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| Section: Operations | |
| Policy: 1.0 Whistleblower Policy | |
| Approved | November 2013 |
| Revised | October 2015 |

Purpose

The purpose of this whistleblower policy is to provide direction to all current and former employees, contractors, volunteers, and partners of VOI regarding the communication of concerns on questionable financial, operational, or support related matters.

The Whistleblower

For the purpose of this policy the “Whistleblower” is meant to be anyone who has reported a whistleblower incident.

Whistleblower Incident

A “whistleblower incident” is defined as a *serious* concern related to VOI’s financial, operational or support matters. This *is not* intended to cover general questions or issues that should be addressed with a direct supervisor. (Note: Any type of abuse towards Supported Individuals is not covered in whistleblower policy and should be reported immediately to a supervisor)

Whistleblower incidents include, but are not limited to:

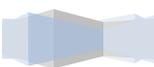
- Theft of groceries, time, or other agency resources;
- Not following pre-designated departmental budgets;
- Knowingly providing sub-standard support to Supported Individuals;
- Receiving personal kickbacks or gifts from contractors which could create bias in the tendering process;
- Inappropriate recording or reporting of revenues and expenses;
- Inappropriate classification of assets and/or liabilities;
- A deliberate disregard or circumvention of VOI policies;

Policy Statements

It is the policy of VOI that the Whistleblower must immediately communicate *whistleblower incidents* as soon as the Whistleblower becomes aware of such situations.

It is the policy of VOI that the Whistleblower will not be discharged, demoted, suspended, threatened, harassed, or in any other manner discriminated against as a result of communicating a *whistleblower incident*. Any VOI employee found to be in violation of this policy will face disciplinary action. Continued violation of this policy (i.e. continued harassment of the Whistleblower) may result in termination of employment.

It is the policy of VOI that to the fullest extent possible, VOI will treat as confidential the identities of those involved in the disclosure and investigation process. All information collected during the course of the investigation will remain confidential except as is necessary to conduct a fair investigation and to



take corrective or remedial action or in accordance with applicable law. Action will be taken against an individual who fails to protect the confidential nature of the investigation process including those who make the report, respondents to the allegation(s) or witnesses.

VOI will not protect a Whistleblower who intentionally makes an improper disclosure. Improper Disclosure means a disclosure made in bad faith, which includes providing false information, making disclosures that the Discloser knows are baseless, or making repeated disclosure concerning matters that have been previously examined and determined by the Senior Officer.

Improper Disclosure will be viewed as Employee misconduct and will be met with appropriate disciplinary action, up to and including termination of employment.

Procedures

A complaint may be made by any current or former employee, contractor, volunteer, and partner of VOI by submitting it to the Executive Director. Complaints may be made:

1. Via email at info@visionsofindepndence.org
2. Via Telephone 204 453 5982
3. Via Fax: 204 452 0714
4. Via mail to Jennifer Hagedorn, 211-530 Century Street, Winnipeg, MB R3H 0Y4. Indicate on the envelope: Confidential: Whistleblower Information.

Reports of alleged violations should be factual, not speculative and should contain as much specific detail as possible to allow for assessment. The report should be candid and should contain all of the relevant information that the complainant knows regarding the allegation or concern. It should also contain any corroborating information to support an investigation.

If an investigation is deemed appropriate by the senior officer VOI will follow the procedures set out in 1.1 Workplace investigations.

