



Policy Number GV2.152	Policy Section Governance	Effective: January 9, 2013 Amended: May 27, 2015
Title: Ethical Reporting Policy		Executive Sponsor: Chief Executive Officer

1. PURPOSE

CLBC strives to achieve the highest standards of ethical, moral and legal conduct.

In support of that objective, this policy establishes a framework for reporting suspected or known irregularities, including theft, fraud and corruption, impacting either Community Living British Columbia (CLBC) or individuals supported by CLBC. It establishes the protection of persons making such reports and the independence to which reports are investigated.

This policy is applicable to employees and others who work within and with CLBC, including individuals supported by CLBC programs, service providers, contractors, CLBC board members and the general public.

2. DEFINITIONS

Individual: A person 19 years of age or older who is eligible for CLBC services, as described in the *Eligibility for CLBC Supports and Services Policy*.

Irregularity: An act in contravention of, or failure to act in accordance with, legislation, regulations, policies, internal controls or other obligatory standards where the act or failure to act impacts CLBC or an individual supported by CLBC. Irregularities include, but are not limited to, issues such as undisclosed conflicts of interest, failure of service providers to comply with CLBC's health and safety standards, theft, fraud, or corruption.

Whistle-blower: A person reporting a known or suspected irregularity.

3. POLICY

3.1 CLBC encourages the reporting of irregularities and will protect the identity of whistle-blowers and persons cooperating in the investigation of irregularities, except as required by law.

3.2 Reported irregularities will be investigated and action will be taken as appropriate.

3.3 CLBC will not tolerate:

- Acts of retaliation, reprisal or harassment against employees, individuals and their families, and contractors who in good faith report and/or cooperate in an investigation of an irregularity; or
- Baseless, false or malicious allegations.

3.4 Where a reported irregularity involves an incorporated service provider and the board of the service provider or owner is considered by CLBC to be independent of the irregularity, CLBC will request the board of the service provider or owner to investigate and advise CLBC on the outcome.

4. PROCEDURES

Where the whistle-blower believes that the irregularity may constitute theft, fraud or corruption, the report should be made using the procedure outlined in this policy.

4.1 Unless the irregularities involve suspected theft, fraud or corruption, whistle-blowers are encouraged to use any other specific established processes that are in place. For example:

- Concerns about matters that fall under Collective Agreements may be resolved using the processes described within the Collective Agreements.
- Concerns about quality of services may be reported under the CLBC complaints process, as outlined in the *CLBC Complaints Resolution Policy*.

Reporting Irregularities

4.2 A whistle-blower can choose to notify the Manager, Internal Audit or the designated CLBC board member. The Manager, Internal Audit is independent from CLBC operations and reports directly to the Board.

4.3 Irregularities can be reported to the Manager, Internal Audit using one of the following three (3) options:

1. E-mail: CLBCreportline@gov.bc.ca
2. Mail enclosed information in a sealed envelope marked CONFIDENTIAL to:
Reportline
Community Living British Columbia
1200 West 73rd Avenue, Vancouver, BC V6P 6G5
3. Telephone the Manager, Internal Audit:
604-664-7953

4.4 Alternatively, where a whistle-blower wants to report irregularities to the designated CLBC board member, the information can be provided using either of the following two (2) options:

1. E-mail: CLBCboardreportline@gov.bc.ca

2. Mail enclosed information in a sealed envelope marked CONFIDENTIAL to:
Board Reportline
Community Living British Columbia
1200 West 73rd Avenue, Vancouver, BC V6P 6G5

4.5 A *Whistle-blower Report* form to assist in reporting irregularities is available at www.communitylivingbc.ca. Use of the form is optional.

4.6 If, during the course of an investigation, the facts appear to be indicative of an illegal act, CLBC will consider if and at what stage the investigation should be turned over to the relevant authorities.

4.7 As appropriate CLBC may contact the whistle-blower to provide information concerning the progress and/or outcome of the investigation to the extent that such disclosure does not compromise a person's rights, privacy or confidentiality.

Whistle-blower Protection

4.8 An employee who alleges retaliation, reprisal or harassment with respect to a whistle-blower activity should file a complaint with the Director, Human Resources.

4.9 A full review of an allegation of retaliation, reprisal or harassment will be conducted by the Director, Human Resources to determine whether the conduct in question constitutes reprisal and if appropriate, recommend an appropriate resolution.

5. PRACTICES

Examples of irregularities include, but are not limited to:

- Undisclosed conflicts of interest between an employee's or board member's duties to CLBC and his/her personal interests
- Failure of service providers to comply with CLBC's health and safety standards
- Failure of service providers to deliver contracted services
- The theft of monetary items including currency, cheques and funds belonging to an individual served by CLBC
- Intentional, unwarranted or unauthorized departures from CLBC's accounting policies, procedures or internal controls
- Intentional misrepresentation of facts
- Manipulation of accounting records to conceal or alter results
- Misuse, destruction or unauthorized access of CLBC documents, databases, computer systems, recorded data or messages
- Intentional false creation or alteration of documents, contracts, agreements, or any other record

- Waste or unauthorized use of public funds, resources, records, data or private information
- Unauthorized compensation, benefits, or rights received by a person or entity who works within or with CLBC
- A contravention of legislation or regulation
- The intentional concealment of or failure by employees to report known irregularities

6. REFERENCES

BC Freedom of Information and Protection of Privacy Act (FOIPPA)

BCGEU Collective Agreement Article 32.17 (regarding disclosure of information)

CLBC Complaints Resolution Policy

CLBC Conflict of Interest Policy - Board Members

CLBC Conflict of Interest Policy - Employees

CLBC Eligibility for CLBC Supports and Services Policy

CLBC Information about Ethical Reporting

CLBC Theft, Fraud and Corruption Policy

CLBC Whistle-blower Report Form

Standards of Conduct for CLBC Employees

Procedures and Guidelines for Ethical Reporting Matters