

Policy no. 2018-CA-23.

Policy Governing the Disclosure of Wrongdoings

Approved:

Resolution no.

CC-180228-CA-0080

Revised:

Resolution no.

4.0 FRAME OF REFERENCE

(CQLR, c. D-11.1)

ation

(CQLR, c. A-2.1)

5.0 DEFINITION OF TERMS

- a. Discloser means an employee who makes a disclosure under this policy. This person is commonly referred to as a "whistleblower".
- b. Protected Disclosure means a disclosure that is made in good faith by an employee who has reasonable grounds to believe that another person committed a wrongdoing in accordance with this policy.
- c. Employee means any individual who is employed by the SWLSB but for greater certainty, does not include self-employed individuals or individuals working for companies or organizations doing business with the SWLSB or for suppliers of the SWLSB.
- d. Designated Officer means an individual named by the Council of Commissioners of the SWLSB to be responsible for receiving and dealing with disclosures of wrongdoings made by employees of the SWLSB. The Designated Officer shall not be a present or past member of the Council of Commissioners or an employee of the SWLSB.
- e. Improper Disclosure means a disclosure

- vii. knowingly directing or encouraging a person to commit a wrongdoing set out in any of paragraphs (i) to (vi).

If the wrongdoing pertains to corruption, malfeasance, collusion, fraud or influence peddling in awarding, obtaining or performing contracts granted while in the exercise of their functions, by a body or a person belonging to the public sector, or a gross mismanagement of contracts within the public sector, the protected disclosure shall be made to the Office of Anti-

With the authorization of the Director General or Council, the Designated Officer may obtain the assistance of resource persons or associates to deal with disclosures. No judicial proceedings may be brought against the designated officer or associates for an act performed in good faith in the performance of their duties. They shall be bound to confidentiality in the performance of their duties and must ensure that the identity of the discloser, of those who have cooperated with an audit or an investigation and of the person who is the subject of the disclosure remains confidential.

The Designated Officer shall be responsible for ensuring that this procedure is applied within the Sir Wilfrid Laurier School Board.

8.0 INVESTIGATING WRONGDOINGS

Under this policy and its related procedure, all allegations of wrongdoing will be promptly acknowledged provided the employee has self-identified. Nevertheless, action will commence as soon as possible. The Designated Officer will review the information provided and, if there are sufficient grounds for further action, draw on resources from within the SWLSB as appropriate (e.g., Audit, Legal, Finance, Human Resources, Security, etc.) to conduct an investigation.

Once the investigation is complete, the Designated Officer will provide a report of the recommendations to the Director General or in the event that the subject is the Director General, such report shall be transmitted to the Chair of the SWLSB.

If the employee who raised the concern about the wrongdoing is known, the results of the investigation will also be shared with this employee.

Approved 2018-02-28