



## Whistleblower

<b>Procedure No.:</b> ADM-6	<b>Council Resolution No.:</b> N/A
<b>Department:</b> Administration	<b>Authority:</b> CAO
<b>Effective Date:</b> 25/05/15	<b>Revision Date:</b>
<b>Review Date:</b> April 2022	<b>Repealed Date:</b>
<b>Supersedes:</b> N/A	
<b>Related Policy No.:</b> ADM-6	
<b>Related Policy Name:</b> Whistleblower	

### Purpose

This procedure provides guidance for persons who intend to submit a report under the Whistleblower Policy, as well as instruction regarding the process for dealing with those reports.

### Operating Guidelines

Pursuant to the Town's Whistleblower Policy, wrongdoings may include but shall not be limited to:

- a. crime or suspected criminal activity;
- b. any actual or suspected violation of any federal, provincial or municipal act, regulation or bylaw;
- c. any actual or suspected violation of any Town policies and procedures;
- d. the misuse of position for personal gain;
- e. any claim for reimbursement of expenses that are not made for the exclusive benefit of the Town;
- f. unauthorized use of Town property, equipment, materials or records;
- g. any misappropriation of funds, securities, supplies or other assets;
- h. dangerous practices likely to cause physical harm or damage to any person or property;
- i. failure to rectify or take reasonable steps to report a matter likely to give rise to a significant and avoidable cost or loss to the Town; or
- j. improper or fraudulent accounting or auditing practices.



- 1) Anyone with a complaint or concern of a wrongdoing by an employee shall contact MNPs Ethics Alert Hotline (1-866-529-9589). MNP LLP will assess the information and advise the Administrative Services Manager of the potential threat and suggested responses. Assuming that an investigation is warranted, the Administrative Services Manager shall follow the process outlined below.
- 2) In the event that the Administrative Services Manager is the subject of the complaint, MNP shall assess the information and advise the Chief Administrative Officer (CAO) of the potential threat and suggested responses instead of the Administrative Services Manager.
- 3) In the event that a Council member or a Council committee member is the subject of the complaint, the employee or public complainant shall contact MNP's Ethics Alert Hotline (1-866-529-9589), which shall advise the CAO.
- 4) The Town encourages both employees and public complainants to report their concern in writing so as to assure a clear understanding of the issues raised, but the report can also be made by telephone or by email. Reports should be factual in nature and contain as much specific information as possible to allow for proper assessment and investigation of the allegations reported. If the concerns are forwarded in writing, they should be forwarded in a sealed envelope and labeled, "Confidential". Reports of wrongdoings should include the contact information for the complainant or a statement that anonymity is requested.
- 5) The employee or public complainant should:
  - a. report any wrongdoing of which he/she may have knowledge;
  - b. report any wrongdoing as soon as possible after becoming aware of the wrongdoing; and
  - c. treat any such report of wrongdoing in a confidential manner.
- 6) The Administrative Services Manager shall:
  - a. review the report of wrongdoing;
  - b. conduct an investigation, or appoint an investigator (including MNP LLP) to conduct an investigation, into the complaint/report of wrongdoing;
  - c. take no action where the report of wrongdoing is trivial or vexatious;
  - d. follow the Employee Code of Conduct Policy and Procedure where an employee has knowingly made a false or bad faith complaint or has knowingly made a false or misleading statement during an investigation;
  - e. keep the complainant up to date as to the progress of the investigation if the complainant has provided contact information or provide the complainant with a follow-up to their concerns; and
  - f. provide the Chief Administrative Officer (CAO) with the results for review of the investigation that was conducted.
- 7) If a suspicion of wrongdoing on the part of a Town employee is substantiated by



investigation, the employee will be subject to disciplinary action, up to and including dismissal. The final and binding decision in regard to the investigation and disciplinary action will lie with the Chief Administrative Officer (CAO).

- 8) In the event that MNP LLP undertakes the investigation, the MNP investigator shall report the findings of the investigation to the CAO; except that if the CAO is the subject of the complaint, the MNP investigator shall report directly to Town Council in a Closed Session meeting of Council.
- 9) If a suspicion of wrongdoing on the part of a Town Councilor or Council committee member is substantiated by investigation, the CAO shall report the issue to Council in a Closed Session meeting of Council. Depending on the issue, the CAO may also contact Alberta Municipal Affairs.



CHIEF ADMINISTRATIVE OFFICER

May 8, 2019

DATE

