



# PROCEDURE

# F107

## Reporting of Wrongdoing

**Board Received:** November 22, 2021

**Review Date:** January 2026

### The Report

1. Unless as otherwise provided herein Reports of reasonable knowledge or reasonable suspicion of wrongdoing will be made promptly to the Director or person designated by the Director to receive and act on such Reports. The Director may designate a Senior Board Official or an external Third Party for this purpose. Reports of sexual misconduct may be made orally or in writing to **Superintendent of Human Resources**.

### Content and Anonymous Report

2. The Report will be sent in writing or in electronic form and will contain the information set out in schedule "A" herein;
3. Reports of sexual misconduct may be made orally or in writing to the person designated in section 1 above.
4. The Director or designate may decline to investigate an anonymous Report.
5. The Report and the identity of the Reporting Party will not be disclosed unless required by law;

### Assessment by Director

6. Upon receipt of the Report the Director or designate will assess it to determine:
  - a) Whether it is made in good faith, is frivolous, vexatious and satisfies the definition of Wrongdoing;
  - b) Whether another legal authority should receive and investigate the Report. For example, Reports of suspected criminal activity should be reported immediately to the Police;
  - c) Whether the Report is already the subject of a legal proceeding or should be processed by another appropriate statutory authority;
  - d) Whether the matter involves employment or labour relations matters and can be addressed by other means;
  - e) In all of the circumstances, whether the matter should be addressed by other means;
7. Where the Director or designate confirms any of the factors set out in section 6 exists no investigation of the Report should be undertaken and the Reporting Party will be informed accordingly.

### Investigation

8. Where the Director or designate decides an investigation of the reported Wrongdoing is warranted it will be carried out without delay adhering to principles of fairness and in accordance with relevant Board Policies and Procedures; Whenever appropriate the Investigation should be conducted by an independent third party;
9. As part of the investigation the alleged wrongdoer will be provided with the substance of the Wrongdoing allegations and given a reasonable opportunity to respond.
10. All documentation of any kind generated by an investigation or any other action taken under this Procedure is confidential and will be securely retained by appropriate Board officials;
11. Where the Report alleges Wrongdoing on the Part of the Director, it will immediately be referred to the Chair who then will immediately refer to an independent third party for processing under this Procedure. The Report of any investigation under this part will be made to the Chair of the Board who will thereafter report to the Board of Trustees

**Receipt of Investigative Report**

12. Upon receipt of the report of the investigation under section 8 above, the Director or designate will determine whether any disciplinary action is warranted, any law enforcement or professional authorities should be notified, to what extent the Reporting Party can be informed of the results of the investigation and whether any other action should be taken;

**Obstruction**

13. Anyone who intentionally interferes with or obstructs any investigation undertaken under this Procedure will be subject to appropriate discipline and/or other available legal sanctions;

**Reprisal**

14. Any person who commits or attempts to commit any act of reprisal as defined by Policy F7 will be subject to appropriate discipline and/or available legal sanctions;

**Report to Board**

15. The Director or Chair of the Board, as the case may be, will Report to the Board annually on all investigations of Reports of Wrongdoings.

**Reference:**

Policy F7 Reporting of Wrongdoing

**Resources:**

HR119 – Employee Discipline

HR5 – Harassment and Objectionable Behaviour

**CONTENT REQUIREMENTS OF REPORT OF SUSPECTED WRONGDOING**

1. Full name, address and contact information of Reporting Party;
2. Relationship to Board (employee, independent contractor other);
3. Name, contact information (if available);
4. Description of the Wrongdoing;
5. Duration of Wrongdoing if known;
6. Persons affected by the Wrongdoing;
7. How did the Wrongdoing come to your attention;
8. Any additional information you consider relevant;
9. Attach a copy of any documentation you consider relevant. Any information in electronic form should also be included.