

Section:	Employment	Date of Issue:	June 1, 2022
Title:	Human Resources Policy Manual	Revised:	
Subject:	Protected Disclosure (Whistleblower)	File No:	H350-1
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Approved By:	Senior Leadership Committee		

**1 POLICY**

1.01 GEF Seniors Housing (hereafter referred to as “GEF”) is committed to the highest standards of honesty, conduct, and integrity in all its activities. GEF requires all employees to act honestly, ethically, and with integrity and to safe guard the Tenants and facilities for which they are responsible.

1.02 At any time, if this commitment to honesty and integrity is not followed or appears in doubt, GEF will seek to identify and remedy such situations. Accordingly, when an individual has reasonable grounds to believe that an employee, volunteer, or member of the Board of Directors (Board) has committed, or is about to commit, a GEF’s whistleblowing event, GEF will ensure that:

- (a) The current or former employee, volunteer, or Board member may disclose this information;
- (b) The complainant will be protected from reprisals;
- (c) All parties connected to an investigation will be treated fairly and equitably;
- (d) Confidentiality will be maintained to the greatest extent possible; and
- (e) If wrongdoing is found, appropriate remedial and disciplinary actions will be taken.

**1.03 Reasonable Grounds of a Whistleblowing Event**

- (a) For the purposes of this policy and procedure, an individual may submit a whistleblowing complaint or allegation if any of the following incidents occur:
  - Accounting, auditing, or other financial reporting reveals fraud or misrepresentation;
  - Violations of Federal or Provincial laws that could result in fines or civil damages payable by GEF, which could significantly harm GEF’s reputation or public image;
  - Unethical business conduct in violation of any GEF policies; or
  - Danger to the health, safety, or well-being of Tenants, employees, volunteers, and/or the general public.

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**1.04 Officers**

(a) The Officers responsible for receiving and handling whistleblowing complaints are:

- Chief Executive Officer (CEO)
- Chair of the Board
- Chair of the Board’s Audit Committee

1.05 This policy and procedure will be in accordance with relevant Federal and Provincial legislation. This policy will be made available on GEF Connect and on GEF’s website.

1.06 For complaints regarding dissatisfaction, concerns, or frustrations about employment processes, policies, procedures, or conduct of co-workers, refer to Human Resources Policy Manual 5.02 Dispute Resolution.

1.07 For the reporting of workplace violence and aggression, refer to Human Resources Policy Manual 5.03 Workplace Bullying, Harassment, Sexual Harassment, and Discrimination.

1.08 For the reporting of workplace bullying, harassment, sexual harassment, and discrimination, refer to Human Resources Policy Manual 5.13 Workplace Violence and Aggression Prevention.

1.09 For the reporting and investigating of occupational accidents, injuries, illnesses, and near misses, refer to Human Resources Policy Manual 7.17 Accident, Injury, Illness, and Near Miss Reporting and Human Resources Policy Manual 7.18 Investigation.

**2 PURPOSE**

2.01 The purpose of this policy is to encourage current and former employees, volunteers, and Board members to report in good faith suspected or actual criminal conduct, unethical conduct, or other misconduct or serious concerns by or within GEF.

**3 SCOPE**

3.01 This Statement of Policy and Procedure applies to:

- All GEF Seniors Housing Sites
- All GEF Seniors Housing Board Members (current and former)
- All GEF Seniors Housing Employees (current and former)
- All GEF Seniors Housing Volunteers (current and former)

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#### 4 RESPONSIBILITY

4.01 Officers (Chief Executive Officer (CEO), the Chair of the Board, and the Chair of the Board's Audit Committee) are responsible for:

- Receiving and handling complaints.
- Protecting complainants from reprisals.
- Treating all parties connected to a complaint investigation fairly and equitably.
- Maintaining confidentiality regarding complaints and complainants to the greatest extent possible.
- Conducting investigations about possible whistleblowing events appropriately.
- Taking appropriate remedial and disciplinary actions if wrongdoing is found.

4.02 Employees and volunteers are responsible for:

- Conducting themselves with honesty and integrity within GEF.
- Treating complainants professionally and not harming, threatening, or discriminating against them in any way.
- Cooperating with Officers investigating complaints.

4.03 Complainants are responsible for:

- Reporting and submitting complaints or allegations about whistleblowing events appropriately.
- Acting in good faith and providing sufficient evidence to support their concerns.
- Cooperating with Officers investigating complaints.

#### 5 DEFINITIONS

5.01 **"Board of Directors (Board)"** means a body of elected or appointed members who jointly oversee the activities of a company or organization, which can include a non-profit organization or a government agency or corporation.

5.02 **"GEF Connect"** means the employee accessible database through SharePoint, which is a web-based collaborative platform that integrates with Microsoft Office.

5.03 **"Reasonable Grounds"** means a set of facts or circumstances that would cause a person of ordinary and prudent judgment to believe beyond a mere suspicion. It is more than a mere hunch or supposition, but much less than the level of proof that would be required to act or impose a disciplinary sanction.

5.04 **"Tenant"** means a person who rents any type of Unit in any of the GEF Seniors Housing Sites.

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5.05 **“Whistleblowing”** means a person, often an employee, who reveals information about activity within a private or public organization that is deemed illegal, immoral, illicit, unsafe, or fraudulent. This may be done internally within the organization or externally to a government or law enforcement agency. Whistleblowers may have legal protections from retaliation.

## 6 REFERENCES and RELATED STATEMENTS of POLICY and PROCEDURE

Human Resources Policy Manual 5.02 – Dispute Resolution

Human Resources Policy Manual 5.03 – Workplace Bullying, Harassment, Sexual Harassment, and Discrimination

Human Resources Policy Manual 5.13 – Workplace Violence and Aggression Prevention

Human Resources Policy Manual 7.17 – Accident, Injury, Illness, and Near Miss Reporting

Human Resources Policy Manual 7.18 – Investigation

[GEF.org – Protected Disclosure \(Whistleblower\)](#)

[Competition Act, RSC 1985, c C-34](#)

[Criminal Code, RSC 1985, c C-46](#) – Section 425.1 Threats and retaliation against employees

[Public Interest Disclosure \(Whistleblower Protection\), Act SA 2012, c P-39.5](#)

[Public Servants Disclosure Protection Act, SC 2005, c 46](#)

## 7 PROCEDURE

7.01 A whistleblowing complaint will be submitted in writing as a written statement and will be addressed to one (1), two (2), or all three (3) of the responsible Officers listed.

(a) The written statement should include the following information:

- Description of the activity;
- Date the complainant became aware of the activity;
- Name(s) of the individual(s) suspected of the activity; and
- Step(s) taken, if any, prior to making the complaint (e.g. spoke with Supervisor or the Human Resources Department).

(b) The written statement may be submitted via email or regular mail.

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- Email to: edennis@gef.org
- Mail to: GEF Seniors Housing  
Central Services  
14220 – 109 Avenue  
Edmonton, AB T5N 4B3

(c) The complainant may expect a confirmation of receipt of the written statement complaint within five (5) business days.

7.02 The complainant will not be discharged, terminated, demoted, suspended, threatened, harassed, or in any other way or manner discriminated against as a result of communicating a genuine concern (whether suspected or actual). Any employee found to be in violation of this policy when dealing with a complaint will be subject to disciplinary action, up to and including termination of employment or relationship with GEF.

7.03 The complainant is not required to prove the truth of the allegation, but they are required to act in good faith and to provide sufficient evidence to the person contacted in order to show that there are sufficient, reasonable grounds for concern. The amount of contact between the complainant and the investigating body (person or persons) will depend on the nature of the issue or concern and the detail and clarity of the information provided. The investigating body may seek further information from the complainant.

7.04 Any individual who does not act in good faith in reporting a suspected violation may be subject to disciplinary action, up to and including termination of employment or relationship with GEF.

7.05 Any complaint made under this policy will be treated as confidential and sensitive. In addition, the complainant will be provided the opportunity to remain anonymous, save and except in those circumstances where the nature of the disclosure and/or the resultant investigation make it necessary to disclose their identity (e.g. legal investigation or proceedings). In these cases, all reasonable steps will be taken to protect the complainant from harm as a result of having made a complaint or a disclosure related to the complaint.

**7.06 Investigation**

(a) Once a complaint is brought forward in writing, an investigation will commence. The Officer in receipt of the written complaint may enlist the assistance of other employees, legal council, accounting, or other advisors as may be appropriate to conduct the investigation.

(b) A report that summarizes the findings of the investigation will be prepared and any legal or other action(s) will be taken, where appropriate.

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- (c) Each complaint will be treated as confidentially as possible and with due care. The results of the investigation will be shared with the complainant to the extent possible and within a reasonable time period.

## **8 ATTACHMENTS**

None