



Title:	Whistleblower Policy
Department:	Human Resources
Approved By:	Board of Directors
Effective Date:	November 4, 2024
Status:	Approved
Last Revision Date:	October 31, 2024
Next Review/Revision Date:	October 2026

Purpose

The GTHS is committed to the highest ethical standards. We require directors, officers, employees, and volunteers (representatives of GTHS) to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Representatives of GTHS must practice honesty and integrity in fulfilling their responsibilities and must comply with all applicable laws and regulations.

Policy

This policy covers instances where an employee, volunteer, or other stakeholder has evidence of activity (“Reportable Activity”) by any GTHS employee, volunteer, officer or retained consultant (including external auditors) that to his/her/their knowledge constitutes:

- Accounting, auditing, or other financial reporting fraud or misrepresentation;
- Violations of federal or provincial laws that could result in fines or civil damages payable by the GTHS, or that could otherwise significantly harm the GTHS reputation or public image;
- Unethical business conduct in violation of any GTHS policy, including, but not limited to the Code of Conduct;
- Danger to the health, safety, or well-being of employees, volunteers and/or the public, and animals.

Reporting Responsibility

This policy is intended to encourage and enable representatives of GTHS to raise serious concerns internally so that GTHS may address and correct conduct and actions prejudicial to the interests and policies of GTHS. It is the responsibility of all representatives of GTHS to report concerns about violations or suspected violations of law or regulations that govern GTHS operations.

TRAINING/COMMUNICATION ABOUT POLICY

The GTHS trains employees about the whistleblower policy during orientation and in providing the Employee Manual for review. The Board of Directors members are trained during their board orientation and provided with the BOD policy manual to review. Other volunteers are provided with the information in the volunteer guidebook during their onboarding. The public can access our whistleblower policy on our website.



Procedure

The Executive Director (ED) is responsible for investigating and resolving most types of reports made under this Policy or appointing an external neutral investigator. In certain circumstances, this individual may refer the matter to, or seek the assistance of, employees or others depending upon the nature of the Reportable Activity. For example, if the Reportable Activity relates to a safety concern, they may refer the Reportable Activity to an appropriate safety representative or committee such as the GTHS Joint Health and Safety Committee (JHSC). However, under no circumstances will a matter be referred to an employee of the GTHS who is the subject of any Reportable Activity or is otherwise an inappropriate person to assist with the investigation.

Representatives of GTHS are required to report any suspected ethical and legal violations in writing as soon as it comes to their attention as follows:

A report concerning:	Is reported to:	And is investigated by:
GTHS employee or volunteer	Executive Director	ED and/or senior management
Executive Director	Chair of the Board	Executive Committee
Concerning a Board Director or Officer	Chair of the Board	Executive Committee
Concerning the Chair of the Board	Vice Chair of the Board or if no Vice Chair to the Executive Committee or other similar functioning committee.	Executive Committee with the chair of the board recused

The ED or Executive Committee representing the Board of Directors then has the responsibility to investigate all reported complaints and take appropriate follow-up action consistent with GTHS legal and/or employment obligations as appropriate. Reports must include sufficient information to permit a full investigation of the allegations. Concerns and/or suggestions of a minor or more general nature should be directed to the employee or volunteer's immediate supervisor.

Reports to the Board/ Executive Director Responsibility

The ED will advise the Board of all complaints (and the summary results of investigations) on a quarterly basis. The ED office shall retain any reports of Reportable Activity and any resulting investigations for a period of not less than seven (7) years. Such preservation obligation shall include the making of written summaries of any oral complaints or reportable activity.



Accountability & Safeguards

Complainants are accountable to act in good faith when reporting any Reportable Activity. Persons making allegations that prove not to be substantiated, and which are shown to be malicious, retaliatory, or knowingly false will be subject to disciplinary action.

GTHS will not dismiss, suspend, demote, discipline, deny a benefit or otherwise disadvantage any person, because that person has, in good faith, reported an instance of actual or suspected wrongdoing in accordance with this policy, or participated in an investigation in connection with a report of actual or suspected wrongdoing. It is contrary to the values of GTHS for anyone to retaliate against any employee, volunteer or member who, acting in good faith and based on reasonable belief, reports a violation, or a suspected violation. A representative of GTHS who retaliates against someone who has reported a violation in good faith is subject to disciplinary action up to and including termination of employment or termination of volunteer duties.

Confidentiality

Reports may be submitted on a confidential basis but must include sufficient information to facilitate a full and appropriate investigation, including the name of the complainant. Information will be kept confidential to the extent possible, consistent with the need to conduct an adequate and fair investigation in accordance with this policy directives.