



Reporting Ethical Codes of Conduct Violations Policy

Purpose:

Caledon Community Services' Ethical Codes of Conduct requires staff, volunteers, program/student placements to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. All Caledon Community Services' (CCS) staff, volunteers, program/student placements must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

Policy:

All CCS staff, volunteers, program/student placement have an obligation to report in accordance with this policy:

- (a) Questionable or improper accounting or auditing matters, and
- (b) Violations and suspected violations of CCS' Ethical Codes of Conduct (hereinafter collectively referred to as Concerns).

Definitions

Concerns: For the purpose of this policy, Concerns include, but are not limited to:

- CCS' Ethical Code of Conduct violation
- Undisclosed conflicts of interest
- Failure to comply with CCS' health and safety standards
- The theft of monetary items including currency, cheques, funds, goods belonging to a CCS client or belonging to CCS
- Intentional, unwarranted or unauthorized departures from CCS accounting policies, procedures or internal controls
- Intentional misrepresentation of facts
- Manipulation of accounting records to conceal or alter results
- Misuse, destruction or unauthorized access of CCS documents, databases, computer systems, recorded data or messages
- Intentional false creation or alteration of documents, contracts, agreements, or any other record
- Waste or unauthorized use of CCS' resources, records, data or private information
- Unauthorized compensation, benefits, or rights received by a stakeholder or entity who works within or with CCS
- A contravention of legislation or regulation
- The intentional concealment of or failure to report known Concerns

Procedure:

CCS will investigate any allegation of a Concern thoroughly and promptly. CCS will conduct objective and impartial investigations regardless of the position, title, length of service or relationship with CCS of the person who is involved in, or is the subject of such investigation.

Clients and External Stakeholders

If a CCS client or external stakeholder suspects or has knowledge of a Concern they will be directed to use the Feedback Form and follow the CCS' Complaint Policy.

Staff, Volunteers, Program/Student Placements

Any staff, volunteer, program/student placement who suspects or has knowledge of a Concern is obligated to immediately notify her/his immediate supervisor.

If the CCS staff, volunteer, program/student placement has reason to believe that their supervisor may be involved, the individual is to immediately notify their Director or designate. If the matter involves the Director, the report should be made to the CEO.

In the event that the allegation involves the CEO, the Incident investigation form documenting the allegation is to be forwarded to the Chair of the Board of Directors. In the event that the allegation involves the Chair of the Board of Directors, the Incident Investigation form documenting the allegation is to be forwarded to the Vice-Chair of the Board of Directors.

Whistleblower Protection

Staff, volunteers, program/student placements are to refer to CCS' Whistleblowing Protection Policy.

Investigation

The known or suspected Concern is to be documented on CCS' Incident Investigation Form.

Upon notification or discovery of a suspected Concern, the Divisional Director, CEO or designate will promptly investigate following the Workplace Incident Investigation Policy. The investigation shall commence within five (5) business days of receipt of the Incident Investigation Form and must be resolved within twenty (20) business days.

As appropriate, other authorities are to be contacted or consulted immediately, including (but not necessarily limited to) CCS' legal counsel, OPP, licensing authorities, the Ministry of Community & Social Services, and the Canada Revenue Agency.

Security of Evidence

Once a suspected or known Conduct is reported immediate action is taken to prevent theft, alteration or destruction of relevant records. Such actions include but are not limited to:

- Removing the records
- Placing them in a secure location
- Limiting access to the location where the records currently exist
- Preventing the individual suspected of committing the misconduct from having access to the records

Confidentiality

Staff, volunteers, program/student placements will not discuss the known or suspected Concern nor the investigation with anyone other than their immediate supervisor, Manager, Human Resources, their Divisional Director, the CEO or designate and the police, as appropriate.

All participants in the investigation must keep the details and results of the investigation confidential. Particulars of the investigation may be disclosed by the CEO or designate, as appropriate, with potential witnesses if such disclosure would further the investigation.

Personnel Actions

The individual against whom an allegation has been made (henceforth referred to as the 'Respondent') will be provided with written notice of the specific allegations made towards them. A copy of this notice will be placed in their personnel file. At that time they may be suspended from all activities with CCS during the investigation. They will also be clearly instructed not to interfere or attempt to interfere with the investigation or the other individuals involved in the investigation.

The Respondent may resume some or all duties at the sole discretion of their Director whilst the investigation is being conducted, if appropriate to the circumstances.

During the course of the investigation, the Respondent will be given an opportunity to respond to the allegations made against them, both in writing and in the course of investigative interviews held by the Investigating parties.

Once the investigation has been concluded, appropriate employment consequences will be implemented towards the Respondent if the investigation results show the allegations to be founded. The employment consequences will include disciplinary measures ranging from written warning to termination of employment depending on the severity of the offence and any relevant mitigating factors.

Follow-up

The alleged Ethical Codes of Conduct violation investigation is not to be discussed with the media by any person other than the CEO or designate as authorized by the CEO in accordance with CCS' Media Relations Policy.

The results of the investigation are to be documented. If the report concludes the allegations are founded, the report may be forwarded to the local police services.

All legal and personnel actions, any records, documents and other evidentiary material is forwarded to the appropriate department and held in a secure location.

A written summary of the results of the investigation shall be provided to the Respondent (with a copy to their personnel file), the CEO and/or Board Member as appropriate.

REFERENCES

Ethical Codes of Conduct
Whistleblower Protection Policy

Feedback Form
Complaint Policy
Privacy Policy
Incident Investigation Form
Workplace Incident Investigation Policy
Progressive Discipline Policy
Termination Policy

Date Developed: July 2015

Date Approved: January 2016