

## Employee Concerns Program

Laboratory-Wide Argonne Procedure LMS-PROC-342 Rev. 0

Effective Date: 07/26/2019

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### 1 Purpose

Establish the process for accepting, processing, and resolving employee concerns in a timely manner.

### 2 Scope

This procedure applies to the following Argonne activities and entities.

LMS core processes:	Human Resources
Organizations:	all
Buildings:	all
Specific locations:	all
Other applicability factors:	Non-employees are eligible to raise concerns related to the Laboratory's operations and programs pursuant to this procedure.
Exclusions:	none

### 3 Work Process

#### 3.1 Introduction

This procedure defines the Laboratory's process for addressing concerns raised by any current employee of UChicago Argonne, LLC, working for or supporting a DOE or NNSA project, including any subcontractor employee. Collectively, the steps of this procedure define the Laboratory's Employee Concerns Program (ECP).

An employee concern is a good faith expression by a concerned individual that an activity, policy, or practice of the Laboratory including, but not limited to, that which is related to the environment, safety, health, security, quality, and management of facilities and/or operations, should be improved, modified, or terminated. Concerns also include situations where an individual is subjected to harassment, intimidation, retaliation/reprisal, or discrimination (HIRD) for expressing a concern. The Laboratory strictly forbids retaliation of any kind against anyone who raises an employee concern.

#### 3.2 Step-by-Step Procedure

The steps below are mandatory unless noted otherwise.

Step	Job Role	Action
1	Concerned individual	<p>If you have a good faith employee concern, notify the <a href="#">Employee Concerns Program manager</a>.</p> <p>You may also make a report through <a href="#">Navex Global</a>, an independent reporting service that allows employees to communicate, anonymously if they wish, via the <a href="#">internet</a> or by telephone (1-877-587-2449), 24 hours a day, 7 days a week.</p> <p><b>Recommendation:</b> Make your report as detailed as possible, including events, dates, location, and the names of all individuals involved and any witnesses. Make your complaint as soon as possible to help the Laboratory perform an effective</p>

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		<p>investigation.</p> <p>Please note that the ECP manager will maintain confidentiality to the greatest extent possible with regard to each employee concern, but the ECP manager will also advise concerned individuals about the limits of confidentiality in connection with this process.</p> <p>If you do not want to formally pursue an employee concern through this procedure (which triggers notice to the Laboratory and an official examination of the concern), you may discuss the matter confidentially and informally with the Laboratory's <a href="#">Ombuds Office</a>, which can provide you with information and guidance on potential options.</p>
2	ECP manager	<p><b>Note:</b> Functions of the ECP manager report and are accountable to the chief human resources officer.</p> <p>3.1 When a concerned individual initiates an employee concern, hold an intake interview with the concerned individual to clearly understand and document the employee concern.</p> <p>3.2 Track, document in a case file system, process, and resolve employee concerns in a timely manner. Concerned individuals may withdraw an employee concern at any time prior to resolution.</p> <p>3.3 Investigate the employee concern by reviewing relevant information, including conducting interviews. Maintain confidentiality to the greatest extent possible in this investigation.</p> <p>3.4 If you do not have the underlying subject matter expertise or access to investigate and resolve an employee concern, you may refer the matter to a subject matter expert with an established protocol to process and resolve the employee concern.</p> <p>3.5 If an employee concern appears suitable for voluntary informal resolution or alternative dispute resolution, you may suggest such voluntary resolution to the concerned individual.</p> <p>3.6 Determine a resolution to each processed and investigated employee concern, which includes a finding as to whether the employee concern is substantiated or unsubstantiated. Communicate the resolution to the concerned individual in writing while appropriately protecting confidentiality for all parties involved.</p> <p>3.7 To the extent any employee concerns identify corrective actions or other management issues, brief relevant management on any issues for management attention.</p>
4	ECP manager	<p>Inform the Laboratory community about the ECP.</p> <p>The ECP manager will also be responsible for all ECP anonymized summary reporting, notifications, assessments and corrective actions required by DOE.</p>

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### 4 Records Created by Work Process

The records listed below must be retained as indicated.

Description of Record	Custodian	Storage Medium	Location, Arrangement, Dates	Federal Retention Requirement*
ECP case file including, but not limited to, any supporting documentation and/or evidence provided by the concerned individual, or obtained or prepared by the ECP manager.	HRS-ER staff	Digital: system of record	Legal Tracker system; index by employee name and case number; 2019 forward	<p>Official ECP Files:</p> <ol style="list-style-type: none"> <li>1. Security, environment, safety, and health-related – Destroy after 75 years from the end of fiscal year of resolution (ADMIN 1.43.a.1);</li> <li>2. All other concerns – Destroy after 4 years from the end of fiscal year of resolution (ADMIN 1.43.a.2).</li> </ol> <p>Concerns not resulting in official ECP cases:</p> <ol style="list-style-type: none"> <li>1. Security-related – Destroy after 4 years from the end of fiscal year of resolution (ADMIN 1.43.b.1);</li> <li>2. All other concerns - Destroy after 2 years from the end of fiscal year of resolution (ADMIN 1.43.b.2).</li> </ol>

\*If records are maintained in a business information system that is not currently programmed to purge digital records based on age, the records may be retained in that system past the indicated destruction date.

### 5 Related Documents

This procedure implements requirements established by the following basis documents:

- DOE Order O 442.1B (Department of Energy Employee Concerns Program), Contractor Requirements Document.

### 6 Definitions

[alternative dispute resolution \(ADR\)](#)

[discrimination](#)

[harassment](#)

[harassment, intimidation, retaliation/reprisal, or discrimination \(HIRD\)](#)

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[intimidation](#)

[retaliation/reprisal](#)

### 7 About this Procedure

Issuing LMS core process:	Human Resources
Issuing organization:	Office of the Laboratory Director
Final approver:	Julie Nuter
Point of contact:	Darryl Howe
Review cycle (months):	36
Date last revised:	July 26, 2019
Date last reviewed:	July 26, 2019

### 8 Summary of Changes in This Version

This is the first edition of the Laboratory Employee Concerns Program.