supervisory issues, or personnel matters are not appropriate for the Hotline and should instead be submitted through established County complaint procedures.
 - b. Confidentiality:
 - i. Insofar as possible, the confidentiality of the whistleblower will be maintained. However, identity may have to be disclosed to conduct a thorough investigation, to comply with the law, and to provide accused individuals their legal rights of defense.
 - c. Anti-Retaliation:
 - i. Rusk County will not retaliate against an employee who reports a concern in good faith.
 - ii. Any employee who believes they are being retaliated against must report this immediately to the Human Resources Manager.
 - iii. Protection from retaliation does not extend to personal wrongdoing alleged against the whistleblower.
 - d. Handling of Reports:
 - i. All Hotline reports are logged through the Lighthouse.
 - ii. Each report is automatically sent to Corporation Counsel, the Administrative Coordinator, and the Human Resources Manager and will be reviewed within three business days to determine whether it falls within the scope of this policy.
 1. Reports alleging fraud, illegality, or serious misconduct will be investigated.
 2. Reports that do not qualify as whistleblower matters will be redirected to the appropriate department head or oversight committee chair to determine next steps.
 3. The Human Resources Manager will ensure that every whistleblower report is documented within a confidential file.
 4. To the extent permitted by law, the County will communicate to the reporting party that the report was received. Specific outcomes may not be shared due to confidentiality or personnel rules.

5. A summary of Hotline activity will be provided monthly to the Personnel Committee, with confidentiality maintained, but will include: a listing of each report received with the date reported, incident type, nature of report, last updated on, and last updated by.
5. Defend Trade Secrets Act (DTSA) Compliance: In accordance with DTSA, employees are granted immunity from liability for the confidential disclosure of a trade secret when made:
 - a. To a federal, state, or local government official, or to an attorney, solely for the purpose of reporting or investigating a suspected violation of law; or
 - b. In a complaint or other document filed in a lawsuit or proceeding, if filed under seal.Employees may also disclose trade secret information to their attorney in connection with an anti-retaliation lawsuit, provided that any filings containing trade secrets are submitted under seal and not disclosed except by court order.