

PUBLIC INTEREST DISCLOSURE (WHISTLEBLOWER PROTECTION) POLICY

Policy Section:	Office of the President & CEO	Effective Date:	October 7, 2026
Policy Owner:	President & CEO	Last Revised:	August 5, 2026
Policy Administrator:	Executive Director, People & Culture	Review Scheduled:	Every 4 Years
Approver:	President & CEO		
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A. POLICY STATEMENT

As a publicly funded post-secondary institution, Keyano College recognizes its responsibility to act in the public interest and to ensure the prudent stewardship of public funds, assets, and resources.

The College is committed to an open, ethical and accountable culture in which employees may seek advice about, and disclose, significant and serious wrongdoing in good faith without fear of reprisal. The College will maintain a fair, confidential, timely and legally compliant process for receiving, managing, investigating and reporting disclosures under Alberta's Public Interest Disclosure (Whistleblower Protection) Act and Regulation.

1. SCOPE

- 1.1 This Policy applies to the College, the Board of Governors, the President & CEO in the statutory role of Chief Officer, the Designated Officer, all employees, and any person who manages, directs, advises on or participates in a disclosure, investigation, corrective action or employment decision affecting a protected employee.
- 1.2 The statutory right to make a disclosure under the Act applies to an Employee as defined by the Act and Regulation. The College may receive concerns from students, contractors, volunteers or members of the public through other appropriate processes, but those concerns are not automatically statutory disclosures under this Policy unless the person is an Employee for purposes of the Act.
- 1.3 This Policy does not replace emergency reporting, occupational health and safety reporting, privacy breach reporting, harassment or violence processes, collective agreement procedures, criminal reporting obligations, or any other legal duty to report. A matter may be referred to another process where appropriate, subject to the Act.

2. STATUTORY ROLES AND DESIGNATION

- 2.1 **Chief Officer:** The President & CEO is the Chief Officer for the College under the Public Interest Disclosure (Whistleblower Protection) Act and Regulation.
- 2.2 **Designated Officer:** In accordance with section 7(1) of the Act, the President & CEO designates the most senior leader of the People & Culture department as the Designated Officer responsible for managing and investigating disclosures under the Act.
- 2.3 **Alternate Designated Officer:** Where the Designated Officer has an actual, potential or perceived conflict of interest, is implicated in a disclosure or is unavailable, the Chief Officer will designate an appropriate alternate in writing for the matter. The alternate may exercise the powers and must perform the duties of the Designated Officer in relation to that matter.

3. GUIDING PRINCIPLES

- 3.1 **Good-Faith Access:** Employees may seek confidential information or advice from their supervisor, the Designated Officer, the Chief Officer or the Public Interest Commissioner. Requests will be handled confidentially to the extent permitted by law and consistent with safety, procedural fairness and the proper administration of the Act.
Employees may make a disclosure directly to the Designated Officer, through a College-authorized reporting channel such as ConfidenceLine, or directly to the Commissioner. ConfidenceLine is an additional confidential intake channel and does not replace the Designated Officer or Commissioner. No College process or third-party reporting arrangement may restrict or delay an Employee's direct access to the Designated Officer or Commissioner.
- 3.2 **Independence and Conflict Management:** A disclosure will be managed impartially. If the Designated Officer has an actual, potential or perceived conflict of interest, the disclosure will be referred to an alternate designated by the President & CEO. If the disclosure concerns the President & CEO, the employee may disclose directly to the Commissioner, and any Commissioner report will follow the statutory route, including to the responsible Minister and Board of Governors where applicable.
- 3.3 **Procedural Fairness:** Investigations will respect natural justice and the rights of the discloser, persons alleged to have committed wrongdoing and witnesses. Findings will be based on relevant information and a fair opportunity to respond, subject to confidentiality and safety requirements.
- 3.4 **Confidentiality and Data Minimization:** Information will be collected, used, disclosed and retained only as authorized and reasonably necessary. Identities and records will be protected on a need-to-know basis. The Policy does not authorize disclosure of solicitor-client privileged information, litigation-privileged information or prescribed quality-assurance records.

- 3.5 **Timeliness:** The College will meet the statutory time limits for acknowledging a disclosure, deciding whether to investigate, communicating that decision, completing an investigation and providing required reports, subject only to permitted extensions.
 - 3.6 **Protection from Reprisal:** No person may take, direct or counsel a reprisal against an employee because the employee, in good faith, sought advice, made a disclosure, cooperated in an investigation, declined to participate in wrongdoing or acted under the Act. Reasonable human resource management decisions made in good faith remain permitted.
 - 3.7 **Accountability and Corrective Action:** Substantiated wrongdoing will result in appropriate recommendations, corrective action and, where warranted, disciplinary action in line with *Employee Progressive Policy & Procedure*. Actions will be assigned, monitored and closed by an accountable authority.
 - 3.8 **Truthful Cooperation, Records Management and Preservation:** All persons participating in the process must cooperate honestly, must not obstruct the process, and must preserve documents and things likely to be relevant to an investigation.
 - 3.9 **Public Reporting:** The Chief Officer will prepare the annual disclosure report required by the Act and ensure it is included in the College's publicly available annual report without publicly identifying protected individuals.
 - 3.10 **Awareness and Accessibility:** The College will maintain a culture of integrity by ensuring employees receive regular awareness and education (as deemed necessary) on safe disclosure processes and protections, enabling them to report concerns effectively and in good faith.
4. Further details on the reporting mechanisms including investigation mechanisms, timelines and resources can be found in the *Public Interest Disclosure (Whistleblower Protection) Procedure* document.

B. DEFINITIONS

- (1) **Chief Officer:** means the President & CEO of Keyano College, who is prescribed as the College's chief officer under the Regulation.
- (2) **College:** means Keyano College.
- (3) **Commissioner:** means the Public Interest Commissioner appointed under the Act.
- (4) **Designated Officer:** means the Executive Director, People & Culture, designated under this Policy by the Chief Officer to manage and investigate disclosures under the Act.
- (5) **Disclosure:** means a good-faith disclosure of wrongdoing made by an Employee in accordance with the Act.
- (6) **Employee:** means an individual treated as an employee under the Act and Regulation, including a former

employee who alleges reprisal where the statutory definition applies.

(7) Reprisal:

means a prohibited employment-related measure or threat taken, directed or counselled because an Employee engaged in conduct protected by the Act.

(8) Wrongdoing:

means a wrongdoing described in Part 1, section 3 of the Act :

3(1)(c) gross mismanagement, including an act or omission that is deliberate and that shows a reckless or wilful disregard for the proper management of

- (i) public funds or a public asset,
- (ii) 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, 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,

- (iii) employees, by a pattern of behaviour or conduct of a systemic nature that indicates a problem in the culture of the organization relating to bullying, harassment or intimidation.

C. RELATED POLICIES

- Code of Conduct Policy
- Data Breach of Security Policy
- Integrity in Research & Scholarly Activity Policy
- Privacy Breach Policy
- Privacy Policy
- Respectful Workplace Policy

D. RELATED LEGISLATION

- Public Interest Disclosure (Whistleblower Protection) Act & Regulation
- Protection of Privacy Act & Ministerial Regulation

E. RELATED DOCUMENTS

- Breach of Research Integrity Procedure
- Data Breach of Security Procedure
- Privacy Procedure
- Public Interest Disclosure (Whistleblower Protection) Procedure

F. REVISION HISTORY

Date (mm/dd/yyyy)	Description of Change	Sections	Person who Entered Revision (Position Title)	Person who Authorized Revision (Position Title)
3/20/2018	New Policy.	All	Executive Planning Officer	President & CEO
11/15/2024	Policy content move to a new template & update of Policy administrator position. No content updates.	N/A	Legislative Compliance/Policy & Procedure Coordinator Executive Assistant to President & CEO	Interim President & CEO
08/05/2026	Full revision of Policy and its name; major updates across all sections to ensure alignment with Public Disclosure Act. New effective date was set. Previous Safe Disclosure Policy will be rescinded.	All	Executive Director, People & Culture	President & CEO