

Whistleblower Policy Update

Priorities Committee

June 18, 2024

Whistleblower Policy

- Whistleblower Policy will replace the Public Interest Disclosure and Protection from Reprisal Policy
- Both policies outline the County's commitment to fully investigating any allegations of Wrongdoing and providing a confidential and secure process to report Wrongdoing without fear of reprisal
- Key revisions include:
 - Updated title to "Whistleblower"
 - Clarified disclosure and investigation requirements
 - Enhanced commitment to protect Whistleblowers from reprisal
 - Elevated policy language
- Guidelines will establish responsibilities and processes regarding the reporting and/or investigation of allegations of Wrongdoing under the Policy

Whistleblower reporting

- Employee are required to report any suspected Wrongdoing
- Employees are encouraged to report allegations of Wrongdoing to their supervisor, manager, director or HR
- Where an employee fears reprisal, or the nature of the allegation precludes direct reporting, a new hotline service will be implemented to allow whistleblowers to report either anonymous or confidential submissions online
 - Once a submission is completed, Whistleblowers can check back on the status of their investigation
 - County reviewers can communicate with Whistleblowers through the hotline service

Assessment

- Protected disclosures will be assessed objectively, without regard to the position, title, length of service, or relationship to any named individual
- It will be determined whether sufficient detail and merit exists to support a formal investigation
- All Protected Disclosures assessed will result in one of the following actions:
 - Investigation
 - Closure with no further action

Investigation

- Employees must participate fully in the investigation, and will be protected from reprisal
- Named individuals are granted due process
- The assigned investigator will collect as much information as possible to fully understand what happened
- Where the investigation indicates fraud or criminal intent, the matter will be referred to the RCMP
- The Whistleblower will receive general status updates as appropriate throughout the process

Outcome

- Executive Team is apprised of all Whistleblower investigations, except:
 - If allegations are against the Chief Commissioner, the Chief Financial Officer (CFO) will be apprised of the investigation
 - If allegations are against the CFO or a member of Executive Team, the Chief Commissioner will be apprised of the investigation
 - If allegations are against members of Council the Chief Commissioner will be apprised of the investigation and follow the processes outlined in Bylaw 27-2018: Council Code of Conduct
- The Chief Commissioner will inform Council of matters expected to be of public interest
- On an annual basis Human Resources will report to Council information about Protected Disclosures received and investigations conducted

Next steps

- Seek Council approval - July 2024
 - When the Whistleblower Policy is presented to Council, the GOV-002-024 Public Interest Disclosure and Protection from Retaliation Policy will be recommended for rescission
- In September 2024, the Whistleblower Policy and hotline will be communicated to staff, in conjunction with mandatory Employee Code of Conduct and Ethics training

Questions

- Priorities Committee's input and feedback on the draft Whistleblower Policy is requested today.
- Does Priorities Committee have feedback or questions?