



## **WHISTLEBLOWER POLICY**

### **1. Introduction**

A whistleblower is a party who, in good faith, conveys or is proven to be about to convey a concern, an allegation or any information indicating that a prohibited practice is occurring or has occurred within the operations of Canadian Physicians for Aid and Relief (CPAR) or in a CPAR-funded project.

Whistleblowers can include, but are not limited to:

- Staff, including anyone who is on the payroll of CPAR, whether he/she is on permanent, contract, temporary, part-time or other types of employment
- External parties including donors and volunteers of CPAR
- Individuals or organizations with business dealings with the organization or
- Grantees.

### **2. Objective**

CPAR's Whistleblower Policy provides direction to all current and former Board members, staff, formal volunteers, suppliers, donors, partners and community members regarding the communication of concerns about questionable or illegal practices or activities or suspected questionable or illegal practices or activities concerning CPAR.

CPAR expects anyone who has serious concerns about any aspect of the operations, programs and services of CPAR to come forward. This Policy provides a confidential procedure through which such concerns can be reported and investigated.

### **3. Policy**

CPAR is committed to the highest standards of honesty, transparency, ethical and legal conduct and accountability. In line with this commitment, we provide this avenue for parties to raise concerns regarding wrongdoings, that may include, although are not limited to:

- Fraudulent activities/transactions
- Personal and profession misconduct
- Unauthorized access to and/or disclosure of information
- Embezzlement, misappropriation, theft, or criminal misuse of the organization's monies and resources
- Corruption, bribery, cheating
- Threats to person or property
- Aiding and abetting violations of national, provincial, regional, regional state, district or local laws or
- Acceptance and use of funds for purposes not intended for those funds, and other fraudulent financial reporting.

The whistleblower is not responsible for investigating the activity or for determining fault or corrective measures; appropriate management officials are charged with these responsibilities.

This Policy does not cover individual employee complaints or concerns, issues or grievances relating to their employment such as the employee's compensation, job duties, performance evaluation or supervision. Nor does this Policy cover such issues as harassment, discrimination or accessibility as these matters are covered in other CPAR policies. Please refer to CPAR employment related policies and documents and CPAR organizational policies for these matters.

#### **4. Implementation**

Whistleblowing enables a party to raise serious and genuine concerns. If an employee has knowledge of or a concern about illegal or dishonest fraudulent activity, the employee is to contact his/her immediate supervisor, or Human Resources, a role that is currently held by the Director of Finance in Canada. If the Whistleblower is uncomfortable or otherwise reluctant to report to their supervisor, or is a volunteer or other party to CPAR, then the Whistleblower may report the event to the next highest or another level of management, whether the Executive Director through a special e-mail address ([confidential@cpar.ca](mailto:confidential@cpar.ca)) or up to and including an appropriate Board member.

The Whistleblower can report the event with their identity known or anonymously. CPAR will treat all reports in a confidential and sensitive manner.

Whistleblower protections are provided in two important areas -- confidentiality and against retaliation.

As possible, the confidentiality of the whistleblower will be maintained. However, identity may have to be disclosed to conduct a thorough investigation, to comply with the law and to provide accused individuals their legal rights of defense.

CPAR will not retaliate against a whistleblower. This includes, but is not limited to, protection from retaliation, including protection from an adverse employment action

such as termination, compensation decreases, poor work assignments, threats of physical harm, and/or revocation of status or funding. Any whistleblower who believes he/she is being retaliated against must contact the Human Resources, Executive Director, or Board Chair immediately.

The employee must exercise sound judgment to avoid baseless allegations. An employee who intentionally files a false report of wrongdoing will be subject to discipline up to and including termination. The right of a whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated.

All reports of illegal and dishonest activities will be promptly submitted to the Executive Director who is responsible for investigating and coordinating corrective action, including legal action. Crimes against person or property, such as assault, rape, and other serious crimes, will be treated as a criminal offence and should immediately be reported to local law enforcement personnel.

The Whistleblower shall receive acknowledgment of receipt of their report within five business days of the submission of the report. Supervisors, managers and/or Board members who receive the reports must promptly act to investigate and/or resolve the issue. Depending on the nature of the issue, the Whistleblower may or may not be provided with any further information regarding the investigation, disposition or resolution of the issue.

For general inquiries relating to this Whistleblower Policy or to obtain contact information for the persons listed in this Policy to whom a disclosure may be made, please send an email in confidence to: [confidential@cpar.ca](mailto:confidential@cpar.ca).

## **5. Monitoring and Review**

CPAR commits to have its Board of Directors and senior management team review and recommend amendments, additions or other pertinent changes on a regular basis, not exceeding five years. Alternatively, in cases where a deficiency or gap in the policy is identified, the policy may be altered – and approved – at any stage as deemed appropriate. Needed revisions, additions or other changes may be identified and proposed by any member of the CPAR Board of Directors or any member of CPAR staff (their inclusion into new versions of the policy will be managed by CPAR's Senior Management Team).

The approved Policy represents a component of the overall CPAR suite of policies and its implementation therefore falls within the normal purview of CPAR's management structure (i.e. line managers are responsible to maintain policy adherence as an element of their normal job duties and this represents one aspect of their regular performance reviews). In cases where managers believe they lack the resources or capacity to institute this or any other CPAR policy, they may raise this issue in writing with their direct supervisor and a plan for corrective action will be pursued.

## **6. Roles and Responsibilities**

CPAR's Executive Director is ultimately responsible for the implementation of the Whistleblower Policy across the organization. The Chair and the Board of Directors are responsible for oversight of the Executive Director's actions. CPAR staff and managers are responsible for the elements of the Policy that relate directly to their work.

**Approved:** November 2018