

CALGARY HEALTH TRUST  
**Policy**  
**Whistleblower**

## **Background**

Calgary Health Trust (the "Trust") is a registered Canadian charity that is committed to high standards of ethical, moral and legal business conduct. The Trust is further dedicated to acting in good faith with those directors, officers, committee members and employees who raise concerns regarding financial reporting, unlawful activity, or otherwise improper conduct.

## **Purpose**

The purpose of this Whistleblower Policy is to provide directors, officers, committee members and employees with an avenue for raising good faith concerns and to reassure such persons that they will be protected from reprisal, retaliation or victimization as a consequence of reporting the alleged wrongdoing.

## **Scope and Application**

This policy applies to the Trust's directors, officers, committee members and employees.

## **Policy**

The Trust intends this policy to be used for serious and sensitive issues. Examples of such issues include, but are not limited to, the following:

- Financial malpractice or impropriety or fraud;
- Failure to comply with a legal obligation;
- Criminal activity, including theft or fraud;
- Improper conduct or unethical behavior;
- Dangers to health & safety, including unsafe work practices; and
- Attempts to conceal any of the above

### Protection:

The Trust will not take or condone any adverse action (including any adverse employment consequence) against directors, officers, committee members or employees who in good faith raise a concern in accordance with this policy. Even if an allegation is not confirmed by subsequent investigation, no action will be taken against that individual. In making a disclosure the individual should exercise due care to ensure the accuracy of the information. If, however, an individual makes an allegation in bad faith or knowingly makes malicious, misleading or false disclosure appropriate disciplinary action will be taken.

The *Criminal Code* (Canada) protects individuals from adverse employment action if they disclose any type of criminal activity undertaken by their employer. The *Freedom of Information and Protection of Privacy Act* (Alberta) protects individuals from adverse employment action if they disclose any information in accordance with this Act. This policy is intended to enhance those protections and will not interfere with the Trust directors, officers, committee members or employees reporting a matter to the appropriate government or professional agency.

### Process for Raising a Concern:

*Reporting:* Concerns should be reported directly to the Chief Executive Officer. In the event that an individual's concern rises to the level that he/she reasonably believes that notice to the Chief Executive Officer will be

disregarded or otherwise not fairly considered, the individual may report violations or suspected violations to the Chair of the Trust's Finance and Audit Committee. Employment related concerns should continue to be reported through supervisors and the Human Resources department.

If disclosure to the Chief Executive Officer or the Chair of the Trust's Finance and Audit Committee is not appropriate and/or access is limited then the discloser can disclose the improper activity to an external disclosure service.

This external disclosure service can be used by members of the public to report improper activity.

The external reporting and disclosure service can be contacted at 1-866-725-0641

*Evidence:* Although a complainant is not expected to prove the truth of an allegation, he or she should be able to demonstrate that he or she has made a report in good faith.

How the Report of Concern will be handled:

*Initial Inquiries:* To the Chief Executive Officer, or to the Chair of the Finance and Audit Committee, who will make initial inquiries in consultation with legal counsel, if necessary, to determine whether or not further investigation is necessary or appropriate.

*Further Information:* The Chief Executive Officer, Chair of the Finance and Audit Committee or another officer that is not named in the allegation appointed by the Chair of the Finance and Audit Committee to investigate the complaint may seek further information from any officer, director, employee, contractor, volunteer or stakeholder of the Trust, and shall take all reasonable precautions to protect the identity of the complainant to the extent possible while doing so. The actions taken by the Trust with respect to a particular allegation will depend on the nature of the reported violation.

*Investigations:* Each case is unique but the Trust will handle any allegation reported pursuant to this Policy respectfully and with discretion. A notice of each case will be reported immediately to the Chair of the Finance and Audit Committee and a summary of such complaint will be reported at the Committee's next meeting. If the facts warrant it, the Trust will take corrective action or disciplinary action equal to the severity of the offence. In some cases, the Trust may need to report matters to law enforcement authorities. To the extent possible and appropriate, a report back to the person who first raised the concern will be made.

*Confidentiality:* The Trust will make every effort to treat the identity of a complainant or the subject of the complaint with an appropriate regard for confidentiality, with the understanding that the details may need to be shared with others in order to investigate such complaints properly. An external reporting and disclosure service can be used by the discloser to ensure anonymity.

*Anonymous Allegations:* Thorough investigation often depends on an ability to gather additional information. The Trust encourages complainants to put their names to allegations of wrongdoing. The Trust will explore anonymous allegations to the extent possible; but will weigh the prudence of continuing an investigation against the likelihood of confirming the alleged facts or circumstances from sources.

**Report to the Board**

The Trust will keep a database of complaints received and shall inform its Board at least annually of the number, type and disposition of complaints received.