



Whistleblower Investigation Procedures

For a definition of what is meant by whistleblower incidents, a complaint form, and detailed information on how whistleblower complaints to GaLTT will be investigated, please see GaLTT Operating Policies section 2.7, and supporting documents (<https://galtt.ca/governance/#policies>).

Reporting

Complaints must be submitted in writing.

Officers, directors, volunteers, and contractors should report whistleblower incidents to the Executive Director (if applicable) or to the Board president. If the person making the report is not comfortable reporting to either of these individuals or if he/she does not believe the issue is being addressed appropriately, the individual may report directly to any member of the Executive Committee.

GaLTT employees should report whistleblower incidents directly to their supervisor. Employees who are uncomfortable communicating with their supervisor or who do not believe the concern is being addressed appropriately, may report the issue to the next higher level of management above the immediate supervisor or, if the employee prefers, to any member of the Executive Committee.

Whistleblowers who wish to remain anonymous should download and complete the form and then send it by mail to any member of the Executive Committee, by name, via GaLTT's general mailing address.

How and when investigations will be conducted

Unless the complaint is submitted anonymously, the person receiving the complaint shall promptly acknowledge receipt of the complaint to the Whistleblower. The person receiving the initial report shall forward it to the Executive Committee within five business days.

The Executive Committee shall meet to discuss the report as soon as possible and decide how to conduct an investigation. Any appropriate action and investigation will be initiated at this time. If deemed appropriate, the Executive Committee shall seek legal advice.

In the event that a report concerns a member of the Executive Committee, the committee deliberations shall proceed confidentially without that member being present. Any member of the Executive Committee with a conflict of interest in the matter must recuse themselves and maintain full confidentiality about the matter. In either of these situations, the Executive Committee may choose to draw on the assistance of other Board members in discussions and investigations relating to the matter.

Investigations will:

- be undertaken by the Executive Committee within 10 business days of the receipt of the report
- be as thorough as necessary, given the circumstances

- treat all parties to a complaint fairly and impartially
- maintain confidential to the greatest extent possible. (An individual's identity may have to be disclosed to conduct a thorough investigation, to comply with the law, or to provide accused individuals their legal rights of defense. Unauthorized disclosure of information relating to an investigation under this policy to individuals not involved in the investigation will be viewed as a serious disciplinary offense and may result in discipline, up to and including dismissal from the organization.
- be focused on finding facts and evidence, including interviews of the complainant (if not anonymous), witnesses, and respondent
- recommend disciplinary and/or remedial action as appropriate
- protect persons who are witnesses or otherwise involved in good faith in a complaint from retaliation and discrimination, even if it is proved that no unlawful activity has occurred

Roles and responsibilities

Unless required by law to immediately report a violation, a formal investigation of a complaint will be directed by the Executive Committee (excluding any members of the executive who are included in the complaint). The Executive Committee is responsible for ensuring designated investigation procedures are followed and will designate a member as point of contact for the investigation.

The Executive Committee shall decide how to conduct an investigation to determine whether the allegations are true, whether the issue is significant, and what actions, if any, are necessary to address and correct the issue. If deemed appropriate, the Executive Committee shall seek legal advice.

Follow-up

A written report of the investigation, including recommended actions, will be issued to the Board of Directors, which may conduct further investigation upon receiving the report.

If a Whistleblower name and contact information is provided in the initial complaint, the results of the investigation will be shared with the Whistleblower to the extent possible. However, all details of the investigation, and actions taken, may not be divulged to the Whistleblower due to confidentiality and legal requirements.

Any officer, director, employee, volunteer, or contractor who retaliates against a person who has reported a concern in good faith is subject to discipline, up to and including dismissal from the organization.

However, the act of making allegations maliciously, recklessly, with gross negligence, or with the foreknowledge that the allegations are false or unsubstantiated, will be viewed as a serious offense and may result in discipline, up to and including dismissal from the organization. GaLTT will not protect a Whistleblower who intentionally makes false accusations in reporting of a whistleblower incident.

Corrective action for the person found to have engaged in a whistleblower incident may include: a reprimand; prohibition from participating in a GaLTT activity or committee; termination of employment; or dismissal from the organization.

The Executive Committee will review the details of the complaint to determine if revisions to policies and procedures could help to prevent future incidents and make recommendations for changes if appropriate. Appropriate corrective actions will be taken within a reasonable time frame.

Record-keeping

All records of an active complaint and investigation including notes, documents, photographs, and other evidence will be kept securely. These records will be considered confidential and access will be given only to members of the investigating committee.

If a complaint is found to be substantiated, written records of the investigation will be retained. Such records may be opened by the complainant or requested by courts.

If a complaint is found to be false or unsubstantiated, all records of it will be destroyed.

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