

## **Whistleblower Policy**

---

<b>Policy #</b> 21	<b>Number of Pages:</b> 2	<b>Date of Approval:</b> June 2017
<b>Approved By:</b>	Board of Directors	<b>Review Date:</b> April 22, 2026
<b>References:</b>	Policy # 19 - Administrative Policy	

---

This policy is intended to encourage Board members, employees, Vincentians and program volunteers and others to report suspected or actual occurrence(s) of illegal, unethical or inappropriate events, behaviours or practices without retribution.

1. The Whistleblower should promptly report the suspected or actual event to their supervisor or in the case of a Vincentian, to an executive level of the Conference or Council.
2. If the Whistleblower would be uncomfortable or otherwise reluctant to report to those identified in Point 1, then the Whistleblower could report the event to another level of management, the Executive Director, an appropriate Board committee or member of the Board of Directors.
3. The Whistleblower can report the event anonymously if so desired.
4. The Whistleblower shall receive no retaliation or retribution for a report that was provided in good faith, was not done maliciously or with the intent to damage another or the Society.
5. A Whistleblower who makes a report that is not done in good faith is subject to discipline, including termination of the Board member, Vincentian, volunteer or employee relationship, or may be subject to other legal means to protect the reputation of the Society, its members and employees.
6. Anyone who retaliates against the Whistleblower who reports an event in good faith will be subject to discipline, including termination of the Board member, Vincentian, volunteer or employee relationship.

7. Crimes against person or property, such as assault, burglary, theft etc., must immediately be reported to local law enforcement personnel.
8. Supervisors, managers, the Executive Director or Board members who receive any reports that are consistent with Whistleblower efforts must promptly act to investigate and resolve the issue.
  - a) The investigation will be undertaken by a minimum of two persons who are not in a conflict of interest in consultation with the Executive Director. In the event that the Executive Director is not an appropriate choice to investigate or consult with, the Board shall direct the investigation.
9. The Whistleblower shall receive a written response within ten business days of the initial report being raised or submitted regarding the investigation, disposition or 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 the Whistleblower has the right to report the event to the appropriate legal or investigative agency.
11. The identity of the Whistleblower, if known, shall remain confidential to those persons impacted by the application of this policy; except if the issue requires investigation by law enforcement in which case the Whistleblower may be subject to subpoena.