

STAFF AND HUMAN RESOURCES POLICY

17.0

Policy Title: Safe Disclosure

Last Approved: February 2025

BACKGROUND

The purpose of this policy is to:

- Facilitate the safe disclosure and investigation that an employee believes may be unlawful, unethical, dangerous to others, and/or injurious to the Association's reputation;
- Manage and investigate disclosures of suspected violations;
- Protect employees who make a disclosure from reprisals; and
- Outline processes and accountabilities for employees making disclosures.

APPLICATION

This policy applies to all Association employees.

POLICY STATEMENT

It is the responsibility of all employees to report violations or suspected violations of significant and serious matters that the employee believes may be unlawful, unethical, dangerous to others, and/or injurious to the Association's reputation. This policy is intended to encourage, support and enable employees to safely disclose concerns regarding violations or suspected violations.

18.1 DEFINITIONS

Violation – Conduct by an individual working for the Association or Executive member that is:

- i. Illegal
- ii. Unethical
- iii. Dishonest
- iv. Fraudulent
- v. Financial Mismanagement
- vi. Creates an unsafe work environment
- vii. Any other conduct which may cause financial and/or reputational loss to the Association.

18.3 PROCEDURES

- i. Disclosure – Employees may disclose violations or suspected violations to their Director, Executive Director, or Employee and Labour Relations verbally or in writing.
- ii. Disclosure should state the type of violation or suspected violation, dates and times, any witnesses, and name of the employee or Executive Member suspected of the violation.
- iii. Employee disclosures will be acknowledged verbally or in writing in a timely manner.

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- iv. If an investigation is warranted, the investigating party (internal or external) will notify the employee disclosing that an investigation will be conducted which will include fact finding interviews of the employee disclosing, any witnesses, as well as with the employee alleged to have made the violation or suspected violation.
- v. All monies, property over \$5000 lost due to fraud or illegal acts will be reported to the police.

18.4 INVESTIGATION

Disclosure of violations or suspected violations will be investigated in a timely manner by an authorized neutral 3rd party (internally or externally). (See Workplace Investigation process)

18.5 CONFIDENTIALITY

- All parties part of an investigation must maintain confidentiality.
- The employee's identity who is disclosing a violation or suspected violation will be protected, to the extent possible unless in the event of a legal proceeding, the employee's identity will be made known to those who need to know.
- All employees involved (whether disclosing, acting as a witness, or has allegations against them) will keep the details and results of the investigation confidential.

18.6 Cooperation During Investigation

- All employees must co-operate fully during an investigation of suspected wrongdoing in relation to any activities outlined in this Policy.

18.7 No Retaliation

- Any employee who retaliates against an employee who discloses a violation or suspected violation will be subject to discipline up to and including termination of employment.
- Any employee disclosing a violation who believes they are the subject of retaliation should report the infraction to their Director or Executive Director or Employee and Labour Relations.
- Any allegations made in bad faith and/or maliciously and known to be false will be dealt with as a serious offense and are subject to disciplinary action.

18.8 Violation of Policy

Any employee found to have violated this policy may be subject to disciplinary action, up to and including termination of employment.

REFERENCES

HR Policy 2.0 - Code of Conduct