

	Whistleblower	
	Policy Type:	Council-Management-Delegation
	Number:	CMD-R-4.5
	To be Reviewed:	Once per term
	Approval Date:	July 17, 2023
	Motion Number:	23.C.237
	Revised Date(s):	

Policy Statement:

The Town of Okotoks (the "Town") is committed to principles of accountability, transparency and integrity in its operations, and ensuring ethical conduct on the part of its employees and elected officials. The Town is further committed to protecting its revenue, property, information and other assets from acts of misappropriation, wrongdoing and/or serious misconduct ("Wrongdoing") by Town employees, members of Council, contractors, subcontractors, suppliers, or members of the public For the purposes of this policy Wrongdoing includes conduct that may be considered dishonest, unethical, wasteful, improper, fraudulent or illegal. Wrongdoing includes, but is not limited to:

- a. Serious violations of Town policy or procedure; and
- b. Misappropriation or gross misuse of Town funds, equipment or other assets, information or resources for any illegal, improper or unethical purpose.

The Town will strive to maintain an environment in which whistleblowers feels confident in their ability to report, in good faith, any suspected acts or allegations of Wrongdoing, without fear of reprisal, and where employees and elected officials are held accountable substantiated acts of Wrongdoing.

This Policy is managed by the Chief Administrative Officer (CAO), or designated senior official, and includes reporting and investigation of activities that may be considered serious misconduct under the Employee Code of Conduct, and other internal Community Safety & Organizational Effectiveness policies.

In the event the Town receives a Complaint under this Policy, the CAO or the CAO's designated senior official will respond accordingly, including but not limited to, taking the following key measures:

- a. Ensure procedures for receiving and reviewing Complaints are followed including:
 - Outlining the investigative process to the whistleblower,
 - Gathering additional information as necessary,
 - Answering any questions related to the process.
- b. Ensure that investigations of Complaints are conducted in a confidential, fair and timely manner;
- c. Ensure that investigations of Complaints are referred to an external investigation where applicable.

- d. Ensure that the whistleblower and all parties who participate in the investigation in good faith are protected against reprisal.
- e. Ensure that the information collected, used and disclosed in accordance with applicable privacy policies and subject to the Town's obligations under the *Freedom of Information and Protection of Privacy Act*;
- f. Make recommendations for appropriate remedies in relation to findings of Wrongdoing;
- g. Ensure follow-up and enforcement of any disciplinary action or corrective measures; and
- h. Ensure Complaints and investigation outcomes are appropriately reported and maintained where required.

Referral of Complaints:

In the event that a Complaint involves the CAO, or the CAO otherwise has a conflict of interest with respect to the nature of the Complaint or a person involved in the Complaint, the CAO will refer the Complaint to the Mayor or Deputy Mayor for carriage in accordance with this Whistleblower Policy.

In the event that a Complaint involves the Mayor or a member of Council, the Wrongdoing will be reviewed under the Code of Conduct Bylaw.