



YMCA of Greater Vancouver Whistleblower Policy

Policy

The YMCA of Greater Vancouver is committed to open, accountable, ethical and transparent governance which encourages a culture of integrity and honesty. An important aspect of accountability and transparency is a mechanism to enable all individuals to voice concerns in a responsible and effective manner when they discover information which they believe shows serious malpractice. In order to meet current standards in the area of possible accounting and auditing irregularities and fraud as well as to discourage illegal activity and unethical business conduct, the YMCA has developed this Whistleblower Policy. This policy is intended to provide an environment in which individuals interacting with the YMCA, including but not limited to employees, volunteers, participants and contractors, are encouraged to raise serious concerns without risk of discrimination or adverse employment actions. The YMCA ensures confidentiality and anonymity for the person reporting a concern, unless it is incompatible with a fair investigation or required by law.

Procedure

Reporting Responsibility

It is the responsibility of every individual who is aware of or suspects a violation of the YMCA's codes of conduct or matters of concern/wrongdoing to report the incident as soon as possible using the reporting standards in this policy.

Matters of Concern

1. Example of concerns relating to financial, accounting and auditing practices
 - Fraud, including falsification of records
 - Breaches of internal financial controls and audit procedures
 - 'Side deals' or 'under the table' dealings with contractors for personal benefits
 - Unethical or illegal practices
 - Unauthorized use, misuse or waste of YMCA assets or funds
2. Examples of concern relating to quality or malpractice of care
 - Abuse of individuals
 - Negligence of children, youth or vulnerable adults
3. Examples of violations of human resource policies and legislation
 - Bullying and harassment
 - Discrimination of any kind
4. Other examples
 - Criminal offenses of any kind
 - Danger to health and safety

Reporting Procedures

Concerns about the YMCA may be disclosed in the following ways (either verbally or in writing):

Employees and Volunteers

Employees and volunteers shall report their concern to their direct Supervisor/General Manager, recognizing that this depends on the seriousness and sensitivity of the issues involved and who is suspected of wrongdoing. Any issue brought to a supervisor shall be immediately forwarded to the Vice President (VP)/President and CEO (CEO).

In any case, employees and volunteers may submit their concern directly to a Vice President or to the CEO of the YMCA.

A concern involving a Vice President should be submitted directly to the CEO.

A concern involving the CEO or the Board of Directors should be submitted to the Chair of the Board of Directors.

A concern involving the Chair of the Board of Directors should be submitted to the Chair of the Governance Committee.

Participants, Suppliers, Contractors etc.

Any individual who is aware of inappropriate behaviour shall report his/her concern directly to a Vice President or to the CEO of the YMCA.

Acting in Good Faith

Any person submitting an allegation must be acting in good faith with reasonable grounds for believing there is a breach of the code of conduct or inappropriate practices. A person who makes an unsubstantiated allegation which is knowingly false or has been made maliciously or in bad faith will be subject to disciplinary action, which may include termination of employment or the volunteering role.

No Retaliation

No person who in good faith and under this policy reports any violation/wrongdoing or submits a concern shall suffer harassment, retaliation or adverse consequences. Any individual who retaliates against someone reporting an incident in good faith will be subject to discipline, which may include termination of employment or the volunteering role.

Confidentiality

The YMCA will treat every allegation made by whistleblowers as confidential and privileged. Therefore, the identity of any person who makes a good faith allegation must be kept confidential and anonymous, if requested, unless it is incompatible with a fair investigation or required by law. In such instances, the whistleblower will be informed in advance. Information will only be made available on a need-to-know basis.

The YMCA will pay due regard to fairness to any individual named in the allegation, the seriousness of the issue, and credibility of the information.

Handling of Reports

All reports will be taken seriously. The YMCA is committed to investigate allegations of improper activity and inappropriate behaviour as soon as possible, taking into account the seriousness and complexity of the reported issue. An officer will be assigned by the Vice President or the CEO and will conduct an objective, timely and fair investigation, respecting the rights of individuals. Complacency, deception or cover up of wrongdoings and violation against a code of conduct is not tolerated.

Investigation

If on preliminary investigation the allegation is judged to be without substance or merit, the matter will be dismissed and the whistleblower informed of the decision and reasons for such a dismissal.

If, at the conclusion of an investigation, the YMCA determines that a violation or wrongdoing has occurred, the YMCA will take remedial action equal to the severity of the offence. This may include disciplinary action with termination of contracts and reporting to police and regulatory authorities.

Retention of Reports

The YMCA will maintain a record of all reported allegations. All documents related to reporting, investigation and enforcement of this policy will be kept in accordance with YMCA policies and applicable law.

Related Policies:

- Code of Conduct
- Statements of Understanding