

<b>Procedure Title</b>	Whistleblower Procedure
<b>Procedure Holder</b>	Office of the President
<b>Procedure Approver(s)</b>	Senior Team
<b>Related Policies</b>	Whistleblower Policy
<b>Related Procedures</b>	
<b>Appendices</b>	
<b>Storage Location</b>	Website - <a href="https://www.confederationcollege.ca/policies-and-procedures">https://www.confederationcollege.ca/policies-and-procedures</a>
<b>Effective Date</b>	2021
<b>Next Review Date</b>	2024

## Procedure Statements

### 1 Complaint Process

- 1.1 Where a member of the College community reasonably knows or has reason to believe that the College or a member of the College is engaged in activity covered by this Policy they may file, in confidence, a written complaint, report or disclosure with the Office of the President.
- 1.2 In event of a conflict of interest by the President, the complaint will be forwarded to the Chair of the Board of Governors.
- 1.3 The written complaint will identify:
  - 1.3.1 with recognizable detail, specific incidents, acts or decisions thought to constitute a covert wrongdoing;
  - 1.3.2 the circumstances that surround the wrongdoing, including but not limited to the relevant times and places;
  - 1.3.3 the individuals involved in the wrongdoing; and,
  - 1.3.4 the rationale for invoking the Whistle Blower Policy, including an explanation why there is thought to be no other appropriate, confidential internal policy

or mechanism available within the College community under or within which the covert wrongdoing can be raised.

- 1.4 Reports may be made anonymously, provided they contain enough detail to appropriately investigate the complaint. Reporters who identify themselves but wish to remain anonymous must clearly say so in their written report. The investigation will attempt to protect the reporter's identity to the extent possible. However, the interests of fairness may ultimately require that the reporter's identity, if known, be provided to one or more persons.
- 1.5 The Office of the President or Board Chair shall receive, determine, investigate, and resolve, where appropriate, all complaints/disclosures as defined by this Policy.
- 1.6 Reports will only be acted upon if the evidence collected in a preliminary investigation establishes that the report has merit, can be properly investigated, and should be pursued as a matter of the College's best interest.
- 1.7 This policy encourages individuals to come forward in person wherever possible. Concerns expressed anonymously are much less powerful, and will only be considered based on a number of factors including:
  - 1.7.1 the seriousness of the issues raised;
  - 1.7.2 the credibility of the concern; and
  - 1.7.3 the likelihood of confirming the allegation through credible sources and/or documentary evidence.

## **2 Review of the Complaint**

- 2.1 The Office of the President or the Board Chair shall receive the Statement and determine an appropriate course of action for investigation of the information contained in the Statement.
- 2.2 The Office of the President or Board Chair will determine the appropriate method of assessment which may include appointing an internal or external investigator to explore the allegations.
- 2.3 Where an internal investigator is appointed, the investigation will follow the non-academic investigation protocol.
- 2.4 Where an external investigator is appointed the investigation process will be set out by the investigator in advance of the process.

### 3 Assessment/Investigation Findings

- 3.1 Upon completion of the investigation, a formal report will be generated that will recommend, as necessary, resolutions of the matters raised. Recommendations will be provided to members of the administration and Board of Governors, as appropriate.
- 3.2 Where an assessment/investigation determines that in fact there is wrongdoing the Office of the President or the Board Chair will:
  - 3.2.1 address the wrongdoing using appropriate means, including but not limited to remedy of harm done;
  - 3.2.2 implementation of preventive procedures;
  - 3.2.3 correction or discipline of wrongdoers in accordance with collective agreements (if applicable); and ,
  - 3.2.4 inform the whistle blower of the generic findings and actions taken within the limitations of collective agreements and FOI/POP and/or other legal statute.
- 3.3 In the event an internal solution to a report is not available and depending on the nature of the issues raised by the report, the matter may be referred to the external auditors of the College, the Minister of Colleges and Universities, or other legal avenues, including law enforcement, for resolution.
- 3.4 Where the assessment/investigation determines that in fact there was no wrongdoing the Office of the President or the Board Chair will inform the complainant/whistle blower accordingly in writing.
- 3.5 The College will not retaliate against any employee, student or volunteer who in good faith, makes a complaint/disclosure, or raises a concern, in accordance with this Policy, or discloses information to an external agency/body, against the College or any employee of the College on the basis of a reasonable and honest belief that the information is true and in the public interest.
- 3.6 If, in investigating a complaint, the Office of the President or the Board Chair finds the complaint is made in bad faith or by knowingly providing false or materially inaccurate information, they may recommend that sanctions be imposed against the complainant.

## Revision History

Version	Change	Author	Date of Change
Original			2012-06-21
2021-11-03 – v2	Regular review	Senior Team	2021-11-03