

SAFE DISCLOSURE POLICY POLICY NAME	GOV11-03 POLICY NUMBER
ACHF FINANCE & AUDIT COMMITTEE POLICY SPONSOR	ACHF BOARD OF DIRECTORS APPROVING AUTHORITY
May 26, 2011 ORIGINAL APPROVAL DATE	JUN 1, 2011 ENACTMENT DATE
NOVEMBER 17, 2016 LAST REVIEW/CIRCULATION DATE	NOVEMBER 17, 2017 NEXT REVIEW DATE

PURPOSE

In all its activities, the Alberta Children’s Hospital Foundation (“Foundation”) seeks to promote a culture based on honest, transparent and accountable behavior. Its employees and volunteers (collectively, “Personnel”) have an important role to play in achieving this goal. While it is the expectation that Personnel will conduct themselves according to the highest ethical standards, the Foundation recognizes that the good faith reporting of instances where Personnel are engaging in improper or illegal activities (“Improper Activities”) is a necessary and valuable service to all its stakeholders, is consistent with our duty of loyalty and commitment to the Foundation, and must not be cause for reprisals. This policy is to be used when you are aware of Improper Activity and believe that that voicing your concerns will not address the issue properly, or you fear dismissal, harassment or other retaliation.

PROCESS

When you have a matter you wish to report, you (the “Discloser”) should either call 1-866-921-6714 (IntegrityCounts, third-party service engaged by the Foundation) or submit an email or other written correspondence that outlines as clearly as possible information regarding the activity thought to be improper - including dates, if known, the person(s) involved and any other information that would be useful in an investigation of the allegation(s). The Service will submit a copy of the report to the President & CEO and a summary of the incident will go to the Chair of the Audit Committee of the Board of Directors.

The person who investigates the allegation is known as the “Responsible Officer”, who typically is the appropriate Vice President of the area in which the Improper Activity is alleged to have taken place. In cases where the person that might investigate the complaint is one of the accused (“Respondent”), it will be investigated by another Vice President or the President & CEO. In no case will the person against whom the complaint is made be the person carrying out the investigation. In cases where the President & CEO is the Respondent, the detailed report will be provided to the Chair of the Audit Committee, who will then be responsible for the investigation.

WHAT HAPPENS AFTER IT HAS BEEN ASSIGNED TO A RESPONSIBLE OFFICER

After reviewing the allegation(s), the Responsible Officer shall decide within fifteen (15) working days whether further action is warranted. There are three possible conclusions that can result from the review.

- She/he may decide that no further action is warranted and, if so, will notify the President & CEO with reasons in writing. The President & CEO will then notify you.
- She/he may decide that further action is warranted and in such case shall either point you, through the President & CEO, to an existing internal process that can resolve it, or appoint an outside investigator (“Investigator”) to carry out the review. The Investigator shall have the

freedom to carry out the investigation as she/he sees fit and will receive the support necessary from the Foundation and its staff to carry it out. The Investigator shall file a report as soon as possible, but no later than 30 days after the start of the investigation. In unusual cases, the Investigator may apply for an extension of up to 30 days.

- The third finding could be that the report is malicious and not made in good faith. In such cases, an investigator shall be appointed to carry out a review.

PRIVACY

Every effort will be made to protect your privacy. In the first instance, the Responsible Officer will not be given information that would identify the Discloser. That information will be provided only if it is necessary in order for the investigation to be carried out. Likewise the Respondent(s) have the right to privacy as well and their identity will not be disclosed unless it is necessary in order to carry out the investigation.

Except as required by law, the Investigator's report shall not be disclosed or discussed with any persons other than the President & CEO, the Responsible Officer, the Respondent, and such other person(s), including the Discloser, who may have a legitimate need to know of the results of the investigation in order to perform their duties. Final determination of such persons shall be made by the President & CEO, and should the President & CEO be the Respondent, then by the Chair of the Audit Committee.

SAFETY FROM RETALIATION

All reasonable steps consistent with the law and the rights of the Respondent shall be taken by the Responsible Officer, Investigator or other officer or body charged with investigating a report of Improper Activity, to protect the position, reputation, privacy and confidentiality of the Discloser who has made a Good Faith Report of Improper Activity.

No Discloser who makes a Good Faith Report shall be subject to retaliation, regardless of the results of any investigation and/or the decision of the Responsible Officer.

An innocent Respondent or a Respondent who commits an Innocent Violation shall not be subject to retaliation or discipline.

REPORTS THAT ARE NOT GOOD FAITH REPORTS

A Discloser who makes a report that is not a Good Faith Report commits a disciplinary offence. Where a Responsible Officer, on his or her preliminary review of the allegations, has reasonable grounds for suspecting that a report is not a Good Faith Report, the Responsible Officer shall conduct an investigation into the matter with such assistance as they deem necessary, and may, where appropriate, institute disciplinary proceedings against the Discloser in accordance with the relevant regulations and policies of the Foundation. The Responsible Officer is not required to hold a hearing.

ANNUAL REPORT OF IMPROPER ACTIVITIES

Once per year, the President & CEO shall make a report to the Foundation Board of Directors that includes: (i) the number of reports filed by Disclosers; (ii) the number of reports investigated; (iii) the findings of investigations conducted pursuant to a report; (iv) any action taken pursuant to an investigation.

