

HR 2.00 EMPLOYEE RELATIONS STANDARDS

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HR 2.11 Disclosure of Wrongdoings (Whistleblower Policy)			
APPROVED BY: Executive Director		DEVELOPED BY: Manager of Finance & Admin	
APPROVAL DATE:	2018	REVISION DATE:	
SUPERSEDES:	New	APPLIES TO:	Everyone

POLICY

- 1.00 Internal controls and operating procedures are intended to detect and to prevent or deter improper activities; however, at times these systems may not provide perfect safeguards against improper conduct. The Children’s Aid Society staff have a responsibility to bring to the attention of the Executive Director and/or Board of Directors instances of wrongdoing. The Society is committed to complying with the laws and regulations to which it is subject and to protecting the funds, assets and resources. It is the Policy of the Children’s Aid Society to ensure that when an employee has reasonable grounds to believe that another employee has committed or is about to commit a financial or other wrongdoing, as defined by this Policy:
 - a. The Employee may disclose this information through a clearly defined process;
 - b. The matter will be reviewed, and if warranted, investigated by the Executive Director and/or Board of Directors;
 - c. The Employee reporting information will be protected from reprisal;
 - d. The subject of the disclosure will be provided an opportunity to respond to the allegations;
 - e. All parties to the investigation will be treated fairly;
 - f. Confidentiality will be maintained to the greatest extent possible;
 - g. If wrongdoing is found, appropriate remedial and disciplinary actions will be taken

- 2.00 This Policy addresses only those matters that are in the public interest and for which there are no established reporting mechanisms in place.

- 3.00 The purpose of this policy is to ensure the highest standards of conduct and ethics of Society staff, volunteers, and Directors. As employees and representatives of the Children’s Aid Society of the District of Nipissing and Parry Sound, we must practice honesty and integrity in fulfilling our responsibilities and we must comply with all applicable policies, directives and regulations.

- 4.00 This Policy is intended to encourage and enable employees and others to raise serious concerns internally so that the Society can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, employees, foster parents and volunteers to report concerns about violations or suspected violations of law or regulations that govern the Society’s operations.

- 5.00 Staff, Board members, volunteers and community members are encouraged to report suspected fraudulent or dishonest conduct pursuant to the procedures set forth below.

PROCEDURE

Reporting Responsibility

- 6.00 For the purposes of this Policy, a complaint may be submitted if any one of the following incidents occurs:
- a. Accounting, auditing or other financial reporting fraud or misrepresentation
 - b. Violations of federal or provincial laws that could result in fines or civil damages payable by the Society, or that could otherwise significantly harm the Society's reputation or public image
 - c. Unethical business conduct in violation of any Society policies or Ministry Directives
 - d. Danger to the health, safety or well-being of employees, volunteers and/or the general public.
- 7.00 Wrongdoing does not include issues that can be handled through other established processes or existing procedures. In those cases, the allegations will be referred to the appropriate forum.
- 8.00 Employees should first discuss their concern with their immediate supervisor. If after speaking with his or her supervisor, the individual continues to have reasonable grounds to believe the concern is valid, or if the individual is uncomfortable speaking with his or her supervisor, or the Supervisor is the subject of the concern, the individual should report the concern to the Executive Director.
- 9.00 Where it is alleged that the Executive Director or a member of the Senior Management team has committed a wrongdoing, the Board President will be notified of the allegation. The information will be reported in writing to the Board President using the Disclosure of Wrongdoing Form, available of the Society's public website. The Board President will consult with other Directors of the Board on how to manage the investigation, which may include retaining a third party to conduct the investigation.
- 10.00 Anyone reporting a violation must act in good faith, and have reasonable grounds for believing that the information shared in the report indicates that a violation has occurred.
- 11.00 The Board President shall immediately notify the Audit Committee of any concerns or complaint regarding accounting practices, internal controls or auditing, and work with the committee until the matter is resolved.
- 12.00 The Disclosure of Wrongdoing Form should include the following information:
- a. Name of complainant
 - b. Description of the activity
 - c. Date complainant became aware of the activity
 - d. Name of individual suspected of the activity
 - e. Steps taken (if any) prior to making complaint or allegation (i.e. spoke with supervisor)

Confidentiality

- 13.00 The Board requires anyone reporting a violation to identify himself or herself when making a report in order to facilitate the investigation of the Violation.
- 14.00 Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Investigation

- 15.00 In keeping with the Society's policy of maintaining the highest standards of conduct and ethics, the Society will investigate complaints of suspected fraudulent or dishonest use or misuse of its resources.
- 16.00 All relevant matters, including suspected but unproven matters, will be promptly reviewed and analyzed, with documentation of the receipt, retention, investigation, and treatment of the complaint. Appropriate corrective action will be taken if necessary, and findings may be communicated to the complainant, if appropriate. Investigations may be conducted by independent persons such as auditors.
- 17.00 All reports will be promptly investigated by the Executive Director and/or Board of Directors, and appropriate corrective action will be recommended by the Board of Directors, if warranted by the investigation. All actions in receiving and investigating the report and additional information shall endeavor to protect the confidentiality of all persons entitled to protection.

No Retaliation

- 18.00 No Director, employee, or volunteer who in good faith reports suspected fraudulent or dishonest use or misuse of the Society's resources shall suffer harassment, retaliation, or adverse employment or other consequence.
- 19.00 This Policy is intended to encourage and enable employees and others to raise serious concerns within the organization prior to seeking resolution outside the organization.
- 20.00 This Policy is intended to encourage and enable Directors, volunteers, and employees to raise concerns within the Organization for investigation and appropriate action. With this goal in mind, no director, volunteer, or employee who in good faith, reports a concerns shall be subject to retaliation, or in the case of an employee, adverse employment consequences. Moreover, a volunteer or employee who retaliates against someone who has reported a concern in good faith is subject to discipline up to and including termination.
- 21.00 Improper disclosure will be viewed as Employee misconduct and will be met with appropriate disciplinary action, up to and including termination of employment for cause, where warranted.

[COMPLETE THE DISCLOSURE OF WRONGDOING FORM](#)