

# Whistleblower Policy and Hotline

Council

July 16, 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. Examples may include if matters are out of scope of the policy, there is insufficient information to proceed, report was not submitted in good faith, matters are being dealt with through another process, etc.

# 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 Reprisal 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.

# Recommendation

- Council approval of GOV-002-046 Whistleblower Policy.
- Rescission of GOV-002-024 Public Interest Disclosure and Protection from Reprisal Policy.