



# Town of Londonderry, New Hampshire

## Administrative Policies and Procedures

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Policy Title: **Anonymous Hotline Policy**

Policy Number: ADM-111

Original Adoption Date: 7/25/25

Revision Date:

Approved by: Shaun Mulholland

Signed by:

*Shaun Mulholland*

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### Section 1.0: Purpose

The Town of Londonderry upholds the highest possible standards of ethical, moral, and professional conduct. In line with this dedication and the Town's commitment to open communication, this policy provides an avenue for employees and other individuals to raise concerns and reassurance that they will be protected from reprisals or victimization for whistleblowing in good faith. However, if an employee or other individual feels that anonymity is not required then they should follow our existing reporting procedures.

### Section 2.0: Scope

This policy applies to all Town employees, board/committee/commission members and volunteers.

### Section 3.0: Definitions

The following definitions apply to this Policy:

- **Anonymous Hotline:** A contracted third-party phone line and web application to be used by employees and anyone else for the purposes of reporting fraud, waste, or abuse.
- **Reporter:** The individual who files the report of fraud, waste, abuse or ethics violation

### Section 4.0: Policy Detail

The whistleblowing policy is intended to cover serious concerns that could have a significant impact on the Town, such as actions that:

- May lead to incorrect financial reporting.
- Are unlawful.
- Are not in line with Town policies, including the Code of Ethics.
- Otherwise, it would amount to serious improper conduct.

Regular business matters that do not require anonymity should be directed to the employee's supervisor and are not addressed by this policy.

## Section 5.0: Procedures

### 5.1 Reporting

The whistleblowing procedure is intended to be used for serious and sensitive issues. Serious concerns relating to financial reporting, unethical, or illegal conduct should be reported in one of the following ways:

- **Website:** <https://report.syntrio.com/londonderrynh>
- **Anonymous Reporting App:** Keyword: londonderrynh
  - [Download detailed app instructions](#)
- **Toll-Free Telephone:**
  - **English-speaking USA and Canada: 855-893-7004**
  - Spanish-speaking USA and Canada: **800-216-1288**
  - Spanish-speaking Mexico: **800-681-5340**
  - French-speaking Canada: **855-725-0002**
  - Contact us if you need a toll-free # for North American callers speaking languages other than English, Spanish, or French
- **E-mail:** [reports@syntrio.com](mailto:reports@syntrio.com) (must include "Town of Londonderry, NH" in the report)
- **Fax:** 215-689-3885 (must include "Town of Londonderry, NH" in the report)
- **Suggestion Box:** Can be accessed from the web reporting page, or directly at: <https://report.syntrio.com/londonderrynh/sb.asp>

Employment-related concerns should continue to be reported through normal channels such as an employee's supervisor, the Human Resources Director or the Town Manager.

### Timing

The earlier a concern is expressed, the easier it is for action to be taken.

### Evidence

Although the reporter is not expected to prove the truth of an allegation, the individual submitting a report needs to demonstrate that there are sufficient grounds for concern.

### 5.2 How the Report Will Be Handled

The action taken will depend on the nature of the concern. The Town Manager receives a copy of each report and follow-up reports on actions taken by the Town. Reports filed in which the Town Manager is alleged to be involved in fraud, waste, abuse or ethics violations will be sent directly to the Town's legal counsel for review and follow-up with the Chairperson of the Town Council or the Council as a whole if there are concerns regarding the culpability of the Chairperson.

### Initial Inquiries

Initial inquiries will be made to determine whether an investigation is appropriate and the form that it should take. Some concerns may be resolved by agreed-upon action without the need for an investigation.

### Feedback to Reporter

Whether reported directly to Town personnel or through the hotline, the individual submitting a report will be given the opportunity to receive follow-up on their concern:

1. Acknowledging that the concern was received;
2. Indicating how the matter will be dealt with;
3. Giving an estimate of the time that it will take for a final response;
4. Indicating whether initial inquiries have been made; and
5. Indicating whether further investigations will follow, and if not, why not.

### **Further Information**

The amount of contact between the individual submitting a report and the official or body investigating the concern will depend on the nature of the issue, the clarity of information provided, and whether the individual remains accessible for follow-up. Further information may be sought from the reporter.

### **Outcome of an Investigation**

At the discretion of the Town and subject to legal and other constraints, the reporter may be entitled to receive information about the outcome of an investigation.

## **5.3 Safeguards**

### **Harassment or Victimization**

Harassment or victimization of individuals submitting hotline reports will not be tolerated.

### **Confidentiality**

Reporters to the hotline will have the ability to remain anonymous if they choose. Please note that the reported information may be the basis of an internal or external investigation into the issue being reported and the reporter's anonymity will be protected to the extent possible by law. However, the reporter's identity may become known during the course of an investigation because of the information provided. Reports are submitted by Syntrio to the Town or its designee and may or may not be investigated at the sole discretion of the Town.

### **Anonymous Allegations**

The policy allows reporters to remain anonymous at their option. Concerns expressed anonymously will be investigated, but consideration will be given to:

- The seriousness of the issue raised;
- The credibility of the concern; and
- The likelihood of confirming the allegation from attributable sources.

### **Malicious Allegations**

Malicious allegations may result in disciplinary action.

## Section 6.0: References

1. State of NH RSA 275-E, Whistleblowers' Protection Act [Chapter 275-E WHISTLEBLOWERS' PROTECTION ACT](#)
2. Federal 29 CFR 1977, Asbestos Hazard Emergency Response Act, 15 USC 2651
3. Federal 29 CFR 24, Safe Drinking Water Act, 47 USC 300j-9(i)
4. Federal 29 CFR 24, Federal Water Pollution Control Act, 33 USC 1367
5. Federal 29 CFR 24, Solid Waste Disposal Act, 42 USC 6971
6. Federal 29 CFR 24, Clean Air Act, 42 USC 7622
7. Federal 29 CFR 24, Comprehensive Environmental Response, Compensation and Liability Act, 42 USC 9610
8. Federal 29 CFR 1984, Affordable Care Act, 29 USC 218c]
9. Town of Londonderry Sexual Harassment Prevention and Reporting Policy

## Section 7.0: Policy & Procedure Revision History

Original Adoption Date:		
Section	Description of Revision	Date
	Original Adoption	7/25/25