



<b>Policy Name</b>	(0147) Whistle Blower	<b>Original Effective Date</b>	July 2020
<b>Section</b>	Privacy	<b>Policy Effective Date</b>	July 2020
<b>Approval</b>		<b>Revision #</b>	0

### ***147.1 Purpose / Scope***

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The Purpose of this policy (the “Policy”) is to set out the duty of all Board members, volunteers, and staff to report information relating to illegal or unethical practices, violations of SHIP policies, or financial misconduct or suspected misconduct, including fraud and financial impropriety, and ensures that anyone who makes a report in good faith will be protected from retaliation.

“Services and Housing In the Province (SHIP)” is committed to ensuring the organization acts in accordance with applicable laws and observes the highest standards of business and personal ethics in conducting its responsibilities.

### ***147.2 Policy***

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Employees must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws, regulations, policies and procedures. SHIP will ensure all wrongdoings are expediently and thoroughly investigated and corrective action taken against any serious violation of policies and responsibilities.

#### **147.2.1 Duty to Report**

It is the duty of all Board members and staff to report concerns about illegal or unethical practices, and violations of SHIP policies, to the Chief Operating Officer (COO). This includes but is not limited to:

- Breach of legal obligations, rules, regulations or policy
- Endangerment of health and safety
- Gross mismanagement or omission or neglect of duty
- Abuse of authority
- Concealment of any of the above or any other breach of this policy.

Further, it is the duty of all Board members and staff to report concerns about illegal or unethical financial practices, financial misconduct or suspected misconduct, including fraud and financial impropriety to the Chief Financial Officer (CFO). This includes but is not limited to:

- Providing false or misleading information, or withholding material information on SHIP auditing information, financial statements, sales tax returns or any other financial records.
- Misappropriation or misuse of SHIP resources such as funds or assets.



- Unauthorized alteration or manipulation of financial electronic records.
- Pursuit of financial benefit or self-advantage in violation of SHIP's Conflict of Interest Policies.
- Concealment of any of the above or any other breach of this policy

If the complaint is about the Chief Executive Officer (CEO), the COO, CFO, and or the Privacy Officer will bring the complaint to the Chair of the Board for investigation.

### **147.2.2 Acting in Good Faith**

The proper investigation of a report may require that additional facts and information be obtained from the complainant to substantiate the allegations and confirm good faith. Therefore, SHIP does not accept anonymous misconduct reports.

Anyone filing a complaint alleging misconduct must act in good faith and have reasonable grounds for believing the information disclosed indicates wrongdoing. Making allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false could result in disciplinary action up to and including termination.

### **147.2.3 No Retaliation**

No Board member or staff member who makes a report in good faith shall suffer retaliation. Retaliation means any direct or indirect detrimental action threatened or taken against an individual. Anyone who is found to have retaliated against someone who has made a report in good faith will be subject to disciplinary action up to and including termination.

Without in any way restricting the meaning of the word "retaliation", the following constitute retaliation for the purposes of this policy:

- Dismissing a staff member
- Disciplining or suspending a staff member
- Imposing a penalty upon any person
- Intimidating, coercing or harassing any person

### **147.3 Procedure**

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The COO and CFO for the purpose of this policy are responsible for investigating and resolving all reported complaints and allegations under this policy and are required to report to the CEO on all complaints of misconduct and/or retaliation.

If, due to the nature of the complaint, the CEO is not the appropriate person to receive the report, the COO or the CFO will report to the Board Chair or Chair of the Finance Committee respectively.

Individuals who are not comfortable making their report to the COO or CFO may contact SHIP's Privacy Officer to report their concern.



### **147.3.1 Reporting of Misconduct**

A report of misconduct or suspected misconduct is to be made in writing or by email to the COO or CFO. All suspected misconducts will be reported to the CEO and will respond to the complainant within 5 business days to acknowledge receipt of the report of misconduct. The COO or CFO will protect the identity of the complainant and safeguard the confidentiality of any such report, and information will be shared only on a need-to-know basis.

All reports will be investigated within 20 business days unless there are extenuating circumstances. Appropriate action will be taken at the completion of the investigation. The Board of Directors will be informed of all such complaints and their disposition.

### **147.3.2 Reporting of Retaliation**

Individuals who believe that retaliatory action has been taken against them because they have reported misconduct should make a report in writing to the COO or CFO, forwarding all information and documentation to support their allegation of retaliation. Reports of retaliation will be kept confidential to the extent possible consistent with the need to conduct an adequate investigation. In cases where it may not be appropriate to bring a concern to the COO or CFO, the individual may bring their concerns forward to SHIP's Privacy Officer.

The CEO will be informed of any report of retaliation and the COO or CFO will conduct an investigation within 20 business days of receiving the report.

If the result of the investigation indicates there is a credible case of retaliation or threat of retaliation, the COO or CFO will refer the findings to the CEO and recommend measures to safeguard the interests of the complainant. The complainant will be informed of the outcome in writing. The CEO will make the final decision on the appropriate action to be taken.

If the investigation reveals no credible case of retaliation or threat of retaliation, the complainant will be advised of other mechanisms on conflict resolution.

### **147.3.3 Appeal Process**

If the complainant is not satisfied with the findings of the COO or CFO, the complainant may make a direct appeal to the CEO within 20 business days of receipt of the written report. Ruling from the CEO will constitute the final disposition of the complaint.

## **147.4 Exceptions**

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### **147.4.1 General**

Any exceptions to this policy must be reviewed and approved by the CEO and/or Executive Team.