

POLICY AND PROCESS: Reporting of Improper/Unethical Behaviours or Activities (Whistleblowing)

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Approved by: Board of Directors, Chair of the Board	Signature(s): _____

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Policy Statement

The Guelph General Hospital seeks to create a culture that supports and promotes Hospital values and behaviours. To this end, the Hospital encourages staff, volunteers, Board members and affiliated individuals to report in good faith, suspected improper/unethical behaviours or activities, also referred to as whistleblowing. It is understood that an individual initiating such a report, will be protected from threats or acts of retaliation.

This policy aims to encourage staff, volunteers, Board members and affiliated individuals to voice their concerns with respect to improper/unethical behaviours or activities in the workplace, thereby facilitating a more open and honest work environment.

1. Staff, volunteers, Board members and affiliated individuals have a duty to report in good faith improper/unethical behaviours or activities.
2. Improper/unethical behaviours or activities may include:
 - mismanagement,
 - waste of funds,
 - an abuse of authority,
 - a specific danger to public health,
 - a specific danger to staff, patient and/or public safety,
 - damage to the environment,

POLICY AND PROCESS: Reporting of Improper/Unethical Behaviours or Activities (Whistleblowing)

- a violation of law, rule, regulation or policy that may not be addressed by a more appropriate hospital process.
3. All written formal reports alleging improper/unethical behaviour or activity will be thoroughly and expeditiously investigated by the Hospital. While conducting a thorough investigation and implementing an appropriate remedy, all efforts will be made to maintain the confidentiality of the individual(s) involved.
 4. The Hospital will provide appropriate support to an individual(s) who reports in good faith, improper/unethical behaviour or activity.
 5. Where an allegation of improper/unethical behaviour or activity is substantiated, appropriate remedies may include one or more of the following courses of action:
 - formal discipline,
 - termination of employment with cause,
 - the filing of a report to an individual's professional governing body,
 - measures taken in conjunction with an affiliated individual's employer and/or governing body,
 - measures taken in accordance with the By-law of the Hospital,
 - legal action.
 6. Staff, volunteers, Board members and affiliated individuals who in good faith report suspected improper/unethical behaviour or activities will be protected from threats or acts of retaliation. Interference with the conduct of an investigation or retaliation against an individual, who files a report, whether the report is substantiated or unsubstantiated, may itself result in disciplinary action. Interference or retaliation may take the form of direct contact between parties or more subtle actions such as shunning, reassignment, repeating of rumours and breaches in confidentiality.
 7. Staff, volunteers, Board members and affiliated individuals accused of improper/unethical behaviour or activities will be provided with full and fair opportunity to respond to allegations.
 8. Staff, volunteers, Board members and affiliated individuals must recognize that a report found to have been made in bad faith will be considered serious misconduct, could result in severe disciplinary action being taken by the Hospital and could result in legal action by the accused individual.

POLICY AND PROCESS: Reporting of Improper/Unethical Behaviours or Activities (Whistleblowing)

Definitions

Staff – includes employees, students and Professional Staff as defined in the By-law of the Hospital.

Affiliated individuals – includes contract staff, patients, family members of patients, visitors, post graduate trainees, volunteers and community partners.

Board Members – includes the Board of Directors and members of Board Committees.

Responsibilities/Accountabilities

Senior Management Team Members, Senior Directors, Directors and Supervisors are responsible to:

- immediately advise the Vice President of Human Resources and Support Services of a report of suspected improper/unethical behaviour or activity,
- promote an environment and culture of openness and honesty,
- communicate to staff, volunteers, Board members and affiliated individuals this policy,
- assist, when requested, the individual(s) designated to investigate a report of suspected improper/unethical behaviour or activity,
- maintain the confidentiality of the individual(s) involved in the investigation,
- ensure report of suspected improper/unethical behaviour or activity is investigated in a timely manner and where appropriate, action taken to correct the situation,
- protect from threats or acts of reprisal the individual(s) who disclose in good faith improper/unethical behaviour or activity.

Staff, volunteers and Board members are responsible to:

- use hospital resources and information responsibly and in good faith,
- follow the internal processes established to report in good faith, suspected improper/unethical behaviour or activity,
- respect the reputation of individuals by not making trivial, vexatious or bad faith allegations of improper/unethical behaviour or activity,
- assist in the promotion of an environment and culture of openness and honesty,
- assist, when requested, the individual(s) designated to investigate a report of suspected improper/unethical behaviour or activity,

POLICY AND PROCESS: Reporting of Improper/Unethical Behaviours or Activities (Whistleblowing)

- maintain the confidentiality of the individual(s) involved in the investigation.

Process

- Any staff, volunteer, Board member or affiliated individual reporting an alleged improper/unethical behaviour or activity should contact her/his immediate leader who in turn will make known the report to the Vice President of Human Resources and Support Services.
- Where staff, volunteer, Board member or affiliated individual is not satisfied with his/her leader or is uncomfortable for any reason addressing such concerns to her/his leader, the staff member, volunteer, Board member or affiliated individual may directly contact the Vice President of Human Resources and Support Services. If staff, volunteer, Board member or affiliated individual is uncomfortable for any reason contacting the Vice President of Human Resources and Support Services, the President and Chief Executive Officer (CEO) may be directly contacted.
- Any member of the Professional staff may choose to contact the Chief of Staff who in turn will make known the report to the Vice President of Human Resources and Support Services.
- If there is concern about reporting to a staff member at the Hospital, an alternative action is for the individual to report her/his concern to the Chair of the Audit Committee of the Board who will ensure that an appropriate investigation occurs. The Chair of the Audit Committee can be directly contacted through the CEO's office. For privacy purposes, if email is used please do not include any patient information in any email correspondence.
- Individuals making a report are encouraged to provide in writing as much specific information as possible including names, dates, places, and events that took place. Such reports should be factual rather than speculative to allow for proper assessment of the nature, extent, and urgency of the report. Anonymous communications will be accepted but may limit the ability of the Hospital to follow up on the allegations.
- The Vice President of Human Resources and Support Services, the President and Chief Executive Officer (CEO) and the Chair of the Audit Committee are accountable for investigating and responding to reported concerns about improper/unethical behaviour and activity as outlined on the attached flowchart. The accountability includes ensuring that:
 - reported allegations are addressed and concluded in a timely and appropriate manner,
 - the interests of any individual coming forward with an allegation are protected as outlined in this policy,
 - the appropriate Hospital officials are involved in investigating and addressing the outcome of investigations,

POLICY AND PROCESS: Reporting of Improper/Unethical Behaviours or Activities (Whistleblowing)

- if necessary, the appropriate government or law enforcement agencies are informed,
- an individual(s) directly involved with a reported allegation is appropriately informed of the outcome.
- Staff, volunteers, Board members and affiliated individuals who have raised an issue and who have concerns with respect to the outcome of any investigation, should raise the matter in writing to the Chair of the Board of Directors.
- While the Hospital trusts this policy gives individuals the reassurance needed to raise such matters informally, it recognizes there may be circumstances where an individual should properly report matters to outside bodies such as government authorities or the police.

Cross References

Respectful Workplace Environment Policy
Privacy of Personal Information Policy

Key Words

Whistleblowing

