

## SAFE DISCLOSURE (“WHISTLEBLOWER”)

This document is the parent policy for any College procedures. Questions regarding this policy are to be directed to the identified Policy Owner.

<b>Category:</b>	G. People & Culture
<b>Policy Number:</b>	G25
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<b>Effective Date:</b>	July 10, 2025
<b>Policy Owner:</b>	Chief People & Culture Officer

### Objective:

A just workplace culture is fundamental to the success of public sector organizations in Alberta. To ensure Olds College of Agriculture & Technology (the “College”) maintains high standards of legal, ethical and fiscal behaviour, the College endorses a culture where employees and management work collaboratively to detect and remedy wrongdoing. In addition, employees who come forward to report wrongdoing are protected and valued.

The *Public Interest Disclosure (Whistleblower Protection) Act* (the Act) facilitates the disclosure and investigation of significant and serious matters that employees believe to be unlawful, dangerous or injurious to the public interest. Matters that are not wrongdoings, as defined under the Act, will be managed in accordance with other internal operational policies and procedures.

If the Designated Officer determines that an allegation does not meet the definition of wrongdoing within this policy, the employee will be referred in writing to an appropriate College process to address the allegation.

Allegations made through other policies may become a Protected Disclosure and will be addressed under this policy if an employee chooses to file a Protected Disclosure and the Designated Officer determines the allegation meets the definition of wrongdoing within this policy.

**Scope:** The Act, and this policy, applies to all employees of the College.

The purpose of this policy and its procedure is to:

- Provide guidance to employees on how to report wrongdoing within the College;
- Describe the roles and responsibilities of management and employees as they relate to the Act;
- Provide guidance on the management and investigation of disclosures by employees, as required by the Act;
- Support employees who come forward to report wrongdoing, and make them aware of the protection provisions afforded to them under the Act; and
- Detect and remedy wrongdoing within the College and in doing so, instill public confidence in the administration of the College.

## Policy:

The College will maintain a culture and systems that support the reporting of wrongdoing and that ensures the rights and obligations of all parties are upheld. All employees have the responsibility to report any wrongdoing which they have observed or which they reasonably suspect to have occurred.

The College will maintain an environment of safe disclosure when such a report is made, in which:

1. All credible allegations of possible wrongdoing will be taken seriously and be investigated in a timely manner.
2. Confidentiality will be strictly maintained and managed throughout the process.
3. Any retaliation, directly or indirectly, against anyone who in good faith makes a report will not be tolerated.
4. All individuals, against whom allegations are made, will maintain the rights, privileges and protections afforded to them through the *Protection of Privacy Act* and other applicable government legislation, College policies and collective agreements in effect at the time of the alleged misconduct.
5. Any disclosure of possible wrongdoing or a complaint of reprisal found to be in bad faith is considered to be a contravention of this policy.
6. The Board of Governors receive a report of all good faith reports at least annually.

All employees are expected to be aware of and uphold their obligations under this policy and the associated procedure. Non-compliance with this policy may result in disciplinary action from the College and/or penalties under the *Public Interest Disclosure (Whistleblower Protection) Act*.

### **Multiple Proceedings**

Where criminal and/or civil proceedings are ongoing, the College will conduct its own independent investigation and will make its own findings. The College will reasonably cooperate with law enforcement authorities in conducting their investigations.

### **Roles and Responsibilities**

Employees who believe wrongdoings are occurring within the College are protected from any type of reprisal when they seek advice or report the wrongdoing to the Designated Officer, or to the Public Interest Commissioner. Employees are responsible for:

- (a) reporting wrongdoings in good faith;
- (b) cooperating during an investigation; and
- (c) providing any information the investigator, Designated Officer or Public Interest Commissioner requires.

Supervisors are responsible for:

- (a) giving information or advice about the disclosure process to employees who are considering making a disclosure of wrongdoing.

It is not the role of a supervisor to advise whether alleged conduct is a wrongdoing under the Act, or to express any views about whether employees should make a disclosure.

Employees are protected from any reprisal as a result of seeking advice from their supervisor.

The Designated Officer is the individual appointed by the Chief Officer and is responsible for:

- (a) receiving and managing disclosures of wrongdoings made by employees; and
- (b) providing information and advice to employees who are considering making a disclosure.

The Designated Officer for the College is the Chief People & Culture Officer.

The Chief Officer is responsible for the overall administration and reporting requirements of the Act within the College. This includes:

- (a) establishing and maintaining this policy and procedure,
- (b) ensuring information about the Act and this policy is widely communicated to employees,
- (c) implementing corrective measures at the conclusion of an investigation, when required.

The Chief Officer of the College is the President & CEO.

The Board of Governors is responsible for:

- (a) promoting a culture that supports employees who come forward to report wrongdoings;
- (b) ensuring the College is compliant with the Act and supporting the Chief Officer in implementing corrective measures following an investigation.

When an investigation is conducted by the Public Interest Commissioner relating to the Chief Officer, the Board of Governors is responsible for receiving the Commissioner's report and implementing corrective measures, if required.

## Definitions:

**Chief Officer:** The President & CEO of the College.

**Commissioner:** The Public Interest Commissioner appointed by the Lieutenant Governor in Council in accordance with the Act.

**ConfidenceLine or Website:** The external service provider established for receiving complaints under the Act.

**Designated Officer:** The Chief Officer or an individual appointed by the Chief Officer to manage and report on Protected Disclosures made in accordance with this policy and related procedures. At the College, the Designated Officer is the Chief People and Culture Officer.

**Employee:** An individual who is engaged to work for the College under an employment contract, including faculty, staff, exempt casual and management employees.

**Bad Faith:** A disclosure or report which may be false, misleading or frivolous and:

- i. misuses or abuses the disclosure process;
- ii. is not reasonably purposeful or constructive, with no reasonable or appropriate outcome that would resolve the subject matter of the disclosure; and/or
- iii. is malicious, hostile, lacking in fairness and impartiality, dishonest, or generally against the concept of Good Faith Reporting.

**Good Faith:** A submission of information that is based on honest and reasonable belief, absent of clear malice, and does not seek to deceive.

**Imminent Risk:** Refers to situations that require immediate attention because they could pose significant risk to public health or safety, or impacts on the environment.

**Protected Disclosure:** A written report of wrongdoing made in good faith by an Employee in accordance with the Act and this Policy and related procedures.

**Retaliation and Reprisal:** Actions or measures that are taken, or threatened to be taken against an individual for reporting a possible Wrongdoing, including but not limited to:

- i. a dismissal, layoff, suspension, demotion or transfer, discontinuation or elimination of a job, change of job location, reduction in wages, change in hours of work or reprimand;
- ii. any actions or measures, other than those mentioned in item (i) above,

- that adversely affects the employment or working conditions of a Personnel, Contractor or Student;
- iii. intimidation or coercion; and
- iv. harassment or discrimination.

**Supervisor:** Anyone with employees who directly report to them. in the case of a Board Member, means the Chair of the Board of Governors.

**Wrongdoing:** The activity or conduct engaged in by an Employee in or relating to the College, as follows:

- i. 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
- ii. An act or omission that creates:
  - 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
  - a substantial and specific danger to the environment
- iii. Gross mismanagement, including an act or omission that is deliberate and that shows a reckless or wilful disregard for the proper management of:
  - Public funds or a public asset,
  - The delivery of a public service, including the management or performance of:
    - 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 arrangement, and
    - 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,
  - Employees, by a pattern of behaviour or conduct of a systemic nature that indicates a problem in the culture of the organization relating to bullying, harassment or intimidation;
- iv. Unethical behaviour in the care or use of live animals, including conducting teaching or research not approved by the Olds College Animal Care Committee or contravention of the Canadian Council on Animal Care.
- v. Knowingly directing or counseling an individual to commit a wrongdoing mentioned in the above clauses.

**Related Information:**

*Public Interest Disclosure (Whistleblower Protection) Act*  
*Protection of Privacy Act*  
*Access to Information Act*  
[Canadian Council on Animal Care Terms of Reference for Animal Care Committees](#)  
 B01/G02 Code of Conduct  
 B05 Institutional Animal Care & Use

**Related Procedures:**

G25 Safe Disclosure Procedure

**Review Period:**

3 years

**Revision History:**

New: 2014  
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