

#### POLICY 3.2

### **HUMAN RESOURCE MANAGEMENT**

Whistle Blowing

### **POLICY STATEMENT**

While we expect everyone associated with our Organization to act with the utmost integrity, we recognize the possibility that misconduct can occur. AUGSA has a Whistle Blowing policy to outline the confidential reporting process to maintain and ensure the ongoing integrity and good governance of the Organization.

## **POLICY GUIDELINES**

## **Whistle Blowing**

- 3.02.1. All directors, officers, volunteers, employees, contractors, and consultants are encouraged to promptly report, either orally or in writing, all evidence of activity that may constitute misconduct. No person who reports a concern in good faith will be subject to retaliation or, in the case of an employee, adverse employment circumstances.
- 3.02.2. Whistleblowers are people who act in good faith to report serious offenses or \ wrongdoing occurring in an organization. Examples of serious offenses include, but are not limited to, questionable accounting practices, corporate fraud, a criminal offense, a breach of legal obligation, a miscarriage of justice, a danger to the health and safety of an individual, unresolved issues of harassment or violence in the workplace, or the deliberate covering up of information pertaining to any of the aforementioned actions. Whistleblowing is appropriate when internal communication channels or escalation would not be appropriate, have not been successful in addressing an issue or when there is a serious offense or wrongdoing where there may be a fear of reprisal or lack of confidentiality.
- 3.02.3. The confidentiality of the person raising the concern will be protected and anonymous communications will be accepted. Whistle Blower reports should be directed as follows:

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- a. Concerns with any individual aside from the Executive Director will be directed to the Executive Director.
- b. Concerns with the Executive Director will be taken directly to a member of AUGSA Council.
- 3.02.4. Those submitting a report are encouraged to provide as much specific information as possible, including names, dates, places and events that took place; the names of any other witnesses; and the Whistle Blower's perception of why the incident(s) may be a violation.
- 3.02.5. Any individual who, in good faith, reports such incidents described above will receive a written response and will be protected from threats of retaliation, harassment, discharge, or other types of discrimination including, but not limited to, respecting compensation or other terms and conditions of employment, that are directly related to the disclosure of such reports. Moreover, any person who retaliates against someone who has reported a claim in good faith may be subject to discipline up to and including termination. If any person believes they have been unfairly or unlawfully retaliated against in respect of a report made under this policy, they may file a complaint with the Executive Director or with a member of AUGSA Council.

# **Investigation and Corrective Action**

- 3.02.6. The individual who received the complaint from the Whistle Blower will either conduct the investigation and take corrective action or appoint a suitable person to do so on their behalf. An appointed person must be familiar with the investigation process and be in a position to take the necessary action.
- 3.02.7. The person conducting the investigation will:
  - a. Provide the Whistle Blower with written acknowledgement of the report within two (2) business days if the report has not been submitted anonymously. This acknowledgement will confirm that the matter will be investigated and the anticipated timeline in which they can expect to receive a response.
  - b. Make initial inquiries to determine whether an investigation is appropriate, and the form/process it should take. Some concerns may be resolved by agreed action without the need for investigation.
  - c. Thoroughly investigate all serious allegations, retaining outside legal or financial counsel or any other resource necessary to conduct a full investigation.
  - d. Take the necessary action to begin the investigation within one (1) week of the report. The length and scope of the investigation will depend on the concern, but the investigator will make every effort to conclude the investigation in a timely manner.
  - Keep all information disclosed during the course of the investigation confidential, except as necessary to conduct the investigation and take any remedial action and for reasons subject to applicable law.

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- f. Take action to resolve the concern, as necessary. This may involve initiating disciplinary action, informing external authorities, amending or changing policy, or other action as appropriate. If it is found that there is not sufficient evidence of wrongdoing, or the actions of the individual(s) are not serious enough to warrant disciplinary action, it may be more appropriate to take an informal approach to dealing with the matter.
- g. Provide the Whistle Blower with a confidential follow-up for complete closure of the concern (if possible).

## **False Disclosures**

3.02.8. AUGSA will treat all disclosures of inappropriate conduct or behaviours seriously and protect employees that raise concerns in good faith. However, appropriate disciplinary action, up to and including termination, may be taken against any person who is found to have made a disclosure maliciously that they know or ought to have known to be untrue or without reasonable grounds.

## **RELATED REFERENCES AND POLICIES**

**This Policy References** 

This Policy is Referenced by

### **POLICY RESPONSIBILITY**

**Executive Director** 

### **POLICY HISTORY**

Original Approval Date: December 6, 2023
Last Review Date: December 6, 2023
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