




POLICY TITLE: WHISTLEBLOWER POLICY		POLICY SECTION: 3 HUMAN RESOURCES	POLICY NO: 3-30
ORIGINATOR OF POLICY: K. Fryday-Field	APPROVED BY: CEO	REVIEW FREQUENCY: EVER 5 YEARS	
DATE APPROVED: Dec 1, 2019	LAST DATE REVIEWED/REVISED:	CEO SIGNATURE: 	

POLICY PURPOSE

GOVERN for IMPACT is committed to integrity, ethical, and legal behaviour, and will foster and maintain an environment where contracted personnel, volunteers, and affiliates can contribute and work safely and appropriately, without fear of retaliation.

This policy has been adopted to ensure that the people of GOVERN understand that they must report any legal or ethical wrongdoing that may adversely impact GOVERN, the affiliates, volunteers, Board, contracted personnel, or the public at large, without fear of retaliation or a negative impact on their status at GOVERN. Reports of wrongdoing may be made to the immediate leader and the CEO and can if needed to submitted anonymously.

It is a violation of 's Whistleblower Policy for anyone to knowingly make a false complaint of wrongdoing or to provide false information about a complaint. Individuals who violate this Policy are subject to disciplinary and/or corrective action, up to and including termination of the relationship with GOVERN.

No Director, officer, contracted person, volunteer, or affiliate who in good faith reports a violation shall suffer harassment, retaliation or adverse consequences. A person who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of the relationship with GOVERN. This Whistleblower Policy is intended to encourage and enable people to raise serious concerns within GOVERN.

Ethical and legal violations or suspected violations should be shared with immediate leaders, i.e. someone who can address them properly. However, if this person is not comfortable speaking with his/her immediate leader or is not satisfied with the leader’s response, he/she is encouraged to speak with the GOVERN CEO. All leaders are required to report suspected violations of the Code of Conduct or the law to the CEO, who has specific and exclusive responsibility to investigate all report violations.

DEFINITIONS

Whistleblower - Any person that submits a Whistleblower complaint or report of wrongdoing.

Respondent - Someone who's alleged conduct is the subject of a complaint.

Wrongdoing- Any illegal action, violation of GOVERN policy, or unethical behaviour.

Retaliatory Acts - Retribution, or reprisal against any Whistleblower as a result of their reporting an incident of wrongdoing, or against any person that participates in an investigation relating to the allegation of wrongdoing.

This policy is intended to encourage contracted personnel, volunteers, affiliates, and others to report suspected or actual occurrence(s) of illegal or unethical events (behaviors or practices) without retribution.

1. The Whistleblower should promptly report the suspected or actual event to his/her immediate leader.
2. If the Whistleblower would be uncomfortable or otherwise reluctant to report to his/her leader, then the Whistleblower could report the event to the next highest or another level of leadership, including the CEO. The CEO should be made aware.
3. The Whistleblower can report the event with his/her identity or anonymously.
4. The Whistleblower shall receive no retaliation or retribution for a report that was provided in good faith – that was not done with malice to damage another or the organization.
5. A Whistleblower who makes a report that is not done in good faith is subject to discipline, including possible termination of the relationship with GOVERN and/or other legal means to protect the reputation of the organization, its contracted personnel, its affiliates, volunteers, and Board.
6. Anyone who retaliates against the Whistleblower (who reported an event in good faith) will be subject to discipline, including possible termination of the relationship with GOVERN.
7. Crimes against person or property, such as assault, rape, burglary, etc., should immediately be reported to local law enforcement personnel and the GOVERN CEO.
8. All whistleblower reports submitted to the CEO will be appropriately investigated in some cases using a qualified investigator who will be contracted by the CEO.
9. The Whistleblower shall receive a report within fifteen (15) business days of the initial report, regarding the status of the investigation, disposition and upon resolution of the issue.
10. If the investigation of a report, that was done in good faith and investigated by internal personnel, is not to the Whistleblower's satisfaction, then he/she has the right to take appropriate legal action.
11. The identity of the Whistleblower, if known, shall remain confidential to those persons directly involved in applying this policy, unless the issue requires investigation by law enforcement, in which case members of the organization are subject to subpoena.

12. If the Whistleblower has a report regarding the CEO, they should notify the CEO where appropriate and if that is not suitable, the Whistleblower can report the concern to the Board Chair.

13. As part of Executive Limitations Policy Monitoring process, the CEO will update the Board formally regarding Whistleblower matters. As per Board Executive Limitations Policy, if urgent reports to the Board are required, the CEO will report immediately to the Board.