

	POLICY	
	HR-102 Safe Reporting	
	Original Date	Revision Date
	January 30, 2008	December 1, 2020

Policy

RCMSAR expects all members to report real or suspected wrongdoing to a person in authority or, if appropriate the Manager of Human Resources.

Reason for Policy

The purpose of this policy is to establish a process that allows individuals to bring forward information, in good faith, concerning allegations of wrongdoing, without fear of reprisal or retaliation.

Guidelines

Scope: this policy applies to all individuals associated with RCMSAR collectively defined as persons. Persons includes:

- members as defined in under definitions in HR100
- providers of goods and services to RCMSAR
- donors and other supporters
- partners such as CCG, and other regions of CCGA

Definition(s):

Safe Reporting: Reporting of alleged/perceived wrongdoing that has occurred or is occurring in the organization

Wrongdoing: Behaviour that can encompass wrongdoing can include acts that are unlawful, unethical, corrupt or a danger to health and safety. They can encompass misuse of organizational funds or resources, a lack of compliance with RCMSAR policies, procedures, financial controls, and contractual obligations or reflect a real or perceived conflict of interest.

Good Faith: All reports under this policy must be made in good faith and based on reasonable grounds. they must not be intentionally false, misleading, or malicious.

False or Malicious Allegations: Where it is determined that a person's report was made in bad faith or with malicious intent, action will be taken including disciplinary action up to and including termination of services.

Safe Reporting Protection: RCMSAR will not allow any direct or indirect harassment, retaliation, or reprisal against a person who in good faith reports a wrongdoing.

Procedure

A person alleging a wrongdoing may file a written and confidential report with a member of the management team or directly to the CEO.

Upon receipt of a report, the merits of the allegation will be assessed and discussed with the person making the report by the person to whom the report was filed with. The CEO will be made aware of all such allegations by the management person receiving the report.

The merit assessment may give rise to any or all of actions listed:

- no further action being taken
- a need for the revision of existing standards, practices, or controls
- counselling or training for those accused
- a formal investigation

Should a formal investigation be required the following will occur.

- it will be confidential and conducted utilizing Terms of Reference signed by the CEO
- it will be assigned to the Manager, Human Resources, or an external resource
- an external resource required to investigate, or assist may only be assigned by the CEO.
- it will be completed within 45 days unless an extension is granted by the convening authority
- a report of the findings resulting from the investigation will be prepared and provided to the CEO for a final decision on actions to be taken

If the matter involves the CEO, or a member of the Board, then the steps listed above taken shall be under the authority of the Board Chair.

Where the investigation substantiates the allegations of culpable conduct or wrongdoing corrective action will be taken as promptly as possible. The specific action taken in any case will depend on the nature and gravity of the matter. Where appropriate, the person(s) responsible could be disciplined, up to and including the termination of their services, or the termination of the person's relationship with RCMSAR.

Following an investigation, the person who reported the wrongdoing will be advised whether their allegation was supported. They will not be advised however of the nature or quantum of corrective measure taken.

The CEO or if required, the Board Chair, will determine if the facts as established by the investigation will be made known to any outside agency including known to the appropriate law enforcement agency and whether legal proceedings will be commenced against the perpetrator.