



<b>NAME:</b> 06.07 WHISTLEBLOWER	<b>VERSION:</b> 1
<b>PRESENTED:</b> JUNE 6, 2015	<b>REVIEW:</b> 2019-2020

## Review Every 4 Years

### PREAMBLE

RCS has a Code of Conduct that requires employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Employees must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations and school policies and procedures. It should be emphasized that this policy is intended to assist individuals who believe they have discovered malpractice or impropriety. It is not designed to question financial or business decisions taken by the Society nor should it be used to reconsider any matters which have been investigated under the Grievance or Employee Relations policies and procedures.

### SCOPE OF APPLICATION

1. Whistleblowing is the confidential disclosure by an individual of any concern encountered in the workplace relating to a perceived wrongdoing. The school considers such wrongdoing to include, but is not necessarily limited to:
  - a. General malpractice – such as immoral, illegal or unethical conduct;
  - b. Gross misconduct;
  - c. Infractions of the RCS Professional Code of Conduct or Technology Use policy;
  - d. Potential infractions of audit (or other applicable) regulations; and
  - e. Potential infractions of the codes of conduct of all relevant professional institutions.
2. This policy applies to everyone who carries out work for RCS or The Society of Richmond Christian School, including but not limited to:
  - a. Trustees or committee members;
  - b. All employees;
  - c. Contractors and sub-contractors;
  - d. Volunteers;
  - e. Consultants; and
  - f. Work experience or other trainees.

## **DISCLOSURE AND ANONYMITY**

3. Staff is protected from victimization, harassment or disciplinary action as a result of any disclosure, where the disclosure is made in good faith and is not made maliciously or for personal gain.
4. Any disclosures will be investigated fully including interviews with the witnesses and other parties involved.
5. Anonymity: Normally individuals should make disclosures internally. The identity of the whistleblower will be protected at all stages in any internal matter. While the school can provide internal anonymity, it cannot guarantee this will be retained if external legal action flows from the disclosure.
  - a. Whilst the school encourages whistleblowers to identify him/herself, anonymous calls will nevertheless be taken seriously and investigated fully. However, the effectiveness of any whistleblowing enquiry may be limited where an individual chooses not to be identified.

## **BEST PRACTICE**

6. The whistleblower may provide their information verbally to the Superintendent or any member of the Board of Trustees. If the matter relates to the Board, the whistleblower may provide their information to the Society of Christian Schools in B.C.
  - a. The whistleblower should make it clear that they are making their disclosure within the terms of the school's Whistleblower policy. This will ensure the recipient of the disclosure realizes this and takes the necessary action to investigate the disclosure and to protect the whistleblower's identity.
  - b. Every allegation made to a Trustee must be brought to the Board.
    - i. A confidential investigation must be undertaken and overseen by 2 suitable Trustees.
    - ii. If the allegation is found to be criminal in nature SCSBC must be contacted for advice or legal counsel must be engaged to assist with a determination of how the Board should proceed.
  - c. Additional support from SCSBC may be called upon at any time by the Board, to assist with the investigation. The procedure found in 1.5 Dispute Resolution policy should be referenced.
  - d. A confidential written record of the steps taken will be kept by the two Trustees and made available to the Board.

7. Supporting evidence for the allegations, if available, is clearly helpful. It is not required before reporting the matter. However the individual must reasonably believe the information is substantially true.
8. The whistleblower will be kept informed of the progress and the outcome of the investigation, within the constraints of maintaining confidentiality or observing legal restrictions generally.
9. There will be no adverse consequences for anyone who reports a whistleblowing concern in good faith. However, any individual found responsible for making allegations maliciously or in bad faith may be subject to disciplinary action.

#### **CAVEAT**

Whistleblower legislation has been proposed in BC but did not pass, further discussion is on-going and legislation should be consulted if it were to pass.