

CAIS Policy G-106 Whistleblower Policy

Purpose: To maintain integrity and ethical behaviour in the workplace and foster an environment where CAIS Personnel can report any wrongdoing, without fear of retaliation.

Application: All CAIS Personnel and extends to all CAIS activities.

Definitions: For the purposes of this Policy:

“Appropriate Authority” means any delegated employee who has the authority to make final decisions regarding CAIS Personnel wrongdoing, harassment claims and resulting actions. At CAIS, the Appropriate Authority is the Executive Director. The Chair of the CAIS Board or the Chair of the Board’s Governance Committee may be contacted in place of the Executive Director should any aspect of the complaint involve the Executive Director.

“CAIS Personnel” means a person who performs work or services for monetary compensation at CAIS (including all full-time and part-time employees, casual workers and individual contractors), employees or staff of any contractor or service provider carrying out business for CAIS, members of the CAIS Board of Directors, all CAIS volunteers (including those on Visiting Committees) and all attendees at CAIS-related conferences, workshops or other CAIS functions (including Member School representatives, speakers, contractors and other visitors).

“CAIS Staff” means a full-time employee of CAIS.

“Complainant” means any person that submits a complaint or report of wrongdoing.

“Respondent” means someone who’s alleged conduct is the subject of a complaint.

“Wrongdoing” includes any illegal action or violation of CAIS policy.

“Retaliatory Acts” means retribution, or reprisal against any Complainant as a result of the Complainant reporting an incident of wrongdoing, or against any CAIS Personnel that participates in an investigation relating to the allegation of wrongdoing.

Policy Statement:

Maintaining the highest standards of conduct requires vigilance from everyone in identifying concerns, and consultation and collaboration in addressing concerns. This responsibility to identify and raise concerns applies to each of us, irrespective of our seniority and whether or not the concern arises in the particular area within which we work. Whatever our position, we are all part of a single team; it is not acceptable for us to remain silent in circumstances known to us that reasonably raise a concern, on the theory that the concern is someone else’s responsibility to identify and raise.

This Policy has been adopted to ensure that you understand that you may report any wrongdoing that may adversely impact CAIS, CAIS Personnel or the public at large, without fear of retaliation or a negative impact on your employment or other status at CAIS.

This Policy is intended to supplement, not replace, CAIS's Freedom from Harassment, Discrimination and Workplace Violence Policy.

(a) Reporting Concerns

Normally, concerns can and should be raised openly with team leaders or supervisors with responsibility for the matter in question, and be dealt with openly through consultation, including with CAIS Staff. There will be no adverse consequences to the person raising a concern in good faith from the open reporting of the concern.

However, there may be circumstances where, despite this assurance, you are reluctant to raise a concern openly with the responsible person for the matter, or where, having raised it, you have a continuing concern about how the issue has been handled.

The purpose of this Policy is to address these circumstances and thereby encourage the reporting of concerns where there is a desire for confidentiality or fear of retaliation, by providing you with an avenue for confidential reporting as an added protection against adverse consequences from reporting.

In these circumstances, you should report the incident(s) to an Appropriate Authority.

(b) Anonymous Reporting

It is open to you to raise a concern anonymously; i.e., without disclosure of your name. The procedure for anonymous reporting is:

- to prepare a written explanation of the concern;
- to put the explanation in an envelope addressed to an Appropriate Authority; and
- to send the envelope to the addressee through internal or external mail.

(c) Confidentiality

It is assumed that all concerns raised under this Policy are being raised on a confidential basis; i.e., on the understanding that neither the name of the whistleblower nor any identifying particulars will be revealed without the consent of the whistleblower.

Every effort will be made to protect the confidentiality of the whistleblower's identity to the extent reasonably possible.

All records of workplace wrongdoing reports and subsequent investigations are considered confidential and will not be disclosed to anyone except to the extent required by law.

(d) CAIS Staff Responsibilities

CAIS Staff are directed to take all appropriate steps to prevent and stop wrongdoing in their areas of responsibility. Any CAIS Staff who is subjected to, witnesses, or is given written or oral complaints of wrongdoing or retaliation shall immediately report it to an Appropriate Authority.

CAIS Staff who are contacted by an individual seeking to file a complaint about wrongdoing in their area shall assist the Complainant in contacting an Appropriate Authority.

A Complainant who raises a complaint under this Policy should make it clear to the recipient of the disclosure that the intention is to raise a complaint under this Policy. This will ensure that the complaint is dealt with in accordance with this Policy and that the Complainant receives the full protection provided for under this Policy.

(e) Investigation

CAIS seeks to resolve claims of wrongdoing in the workplace as expediently as possible. Investigations shall be conducted, and the appropriate actions taken following the complaint.

The Appropriate Authority is responsible for determining and administering the methods and means for addressing complaints. To the extent a complaint may involve an individual from a Member School, the Appropriate Authority may, to the extent appropriate in the circumstances, determine to involve the Member School in addressing such complaint.

At the conclusion of an investigation, the Appropriate Authority shall create a report including the findings that have been proven and whether or not the Policy has been violated.

(f) Reporting

The Appropriate Authority shall advise the Complainant (unless anonymous) and the Respondent of the resolution of any investigation conducted under this Policy.

The Executive Director will bring to the attention of the CAIS Board of Directors any matter raised under this Policy that the Executive Director believes involves significant risk to CAIS.

(g) Disciplinary Actions

Upon concluding that an instance of workplace wrongdoing has occurred, the Respondent will be subject to disciplinary action, which may result in disciplinary and/or corrective action up to and including termination of employment and barring from CAIS activities, and possible legal action depending on the severity of the action. Disciplinary actions imposed by the Appropriate Authority will be determined on the basis of the facts of each case and the extent of harm to the CAIS interests and goals.

(h) Restrictions



There will be no adverse consequences for anyone who reports a concern in good faith under the protection of this Policy. However, it is a violation of this Policy for anyone to knowingly make a false complaint of wrongdoing or to provide false information about a complaint. Individuals who violate this Policy are subject to disciplinary and/or corrective action up to and including termination of employment and barring from CAIS activities (including conferences, workshops and other CAIS functions).

CERTIFICATION

I acknowledge that I have read and understand the CAIS Whistleblower Policy. I agree to adhere to this Policy and will ensure that CAIS Personnel working under my direction adhere to this Policy.

Name: _____ Signature: _____ Date: _____