Policy	
Document Name: Whistle Blower Policy	Section: Organizational
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Approved by: Executive Leadership Team	Author/Title: VP, People and Culture
	Signature:  VP, People and Culture

Scope

This policy and procedure apply to all employees of Headwaters Health Care Centre (Headwaters) as well as medical, dental, midwifery, volunteers, students, vendors, and contractors. These individuals shall be referred to collectively as '*Workers'* herein. The requirements apply whether working on Headwaters property or working on behalf of or representing Headwaters elsewhere.

Policy Statement

The purpose of this policy is to enable workers of Headwaters to communicate genuine concerns in relation to corporate criminal activity, breach of legal obligations, financial malpractice, fraud, unethical conduct, falsification of records and any attempt to conceal information relating to the above, free from disciplinary action by Headwaters, including without limitation demotion, termination or other adverse effects on employment or placement at Headwaters or any threats thereof in the event of reporting an issue. The policy applies whether or not the information is confidential.

This service is intended to complement existing reporting processes. If you have a concern you are encouraged to first discuss the issue with your leader.

Exclusion

This policy does not apply to employee's or staff member's terms and conditions of employment, physician contracts, volunteers, student or resident arrangements with Headwaters, or any aspects of working relationships with Headwaters, including complaints of harassment (staff or patients) or disciplinary matters. Such complaints are dealt with under current Headwaters policies and procedures (which may be accessed through People and Culture) and federal or provincial laws as appropriate. For purposes of clarity, this policy also does not apply to clinical concerns that fall under current legislation, such as the *Regulated Health Professions Act, 1991* and the *Quality of Care Information Protection Act, Schedule B*. .

Definitions

Agent: is a person who acts on behalf of Headwaters for business, financial or contractual matters.

Whistle Blower: is a worker or agent of Headwaters, who reports corporate related misconduct to persons or entities that have the authority and presumed willingness to take corrective action.

Procedure

Workers who want to express concerns or issues related to ethical or legal practices of Headwaters may make them in confidence, to an external firm retained for this purpose. Based on the information provided, this firm will review and determine whether an investigation should be conducted and what form it should take.

A detailed process will be made available through the selected outside firm.

The investigation, depending on the nature of the matter raised may be:

- Referred to the external auditors;
- Investigated externally by the firm used for this policy or other independent organization, or;
- Referred back for internal investigation by Headwaters (as listed under Exclusions).

Following the investigation, some matters may need to be referred to a relevant outside organization, such as the police.

If it is determined that no investigation is warranted, this decision will be communicated to the person making the disclosure through the reporting structure.

The Vice President, People and Culture will provide quarterly reports to Headwaters CEO & President, as required. If the matter pertains to the CEO & President, the Board of Director Chair will be consulted.

Workers who become aware of any wrongdoing or suspected wrongdoing are encouraged to make a report as soon as possible by contacting the external firm ClearView Connects™. Acts of wrongdoing may be reported in two ways to ClearView Connects™:

1. Online through ClearView Connects™ secure website at http://www.clearviewconnects.com
2. Over the phone through the dedicated toll-free number 1-877-854-6630

Guiding Principles

The Guiding Principles relating to this policy are:

- Full confidentiality for the person making disclosure, except in the case of an alleged criminal or civil offence where disclosure to the police and/or courts may be required;

- Should the identity of the person making a disclosure be identified, Headwaters will take seriously any threats of reprisal towards the person making the disclosure, and take appropriate action where warranted;
- Allegations, which are determined to be false or malicious after investigation, will be considered to be mischief and treated seriously and appropriate disciplinary action will be taken, if warranted; and
- Headwaters will not accept to conceal evidence and/or information relating to matters covered under this policy.
- The policy offers protections for complainants through the anonymous nature of the Clearview Connects services. Both complainants and respondents would be able to establish safety plans through the Headwaters Security Services in any instance of perceived threat.

References

Headwaters Code of Conduct Policy

Headwaters Privacy- Confidentiality Policy

Process for Using the Whistle Blowing Protection Policy Reporting System

