*Public Interest Disclosure* (*Whistleblower Protection*) *Act*

Policy & Procedures for [public entity]

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# **- PART 1 -** WHISTLEBLOWER PROTECTION POLICY

##  Policy Statement

 A just workplace culture is fundamental to the success of public sector organizations in Alberta. To ensure [public entity name] maintains high standards of legal, ethical and fiscal behavior, [public entity name] endorses a culture where employees and management work collaboratively to detect and remedy wrongdoing, and employees who come forward to report wrongdoing are protected and valued.

## Application

1. 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. The Act applies to employees of [public entity name].
2. The Act and this procedure only apply with respect to wrongdoings committed after the Act came into force on June 1, 2013, and to wrongdoings added to the amended Act that came into force on March 1, 2018.
3. Matters that do not relate to wrongdoings defined under the Act will continue to be managed in accordance with other internal operational policies & procedures.

## Purpose

1. The purpose of this policy and its subsidiary procedures is to:

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

# **- PART 2 -** ROLES & RESPONSIBILITIES

## The Public Interest Commissioner

1. The Public Interest Commissioner is responsible for carrying out the purpose of the Act. The Public Interest Commissioner reviews and investigates disclosures of wrongdoing and complaints of reprisal made under the Act by employees within public entities, and reports the outcome of any investigation, along with recommendations for corrective measures, to the chief officer, or to the board of directors and minister responsible for the public entity when required. The Public Interest Commissioner also provides advice to employees, and provides advice and support to designated officers in the management and investigation of disclosures.

## The Chief Officer

1. The chief officer is responsible for the overall administration and reporting requirements of the Act within [public entity name]. This includes establishing and maintaining this procedure, and ensuring information about the Act and the procedures is widely communicated to employees. The chief officer is also responsible for implementing corrective measures at the conclusion of an investigation, when required. The chief officer of [public entity name] is the **President & CEO**.

## The Designated Officer

1. The designated officer is the individual appointed by the chief officer to receive and investigate disclosures of wrongdoing made by employees within [public entity name]. The designated officer also has a responsibility to provide information and advice to employees who are considering making a disclosure. If a designated officer is not appointed, the chief officer fills this role. The designated officer for [public entity name] is [name] and may be contacted at [email address] or [phone number].

## The Board of Directors

1. The role of the board of directors is to promote a culture that supports employees who come forward to report wrongdoing, and to endorse this policy and procedures. The board of directors is responsible for ensuring [public entity name] 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 directors is responsible for receiving the Commissioner’s report and implementing corrective measures, if required.

## Supervisors

1. Supervisors are responsible for giving information and advice to employees who are considering making a disclosure of wrongdoing. Employees are protected for seeking advice from their supervisor, to the extent of the information requested and advice provided. A supervisor is anyone who has a reporting relationship with the employee. Further information relating to the role of supervisors is available on the Public Interest Commissioner’s website [here](https://yourvoiceprotected.ca/supervisors/).

## Employees

1. Employees who believe wrongdoing is occurring within [public entity name] are protected from any type of adverse employment action when they report the wrongdoing to either their designated officer, or to the Public Interest Commissioner. Employees have a responsibility to report wrongdoing in good faith, to cooperate during an investigation, and to provide any information the designated officer or Public Interest Commissioner may require.

# **- PART 3 -** PROCEDURES FOR EMPLOYEES TO REPORT WRONGDOING

## Reportable types of wrongdoing

1. The Act facilitates the disclosure and investigation of “wrongdoing”. The Act specifically defines the types of wrongdoing that may be reported and investigated:

	1. 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;
	2. an act or omission that creates:
		1. 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
		2. a substantial and specific danger to the environment;
	3. gross mismanagement, including an act or omission that is deliberate and that shows a reckless or wilful disregard for the proper management of:
		1. public funds or a public asset,
		2. 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**[[1]](#footnote-1)**, 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,

or

* + 1. employees, by a pattern of behavior or conduct of a systemic nature that indicates a problem in the culture of the organization relating to bullying, harassment or intimidation;
	1. knowingly directing or counselling an individual to commit a wrongdoing mentioned above.
1. This procedure **does not** apply to alleged contraventions of internal policies or directives, code of conduct matters, violations of collective agreements, or individual disputes been management and an employee relating to bullying, harassment or intimidation.

## Seeking advice

1. Employees considering making a disclosure may seek advice from their supervisor, their designated officer, or from the Public Interest Commissioner. Employees are protected from any adverse employment action as a result of seeking advice.
2. In circumstances where a complaint relates to the designated officer or chief officer, employees are encouraged to seek advice from the Public Interest Commissioner.
3. The office of the Public Interest Commissioner may be contacted at:

**Email:** info@pic.alberta.ca
 **Phone:** 1.855.641.8659

[www.yourvoiceprotected.ca](http://www.yourvoiceprotected.ca)

## Reporting wrongdoing

1. Employees may seek advice or make a disclosure to the designated officer or to the Public Interest Commissioner in the first instance of perceived wrongdoing despite any other procedure, code of conduct, or policy requiring an employee to take any other preliminary step to address their concern.
2. Employees who want to report wrongdoing may do so by contacting the designated officer. Employees should clearly indicate they are making a disclosure under the Act. The designated officer for [public entity name] is [name] and may be contacted at:

**Email:** [email address]
**Phone:** [phone number]

1. Employees must submit a disclosure of wrongdoing in writing, and may be asked to report the wrongdoing to the designated officer using the prescribed [Disclosure of Wrongdoing](#form) form in Appendix 1.
2. Employees who want to report wrongdoing to the Public Interest Commissioner may do so by submitting the online complaint form on the Public Interest Commissioner’s website. Employees may find the form [here](https://yourvoiceprotected.ca/for-employees/disclosure-form/).
3. Employees who submit a disclosure of wrongdoing to the designated officer may also inform the Public Interest Commissioner of the disclosure. The Public Interest Commissioner will consult with the designated officer and monitor the outcome of the matter.

## Anonymous disclosures

1. Employees considering making a disclosure anonymously should seek advice about doing so from the designated officer or the Public Interest Commissioner. Anonymous disclosures may not be acted on if there is inadequate particulars provided about the alleged wrongdoing and would therefore not permit the conduct of a fair and effective investigation.

## Disclosures relating to the chief officer or designated officer

1. Employees who have information about wrongdoing involving the chief officer or designated officer shall make a disclosure of wrongdoing to the Public Interest Commissioner.

## Reporting reprisals

1. The Act protects from reprisal any employee who has, in good faith:
	1. requested advice about making a disclosure from a supervisor, the designated officer, or the Public Interest Commissioner;
	2. made a disclosure under the Act;
	3. cooperated in an investigation under the Act;
	4. declined to participate in a wrongdoing; or
	5. done anything in accordance with the Act.
2. A **reprisal** is defined as taking, directing or counselling someone to take or direct:
	1. a dismissal, layoff, suspension, demotion or transfer, discontinuation of a job, change of job location, reduction in wages, change in hours of work or reprimand;
	2. any measure, other than those mentioned above, that adversely affects the employee’s employment or working conditions; or
	3. a threat to take any of the measures above.
3. [Public entity name] supports employees who come forward in good faith to report wrongdoing. Reprisals taken against employees will not be tolerated. A reprisal is an offence under the Act. Anyone who takes, directs or counsels a reprisal against an employee is liable to prosecution under the Act in addition to disciplinary action, including termination of employment, by [public entity name].
4. Employees who believe they have been the target of a reprisal may make a complaint of reprisal directly to the Public Interest Commissioner using the form on the Public Interest Commissioner’s website. The Complaint of Reprisal Form may be found [here](https://yourvoiceprotected.ca/for-employees/reprisal-form/).

# **- PART 4 -** PROCEDURES FOR MANAGING AND INVESTIGATING DISCLOSURES OF WRONGDOING

## Assessing disclosures of wrongdoing

1. After a complaint is received from an employee, the designated officer must acknowledge receipt of the disclosure within five business days.
2. Within 20 business days, the designated officer must decide whether an investigation is required, and notify the employee who made the disclosure of the decision and the reason for the decision.
3. To establish jurisdiction over a complaint of wrongdoing under the Act, the designated officer shall confirm:
	1. the disclosure relates to actions by an employee of [public entity name];
	2. the disclosure appears to have been made in good faith;
	3. the alleged wrongdoing occurred post enactment of the Act and less than two years have passed since the discovery of the wrongdoing;
	4. the allegation(s) appear to meet the definition of *wrongdoing* as defined in section 3 of the Act; and
	5. the allegation(s) has a public interest component, and are not based only on perceived wrongs perpetrated against the individual employee who made the disclosure.
4. Where a disclosure of wrongdoing does not meet the jurisdiction of the Act, the designated officer must notify the employee who made the disclosure. The designated officer may refer the employee to a more appropriate process or alternate authority.
5. An investigation is not required if:
	1. the subject‑matter of the disclosure could more appropriately be dealt with, initially or completely, according to a procedure provided for under this or another Act or a regulation;
	2. the disclosure relates to a matter that could more appropriately be dealt with according to the procedures under a collective agreement or employment agreement;
	3. the disclosure is frivolous or vexatious, has not been made in good faith or does not deal with a wrongdoing;
	4. the disclosure relates to a decision, action or matter that results from a balanced and informed decision‑making process on a public policy or operational issue;
	5. the disclosure does not provide adequate particulars about the wrongdoing as required by section 13 to permit the conduct of a fair and effective investigation;
	6. more than two years has passed since the date that the wrongdoing was discovered; or
	7. there is another valid reason for not investigating the disclosure (e.g., the subject-matter of the disclosure is under investigation by another authority or is currently before the courts.)
6. Disclosures alleging gross-mismanagement of employees are jurisdictional under the Act when all of the following apply:
	1. there is a pattern of behavior or conduct of a systemic nature by the alleged wrongdoer(s);
	2. the conduct or pattern of behavior indicates a problem within the culture of [public entity name] including a business unit within [public entity name];
	3. the conduct relates to bullying, harassment or intimidation; and
	4. the matter does not relate to an individual dispute between employees or between an employee and their manager.
7. When assessing a disclosure alleging gross-mismanagement of employees, designated officers shall consider whether all applicable mechanisms, including any human resource processes or processes under a collective agreement, to address bullying, harassment or intimidation, within the organization have been used or considered.
	1. If all other mechanisms have not been used or considered first, the designated officer may refer the employee to the alternate process. If the matter is referred to an alternate process, the employee remains protected from adverse employment action as a result of the initial disclosure or request for advice. If the matter is not resolved through the alternate process, the employee may return the matter to the designated officer.
	2. If no other mechanisms exist, there is a legitimate concern that employees may become the target of a reprisal, or based on the nature of the allegation the designated officer believes the matter should be investigated under the Act, the designated officer may investigate the matter.
8. An employee who is dissatisfied with the designated officer’s decision may bring the matter to the Public Interest Commissioner.

## Assessing good faith

1. Employees are required to make disclosures of wrongdoing in good faith.
2. An employee has made a disclosure in good faith if they have an honest belief in the wrongdoing they are alleging, absent of clear malice or intent to seek an unjust advantage, and regardless of subsequent negligence or error.
3. In the absence of clear evidence of malice, the benefit of the doubt must be afforded to the employee in that the information was provided in good faith.
4. A disclosure is not considered to be made in good faith if:
	1. the disclosure is seeking to deceive [public entity name];
	2. the allegations are non-serious (i.e., frivolous); or
	3. the allegations are vexatious in nature and seeking to cause emotional or material harm to those accused of wrongdoing.
5. [Public entity name] is not required under the Act to investigate a disclosure that has not been made in good faith. The designated officer shall decline to investigate allegations that have not been made in good faith.
6. The Act does not permit [public entity name] to penalize with adverse employment measures, an employee who has not made a complaint in good faith. Doing so may contravene the reprisal provisions of the Act.
7. In serious instances where an employee has knowingly made a false or misleading statement when making a disclosure, the designated officer shall consult with the Public Interest Commissioner to determine whether the conduct constitutes an offence under the Act. (See [Offences under the Act](#offences))

## Investigating disclosures of wrongdoing

1. The designated officer will notify the chief officer prior to initiating an investigation into a disclosure of wrongdoing. The designated officer may consult with the chief officer regarding the management and investigation of the disclosure.
2. The designated officer may request advice and support from the Commissioner during the management and investigation of a disclosure.
3. Prior to initiating an investigation, the designated officer shall prepare terms of reference including:
	1. the scope of the investigation;
	2. the human resources required to complete the investigation including external consultants and subject-matter experts;
	3. a preliminary list of witnesses to be interviewed;
	4. a preliminary list of records required for the purpose of the investigation; and
	5. a timeline for completion of the investigation.
4. The designated officer may collect, use and disclose personal information, individually identifying health information, and any other information that is considered necessary to manage and investigate the disclosure of wrongdoing.
5. The designated officer may require any employee of [public entity name] to provide any information or record and give written or oral replies to questions for the purpose of investigating the disclosure.
6. The designated officer may request assistance from any individual while investigating the disclosure of wrongdoing, including retaining the services of a third party where appropriate.
7. If, during an investigation, the designated officer has reason to believe that another wrongdoing has been committed or may be committed, the designated officer may investigate the wrongdoing and notify the chief officer.
8. If the designated officer receives more than one disclosure of wrongdoing with respect to the same matter, a single investigation may be conducted rather than a separate investigation.
9. The designated officer must conclude an investigation not more than **120 business days** from the date the disclosure of wrongdoing was received. The chief officer, with the Commissioner’s permission, may extend the time period to complete the investigation that the Commissioner considers to be appropriate in the interest of a fair and efficient outcome.
10. If the time period has been extended, the employee who submitted the disclosure must be promptly advised of when he or she may expect the next procedural step to occur or be completed.
11. At the conclusion of an investigation, the designated officer must prepare a report for the chief officer outlining the allegations investigated, whether the investigation found wrongdoing occurred, and recommendations for corrective measures.
12. The chief officer shall consider the recommendations, implement corrective measures to remedy the wrongdoing, and take appropriate disciplinary action as required, which may include termination of employment.
13. An employee who is dissatisfied with the outcome of the investigation by the designated officer or believes the matter has not been resolved may bring the matter to the Public Interest Commissioner.

## Ensuring procedural fairness

1. Disclosures of wrongdoing shall be investigated in accordance with the principles of procedural fairness and natural justice. This includes the right of an alleged wrongdoer(s) to be heard, and the right to have the matter investigated in an impartial manner.
2. Where a disclosure of wrongdoing is determined to have merit, the alleged wrongdoer(s) has the right to know the nature of the allegations made against them.
3. Where a disclosure of wrongdoing is determined to have merit, the designated officer must afford the alleged wrongdoer(s) the opportunity to respond to the allegations and the relevant information used to support the allegation. The designated officer may receive a response verbally or in writing, and in any manner the designated officer determines to be fair and appropriate.
4. The designated officer must recuse themselves from an investigation where they believe they are in a conflict of interest, or when they believe a personal bias exists. The chief officer may appoint an alternate individual to function as the designated officer, or may refer the matter to the Public Interest Commissioner.

## Protecting confidentiality

1. Designated officers must protect the identity of employees who make disclosures of wrongdoing, individuals alleged to have committed wrongdoing, and witnesses who participate in investigations.
2. Any persons engaged by the designated officer or chief officer to assist with managing or conducting an investigation into a disclosure of wrongdoing, must protect the identity of the individuals involved in the disclosure process, including the employee making the disclosure, individuals alleged to have committed the wrongdoings, and witnesses.
3. The identity of employees who make disclosures of wrongdoing, individuals alleged to have committed wrongdoing, and witnesses who participate in investigations, may only be revealed:

	1. to persons appointed as the designated officer;
	2. to the chief officer;
	3. to the Public Interest Commissioner;
	4. to persons engaged by the designated officer or chief officer to assist with managing or conducting an investigation into a disclosure of wrongdoing;
	5. to other persons when required by law; and
	6. when disclosing the identity of the whistleblower is absolutely necessary to ensure the right to procedural fairness and natural justice is respected.
4. The designated officer shall inform the employee who made the disclosure of wrongdoing, individual alleged to have committed wrongdoing, or witnesses who participated in the investigation of the intent to reveal their identity prior to doing so. In the event of a dispute regarding the release of the identity of a party, the designated officer shall seek advice from the Public Interest Commissioner.
5. Where a wrongdoing has been found, the chief officer, or the board of directors when the wrongdoing relates to the chief officer, may identify the wrongdoer(s) to others within the organization or to external authorities for the purpose of taking appropriate corrective action.

## Information Security

1. The designated officer will ensure all information obtained through the course of an investigation is secured, remains confidential, and is only disclosed when necessary to manage and investigate disclosures of wrongdoing.
2. Designated officers must maintain all records and information relating to investigations electronically on a secure network drive with access privileges restricted to the designated officer and chief officer. Where additional persons are required to assist with an investigation, all records must be maintained electronically on the secure network drive with file permissions established for each specific case.
3. Case related information must not be stored on the hard drive (i.e. desktop) of a computer. Use of portable media (i.e. USB flash drives) to transfer case related information is prohibited unless the portable media device is encrypted using 256-bit Advanced Encryption Standard.
4. Paper evidence or evidence that cannot be converted electronically, must be stored in a secure location accessible only to the designated officer. If securing evidence is not possible, the designated officer may contact the Public Interest Commissioner for advice.

## Referring disclosures of wrongdoing

1. The designated officer may refer a disclosure of wrongdoing to an alternate authority, including to the Public Interest Commissioner. Factors in considering whether to refer a disclosure of wrongdoing include:
	1. whether the subject-matter of the disclosure would more appropriately be dealt with by another authority;
	2. the complexity of the subject-matter of the disclosure;
	3. whether a real or perceived conflict of interest may exist;
	4. the resources and expertise required to conduct a fair and effective investigation; and
	5. whether the subject-matter pertains to an individual whose position in the organization is superior to that of the designated officer.
2. When a disclosure of wrongdoing is referred to an alternate authority, the employee who made the disclosure must be informed of the decision.

## Matters constituting an imminent risk

1. Notwithstanding any other provision in this procedure, where the subject-matter constitutes an imminent risk of a substantial or specific danger to the life, health or safety of individuals, or to the environment, the designated officer is authorized to notify, without the consent of the disclosing employee, any individual within [public entity name] and any appropriate authority required to respond to the danger, including calling 911.
2. The designated officer must also notify:
3. the appropriate law enforcement agency;
4. in the case of a health-related matter, the Chief Medical Officer of Health; and
5. the department, public entity, or other entity responsible for managing, controlling or containing the risk, if any exists.
6. The designated officer must suspend any investigation into the matter, and may only resume after any charge relating to an alleged offence, or any investigation by a law enforcement agency or the Minister of Justice and Solicitor General, has been finally disposed of.

## Matters involving a possible offence

1. If during an investigation the designated officer has reason to believe that an offence has been committed under a provincial or federal Act or regulation, the matter must be reported to a law enforcement agency and to the Minister of Justice and Solicitor General as soon as reasonably practicable.
2. The designated officer must suspend any investigation into the matter, and may only resume after any charge relating to an alleged offence, or any investigation by a law enforcement agency or the Minister of Justice and Solicitor General, has been finally disposed of.

## Offences under the Act

1. It is an offence to willfully obstruct, or counsel or direct a person to willfully obstruct a designated officer in the performance of their duties.
2. It is an offence to knowingly withhold material information or make a false or misleading statement, orally or in writing, to a designated officer.
3. It is an offence to destroy, mutilate, alter a document or thing, falsify a document or make a false document, conceal a document or thing, or direct or counsel to do any of the foregoing, knowing that the document or thing is likely to be relevant to an investigation by the designated officer.
4. The designated officer may seek advice from the Public Interest Commissioner when there is a concern that an offence may have been committed under the Act.

## Access to information requests

1. An applicant does not have a right of access under the *Freedom of Information and Protection of Privacy Act* to information that would reveal the identity of a person who has requested advice about making a disclosure, made a disclosure or whose complaint has been referred to the Labour Relations Board pursuant to the Act*.* However, ifthat information can reasonably be severed from a record, an applicant has a right of access to the remainder of the record.[[2]](#footnote-2)

# **- PART 5 -** ANNUAL REPORTING REQUIREMENTS

1. The chief officer will prepare a report annually as required by the Act, and include:
2. the number of disclosures received by or referred to the designated officer;
3. the number of disclosures acted on, and the number of disclosures not acted on, by the designated officer;
4. the number of investigations commenced by the designated officer;
5. in the case of an investigation that results in a finding of wrongdoing, a description of the wrongdoing and any recommendations made or corrective measures taken in relation to the wrongdoing; and
6. if corrective measures in relation to the wrongdoing have not been taken, the reasons provided.
7. The chief officer’s report will be included in the annual report for [public entity name].
8. The chief officer will not publicly identify an employee who requested advice, made a disclosure of wrongdoing or complaint of reprisal, or publically disclose individually identifying health information within the annual report.

# Definitions

**“Act”** means the *Public Interest Disclosure* (*Whistleblower Protection*) *Act*

**“Chief Officer”** means the president and CEO

**“Commissioner**” means Public Interest Commissioner

“**Employee”** means an employee of [public entity name], or an individual who has suffered a reprisal and is no longer employed by [public entity name]

**“Designated Officer”** means the senior official designated by the chief officer to manage and investigate disclosures under the Act

**“Good faith”** means an honest belief absent of clear malice or intent to seek an unjust advantage

“**Personal information”** means personal information as defined in the *Freedom of Information and Protection of Privacy Act*

**“Reprisal”** means a measure taken, directed or counselled contrary to section 24(2) or (3) of the Act

**“Regulation”** means the *Public Interest Disclosure* (*Whistleblower Protection*) *Regulation*

**“Wrongdoing”** means a wrongdoing referred to in section 3 of the Act, and includes an alleged wrongdoing

# References

[*Public Interest Disclosure (Whistleblower Protection) Act*](http://www.qp.alberta.ca/documents/Acts/P39P5.pdf)*,* SA 2012, c P-39.5 (as amended)

[*Public Interest Disclosure (Whistleblower Protection) Regulation*](http://www.qp.alberta.ca/documents/Regs/2013_071.pdf)*,* AR 71/2013

# Appendix 1 **DISCLOSURE OF WRONGDOING FORM**

**TYPE OF WRONGDOING**

**Which of the below categories does the wrongdoing apply?\***

Contravention of an Act or a regulation (contravention of a law).

An act or omission that creates a substantial and specific danger to the life, health or safety of individuals.

An act or omission that creates a substantial and specific danger to the environment.

Gross mismanagement of public funds or a public asset.

Gross mismanagement of the delivery of a public service.

Gross mismanagement of employees – by a pattern of behavior or conduct of a systemic nature that indicates a problem in the culture of the organization relating to bullying, harassment or intimidation.

Counselling an individual to commit a wrongdoing mentioned above.

 **\*If none of the above, the *Public Interest Disclosure Act* does not apply. Consider other internal policies and procedures.**

 **GENERAL CONTACT INFORMATION**

While anonymous complaints may be accepted, you are encouraged to include your name and contact information. For more information about the advantages and disadvantages of making an anonymous complaint, speak with the designated officer.

**Last Name Given Names**

 

**Title**



**Work Phone Other Phone Email**

  

**Branch/Unit/Department (if applicable)**

**DISCLOSURE DETAILS**

Use this area to provide information about the wrongdoing and the person(s) alleged to have committed the wrongdoing. Include, if known, the following details:

* + A description of the wrongdoing
	+ Dates associated with the wrongdoing
	+ Name and title of the alleged wrongdoer(s)
	+ Name and title of any other parties involved
	+ If applicable, the specific division or business unit where the wrongdoing occurred
	+ Whether you have reported the wrongdoing using any other internal procedure, and the outcome



**DECLARATION**

*\*I declare that all of the information provided in this disclosure is true and accurate to the best of my knowledge.*

 **Signature Date**Please submit this form and any other supporting documents to the designated officer. If you are unable to include all details about the alleged wrongdoing on this form, you may submit further details as a separate document; however, please include it when you submit this form.

1. No contracts or arrangements have been identified or described in the regulations as of the date of this policy. [↑](#footnote-ref-1)
2. Sec. 6(9) *Freedom of Information and Protection of Privacy Act,* RSA 2000, cF-25 [↑](#footnote-ref-2)