



WHISTLEBLOWER POLICY

Responsibility:	<i>Superintendent of Business Services and Treasurer</i>
Legal References:	<u>Criminal Code of Canada: s. 425.1</u>
Related References:	<u>Administrative Procedure 4310 – Whistleblower Line;</u> <u>Administrative Procedure 4360 – Principles of Business Conduct for Board Employees.</u>
Effective Date:	<i>June 2010</i>
Revisions:	<i>April 10, 2017, November 12, 2018, December 11, 2023</i>
Reviewed:	<i>November 15, 2021</i>

1. Preamble

- 1.1 The Waterloo Region District School Board (WRDSB) is dedicated to the principles of strong corporate governance combined with the highest level of personal and corporate ethical standards.
- 1.2 The WRDSB is committed to the highest standards of openness, honesty and accountability. The WRDSB aspires to conduct its business affairs with honesty and integrity. The WRDSB places extreme value on the reputation of the WRDSB.
- 1.3 All employees and other parties of the WRDSB are encouraged to disclose any business wrongdoing that may adversely impact the WRDSB, the WRDSB's stakeholders, staff or the public at large. All individuals shall be provided the opportunity to remain anonymous when reporting concerns.
- 1.4 The policy is intended as a clear statement that if a business-related wrongdoing by any of its staff/contractors/suppliers/volunteers is identified and reported to the WRDSB, it will be dealt with expeditiously and thoroughly investigated and remedied to the extent possible.

2. Roles and Responsibilities

- 2.1 The responsibility for the administration and enforcement of this policy rests with the Director of Education and the Superintendent, Business Services & Treasurer of the Board.
- 2.2 The Director of Education is authorized to develop the administrative procedures necessary to implement this policy.

3. General

- 3.1 The provisions of this policy are independent of, and supplemental to, the provisions of collective agreements between the WRDSB and its Unions relative to grievance procedures, and to any other terms and conditions of employment.

- 3.2 There are existing procedures in place to enable employees to raise grievances about their own employment. Similarly, [Administration Procedure 3740 - Prevention and Resolution of Workplace Harassment](#) is in place to handle allegations of harassment.
- 3.3 This policy is intended to cover business related concerns that employees and other parties may have. The concerns are intended to include, but are not limited to the following:
 - 3.3.1 Theft, embezzlement or misappropriation of funds, goods and supplies, resources, other assets or time;
 - 3.3.2 Fraud;
 - 3.3.3 Misuse or abuse of authority in the context of purchasing supplies or services;
 - 3.3.4 The use of WRDSB money, property, resources, or authority for personal gain or other non-WRDSB related purposes except as provided under WRDSB policy or procedure;
 - 3.3.5 Conflict of interest (when a personal interest influences the objective exercise of one's duties);
 - 3.3.6 Breach of confidentiality;
 - 3.3.7 Showing undue favour to a contractor or supplier of goods/services; or
 - 3.3.8 Breach of or failure to implement or comply with any WRDSB business related policies or procedures.

4. Vexatious and Malicious Complaints

- 4.1 For a matter to be considered vexatious or malicious or an abuse of process, the allegation must be such that no reasonable person would treat it as an allegation made in good faith. Vexatious and malicious complaints are deemed to be initiated without merit and are done to annoy, embarrass or harass.
- 4.2 A report may not proceed to formal investigation if the matter is determined to be vexatious or malicious.
- 4.3 Vexatious or malicious complaints made about an employee will not be tolerated.