

Huron Perth Healthcare Alliance	
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Whistleblower Policy	Review/Effective Date: May 31, 2007
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Introduction

The Huron Perth Healthcare Alliance (HPHA) is committed to the highest possible standards of openness, honesty and accountability. In line with that commitment, we expect employees, physicians, volunteers and others that we deal with (HPHA Representatives) who have serious concerns about any aspect of the HPHA's work to come forward and voice those concerns.

Employees, physicians and/or volunteers are often the first to realize that there may be something seriously wrong within HPHA. However, they may decide not to express their concerns because they feel that speaking up would be disloyal to their colleagues or to HPHA. They may also fear harassment or victimization.

This policy document makes it clear that HPHA Representatives can report suspected wrongdoing without fear of victimization, subsequent discrimination or disadvantage. It is intended to encourage and enable employees to raise serious concerns within HPHA rather than overlooking a problem or seeking a resolution of the problem outside HPHA.

This Policy applies to all employees, physicians, volunteers and those contractors working for HPHA. It is also intended to provide a method for other stakeholders (suppliers, patients, patient supports etc.) to voice their concerns regarding HPHA's business conduct.

The Policy is also intended as a clear statement that if any wrongdoing by HPHA or any of its representatives or by any of its contractors or suppliers is identified and reported to HPHA, it will be investigated and remedied promptly and thoroughly. Anyone found to have engaged in fraudulent or dishonest conduct is subject to disciplinary action by HPHA up to and including civil or criminal prosecution when warranted. HPHA will further examine the means of ensuring that such wrongdoing can be prevented in future.

A whistleblowing or reporting mechanism invites all employees and other stakeholders to act responsibly to uphold the reputation of their organization and maintain public confidence. Encouraging a culture of openness within the organization will also help this process. HPHA aims to ensure that serious concerns are properly raised and addressed within HPHA. This Policy is a key tool in enabling the delivery of good governance practices.

What is whistleblowing?

HPHA Representatives are often the first to know when something is going seriously wrong. A culture of turning a "blind eye" to such problems means that the alarm is not sounded and those in charge do not get the chance to take action before real damage is done. Whistleblowing can therefore be described as giving information about potentially illegal or underhanded practices, i.e. wrongdoing.

What is wrongdoing?

Wrongdoing involves any unlawful or illegal behaviour and can include (but is not limited to):

- An unlawful act whether civil or criminal;
- Breach of HPHA's Corporate Code of Conduct for Staff, Physicians and Volunteers;
- Breach of or failure to implement or comply with any approved HPHA policy;
- Knowingly breaching federal or provincial laws or regulations;
- Unprofessional conduct or conduct that is below recognized, established standards of practice;
- Questionable accounting or auditing practices;
- Dangerous practice likely to cause physical harm or damage to any person or property;
- Failure to rectify or take reasonable steps to report a matter likely to give rise to a significant and avoidable cost or loss to HPHA;
- Abuse of power or authority for any unauthorized or ulterior purpose; or
- Unfair discrimination in the course of the employment or provision of services.

This list is not definitive, but is intended to give an indication of the kind of conduct that might be considered as "wrongdoing".

Who is protected?

This Policy is set in the context of the statutory provisions of the Canadian Securities Association (CSA) Multilateral Instrument 52-109 and the U.S. Sarbanes-Oxley Act Section 806. Any employee who makes a disclosure or raises a concern under this Policy will be protected if the employee:

- Discloses the information in good faith;
- Believes it to be substantially true;

- Does not act maliciously or make false allegations; and
- Does not seek any personal or financial gain.

Who should you contact?

Anyone with a complaint or concern about HPHA should contact their supervisor, manager or Vice President responsible for the department that provides the relevant service. Who you contact will depend on the seriousness and sensitivity of the issues involved and who is suspected of malpractice. There is no such thing as an "unofficial" or "off-the-record" complaint.

Anonymous concerns will be investigated to the extent possible and reasonable based on the level of detail provided in the complaint. Please click here to submit your anonymous concern [Whistle Blower Form](#)

As an alternative, you can contact (i) Vice President, Workplace Health, Marie Ormerod, (519)272-8210 ext. 2470 (ii) any one of the two Human Resources Officers, Maria Faulkner, (519) 272-8210 ext. 2433 or Mark Momentoff (519) 272-8210 ext. 2471; (iii) Chief Executive Officer, Andrew Williams, (519) 272-8202.

How HPHA will respond

HPHA will respond to your concerns. In order to protect individuals and those accused of misdeeds or possible malpractice, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. Some concerns may be resolved page 3 of 3 by agreed action without the need for investigation. If urgent action is required, this will be taken before any investigation is conducted.

Where appropriate, the matters raised may be investigated by management, the Board of Directors, internal audit, or through the disciplinary process. They may be referred to an outside party such as the police, or an external auditor. The overriding principle that HPHA will keep in mind is the best interests of HPHA and its stakeholders. The amount of contact between you and the officers considering the issues will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information provided.

Concerns will be investigated as quickly as possible. If it is necessary to refer a matter to an external agency, this may result in an extension of the investigative process. The seriousness and complexity of a complaint also may have an impact upon the time taken to investigate a matter.

Once a complaint has been made (other than anonymous complaints), a designated person will write to you:

- acknowledging that the concern has been received;
- indicating how he/she proposes to deal with the matter;
- giving an estimate of how long it will take to provide a final response;
- telling you whether any initial enquiries have been made; and
- telling you whether further investigations will take place and if not, why not.

HPHA recognizes that you need to be assured that the matter has been properly addressed. Thus, subject to legal constraints, we will inform you of the outcomes of any investigation.

HPHA will respect the confidentiality of any whistleblowing complaint where the complainant requests confidentiality, insofar as it is possible to do that and still properly follow up and to verify complaints.

Prevention of recriminations, victimization or harassment

HPHA wishes to reassure its representatives that you will not be fired, demoted, reassigned, disciplined or subject to any other punishment for reporting wrongdoing by the HPHA or its representatives or for exercising any rights guaranteed to you by federal and provincial laws including but not limited to the Occupational Health and Safety Act, Environmental Protection Act, Employment Standards Act, Labour Relations Act and the Human Rights Code.

Any Manager, supervisor or employee who harasses, disciplines or takes other adverse action against an HPHA representative in retaliation for whistleblowing or the exercising of legal rights in violation of this non retaliation clause is subject to discipline, up to and including immediate termination for cause.

False or malicious allegations

HPHA will view very seriously any allegations that prove not to be substantiated or which prove to have been made maliciously or knowing them to be false. HPHA will regard the making of any deliberately false or malicious allegations as a serious disciplinary offence that may result in disciplinary action, up to and including dismissal for cause.