POLICY GBO – Public Interest Disclosure Exhibit 1 – Procedures for Employees to Report Wrongdoing Page 1 of 3

Reportable types of wrongdoing

- 1. The Act facilitates the disclosure and investigation of "wrongdoing". The Act specifically defines the types of wrongdoing that may be reported and investigated:
 - a.) a contravention of an Act, a regulation made pursuant to an Act, an Act of the Parliament of Canada or a regulation made pursuant to an Act of the Parliament of Canada.
 - b.) an act or omission that creates
 - i.) a substantial and specific danger to the life, health, or safety of individuals other than a danger that is inherent in the performance of the duties or functions of an employee, or
 - ii.) a substantial and specific danger to the environment.
 - c.) gross mismanagement, including an act or omission that is deliberate and that shows a reckless or willful disregard for the proper management of
 - i.) public funds or a public asset;
 - ii.) the delivery of a public service, including the management or performance of
 - A. a contract or arrangement identified or described in the regulations, including the duties resulting from the contract or arrangement or any funds administered or provided under the contract or arrangement¹, and
 - B. the duties and powers resulting from an enactment identified or described in the regulations or any funds administered or provided as a result of the enactment,

or

- iii.) employees, by a pattern of behavior or conduct of a systemic nature that indicates a problem in the culture of the organization relating to bullying, harassment or intimidation.
- d.) knowingly directing or counselling an individual to commit a wrongdoing mentioned above.
- 2. This procedure does not apply to alleged contraventions of internal policies or directives, code of conduct matters, violations of collective agreements, or individual disputes been management and an employee relating to bullying, harassment or intimidation.

Seeking advice

1. Employees considering making a disclosure may seek advice from their supervisor, their designated officer, or from the Public Interest Commissioner. Employees are protected from any adverse employment action as a result of seeking advice.

¹ No contracts or arrangements have been identified or described in the regulations as of the date of this policy.

- 2. In circumstances where a complaint relates to the designated officer or chief officer, employees are encouraged to seek advice from the Public Interest Commissioner.
- 3. The office of the Public Interest Commissioner may be contacted at:

Email: <u>info@pic.alberta.ca</u> Phone: 1.855.641.8659 www.yourvoiceprotected.ca

Reporting wrongdoing

- Employees may seek advice or make a disclosure to the designated officer or to the Public Interest Commissioner in the first instance of perceived wrongdoing despite any other policy, procedure or code of conduct requiring an employee to take any other preliminary step to address their concern.
- 2. Employees who want to report wrongdoing may do so by contacting the designated officer. Employees should clearly indicate they are making a disclosure under the Act. The designated officer for PWPSD is the District Principal and may be contacted at: (780) 532-8133.
- 3. Employees must submit any complaint of wrongdoing in writing and may be asked to report the wrongdoing to the designated officer using the prescribed <u>Disclosure of Wrongdoing</u> form in Exhibit 3.
- 4. Employees who want to report wrongdoing to the Public Interest Commissioner may do so by submitting the online complaint form on the Public Interest Commissioner's website. Employees may find the form here.
- 5. Employees who submit a disclosure of wrongdoing to the designated officer may also inform the Public Interest Commissioner of the disclosure. The Public Interest Commissioner will consult with the designated officer and monitor the outcome of the matter

Anonymous disclosures

Employees considering making a disclosure anonymously should seek advice about doing so from the designated officer or the Public Interest Commissioner. Anonymous disclosures may not be acted on if there are inadequate particulars provided about the alleged wrongdoing and would therefore not permit the conduct of a fair and effective investigation.

Disclosures relating to the chief officer or designated officer

Employees who have information about wrongdoing involving the chief officer or designated officer shall make a disclosure of wrongdoing to the Public Interest Commissioner.

Reporting reprisals

- 1. The Act protects from reprisal any employee who has, in good faith:
 - a.) requested advice about making a disclosure from a supervisor, the designated officer, or the Public Interest Commissioner;
 - b.) made a disclosure under the Act;
 - c.) cooperated in an investigation under the Act;
 - d.) declined to participate in a wrongdoing; or
 - e.) done anything in accordance with the Act.
- 2. A **reprisal** is defined as taking, directing or counseling someone to take or direct:
 - a.) a dismissal, layoff, suspension, demotion or transfer, discontinuation of a job, change of job location, reduction in wages, change in hours of work or reprimand;
 - b.) any measure, other than those mentioned above, that adversely affects the employee's employment or working conditions; or
 - c.) a threat to take any of the measures above.
- 3. PWPSD supports employees who come forward in good faith to report wrongdoing. Reprisals taken against employees will not be tolerated. A reprisal is an offence under the Act. Anyone who takes, directs or counsels a reprisal against an employee is liable to prosecution under the Act in addition to disciplinary action, including termination of employment, by PWPSD.
- 4. Employees who believe they have been the target of a reprisal may make a complaint of reprisal directly to the Public Interest Commissioner using the form on the Public Interest Commissioner's website. The Complaint of Reprisal Form may be found here.