

ST. LEONARD'S COMMUNITY SERVICES LONDON & REGION
POLICY AND PROCEDURE MANUAL

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	Original Approval Date September 24, 2019	Last Review Date January 8, 2024
	Approved By SLCS Executive Director	Last Revision Date January 8, 2024

PREAMBLE

St. Leonard's Community Services (SLCS) is committed to a working environment of high ethical standards and accountability. Internal controls and operating policies and procedures are intended to prevent, deter, detect, identify and address unethical activities. However, at times these controls and procedures are not sufficient safeguards. A whistleblower policy provides another safeguarding mechanism and provides all stakeholders with a process for reporting questionable conduct.

POLICY

SLCS encourages individuals to come forward with information on illegal practices, professional misconduct/incompetence, violations of organizational policies, and unethical behaviour. The agency will not retaliate against, nor will it abide by any individual in the organization retaliating against individuals that make good-faith reports. Confidentiality of those making reports is of utmost concern to SLCS, and as such, will be protected to the greatest extent possible (except where required by law).

PROCEDURE

1. SLCS is responsible for fully investigating all whistleblower reports. To fulfill this mandate, SLCS' Board of Directors has designated the Executive Director to act as Compliance Officer in receiving and investigating reports. The exception to this is if the report includes the Executive Director in allegations, the Board Chair will receive and direct the investigation of the report.
2. It is the responsibility of everyone in the organization to comply with legislation, organizational policy/procedure, and conduct themselves ethically in fulfillment of their duties. It is also the responsibility of everyone in the organization to report concerns that arise including:
 - unlawful acts, whether civil or criminal;
 - theft, embezzlement, bribery or fraud;
 - dangerous practices likely to cause harm or damage to any person, property or the environment;
 - unprofessional conduct or business/professional practices;
 - conflicts of interest;
 - violations of policy or procedure or any regulations that govern SLCS' operations;
 - failure to comply with, or efforts to circumvent SLCS' internal compliance policies or controls.
3. Prior to initiating a whistleblower report, individuals should refer to and consider using

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Policy 2.08 Complaint Process, Policy 4.24 Employee Complaints, and Policy 7.21 Feedback Process for program participants. The Complaint and Whistleblower policies and processes are not to be used for emergency situations. Such complaints shall follow policies regarding Serious Occurrences and Abuse Prevention and Reporting. If none of the aforementioned policies are deemed appropriate by the individual, or if the individual is unable to navigate those processes, then the Whistleblower policy and process should be used.

4. The email whistleblower@slcs.ca is to be used to provide a written whistleblower report, or to request a meeting to provide an in-person report. Emails to this address are auto-forwarded to the Executive Administrator, who then forwards the message to the Executive Director (or Board Chair if the report involves the Executive Director). The subject heading of the email should be "CONFIDENTIAL".
5. The Executive Administrator will receive training on this role including understanding the policy and procedure and the confidentiality required when navigating whistleblower reports.
6. Any individual filing a report should be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Policy (see list of violations in item 2 above). Any reports that ultimately prove to be unsubstantiated, and to have been made maliciously or knowingly to be false, will be viewed as a serious disciplinary offense, and may be referred to legal authorities if it is deemed that it may constitute a criminal offence.
7. If contact information is provided with the report, the Compliance Officer (or Board Chair) will acknowledge receipt of the report within 10 business days.
8. The Compliance Officer (or Board Chair) is responsible for investigating and resolving all reported complaints and advising the Board of Directors (in a time and fashion defined in Policy 1.09 Risk Management) of the report and investigation.
9. The subject of the report will be provided an opportunity to respond to the allegations. All parties to an investigation will be treated fairly and with unbiased process that complies with the demands of natural justice.
10. No person who in good faith files a complaint shall suffer any reprisals, retaliation or adverse consequences as a result of doing so. Any individual who retaliates against someone who has reported a suspected violation in good faith is subject to discipline, up to and including dismissal.

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11. Confidentiality will be maintained to the greatest extent possible. The limits of confidentiality, and potential consequences (i.e. ability to investigate and address concern while maintaining confidentiality may be an issue depending on circumstances) will be discussed with anyone making a report before an investigation is initiated. All persons will:

- keep information relating to any process under this Policy strictly confidential,
- refrain from discussing any reports or fact of their involvement, except to the extent required for the purposes of investigation and resolution.

12. This policy will be available on the SLCS website (www.slcs.ca).

References: Policy 2.08 Complaint Process, 4.24 Employee Complaints, 7.21 Feedback Process for Program Participants, 5.03 Serious Occurrences, 7.07 Abuse Prevention and Reporting, 1.09 Risk Management, Risk Management Framework (AD 107)