

SAMPLE WHISTLEBLOWERS POLICY

PURPOSE

To set out the policies and procedures related to whistleblowing within the First Nations Health Organization.

POLICY

The First Nations Health Organization requires all employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. The organization will encourage and give support to “whistleblowers” - employees who raise concerns about employees who they suspect to have committed wrong doing, fraud, abuse and/or activities that go against the code of ethics and conduct and quality of care provided by the First Nations Health Organization.

The organization will not retaliate against a whistleblower. This includes, but is not limited to, protection from retaliation in the form of an adverse employment action such as termination, compensation decreases or poor work assignments and threats of physical harm. The right of a whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated.

Whistleblower protections are provided in two important areas: confidentiality and retaliation. The confidentiality of the whistleblower will be maintained. However, identity may have to be disclosed to conduct a thorough investigation, to comply with the law, and to provide accused individuals their legal rights of defense.

A person is not entitled to the protections under this policy unless he or she reasonably believes that the information reported is, or is about to become, a matter of concern for the First Nations Health Organization, and reports the information in good faith.

POLICY APPLICATION

1. If an employee has knowledge of a concern of illegal or dishonest/fraudulent activity, the employee is to contact his or her immediate supervisor or the Director of Health. All reports or concerns of illegal and dishonest activities will be promptly submitted by the reporting receiving supervisor to the Director of Health, who is responsible for investigating and coordinating any necessary corrective action. Any concerns involving the Director of Health should be reported to Health Board Chair or the Health Councillor, depending on the governance structure of the organization.
2. The whistleblower is not responsible for investigating the alleged illegal or dishonest activity or for determining fault or corrective measures. The immediate supervisor or the Director of Health is charged with these responsibilities.
3. While the whistleblower does not have to put concerns in writing, it is recommended they do and as a minimum they document the situation including dates, times, witnesses and action taken.
4. The information from the whistleblower should indicate if the situation relates to:
 - A criminal offence;
 - A breach of a legal obligation;
 - A miscarriage of justice;
 - A danger to the health and safety of any individual; or

- The deliberate covering up of information tending to show any of the above.
5. As soon as the information is received from the whistleblower the information is to be treated with the highest level of confidentiality.
 6. All situations will undergo a full investigation.
 7. The First Nations Health Organization will not reprimand employees who report suspected misconduct or behaviour.
 8. Any whistleblower who believes he or she is being retaliated against must contact the Director of Health immediately.