

## BC Games Society

### Whistleblower Policy

#### **BACKGROUND**

As a long-standing entity, with deep roots in the communities of BC, the BC Games Society has earned the confidence of British Columbians as an organization with great integrity and honesty. The BC Games Society wishes our organization to remain in an affirmative light, and to help ensure our profile remains positive, we have created a *Whistleblower Policy* to deal with issues and concerns not typically covered by existing policy or practice. Typically, these actions would be unethical or unlawful and may include:

- unauthorized use of BC Games Society funds or assets
- possible fraud or corruption
- threats to employee or volunteer or participant safety
- any other unethical, improper, or suspicious conduct or abuse

If you have a serious concern that there is a misuse of society resources, or you see situations of fraud or theft, inappropriate behavior by fellow employees, or volunteers, or a situation is being created that poses a health or physical risk to you or your fellow employees, you should feel *safe* in reporting the matter to the appropriate people at the BC Games Society. Indeed, employees should feel it is their duty to the society and their fellow employees to do so.

#### **POLICY**

##### **1.0 OVERVIEW**

With the expectation of the public that the BC Games Society's assets are being appropriately managed, and that staff are conducting themselves in a professional manner, the BC Games Society Audit Committee has introduced a new policy pertaining to unethical or fraudulent activities within the society.

- 1.1 Employees are often the first to realize that there may be something seriously wrong within the society. The staff members, however, may not be willing to express their concerns if they feel that doing so would be disloyal to their fellow staff members or the management team. They may fear potential harassment or victimization. Often it may be easier to ignore the concern rather than report it.
- 1.2 Suppliers and contractors may also become aware of circumstances, which indicate questionable practices are occurring.
- 1.3 The BC Games Society is dedicated to the highest possible standards of honesty, integrity, and accountability. In line with that commitment it is expected society employees and others we deal with who have serious concerns about any aspects of the society's practices will voice those concerns.

1.4 The BC Games Society believes that one of the strongest deterrents of malpractice and wrongdoings is the probability that such acts will be reported and investigated thoroughly, that those responsible will be punished and the matter will be promptly resolved.

1.5 The BC Games Society intends this policy as a clear message that concerns about potentially fraudulent or unethical practices can be raised without fear of victimization, subsequent discrimination or disadvantage. The society encourages and strives to enable staff to raise serious concerns within the society rather than overlooking a problem or seeking resolution outside of the society. A culture of openness is promoted within the BC Games Society.

1.6 This policy applies to all employees, contractors or consultants working for the BC Games Society and suppliers providing services under contract to the BC Games Society.

## **2.0 AIMS AND SCOPE OF THE COMPLAINT POLICY**

2.1 The goals of the Complaint Policy are to:

Encourage staff and others to raise serious concerns they may have:

- Provide a variety of avenues to raise those concerns;
- Provide a response to the person who raised the concern on the actions taken or the result of any investigation;
- Ensure the person is aware of how to pursue their concerns further should they not be satisfied with the response provided;
- Reassure any person voicing a concern or contemplating voicing a concern that they will be protected from possible victimization if they have a reasonable belief that they acted in good faith.

2.2 This policy statement covers any malpractice or wrongdoing by:

- Any employee, contract employee or consultant of the BC Games Society;
- Any member of the BC Games Society Board of Directors;

2.3 This policy is intended to cover serious concerns that fall outside the scope of other society policies and procedures. These include:

- unauthorized use of BC Games Society funds or assets
- possible fraud or corruption
- threats to employee, contractor, supplier health or safety in association with society activities or premises
- any other unethical, improper or suspicious conduct or abuse

There are existing procedures in place to enable employees to lodge a concern relating to their own employment.

### **3.0 SAFEGUARDS FOR EMPLOYEES**

- 3.1 The BC Games Society is committed to ethical practice and high standards and is supportive of its employees.
- 3.2 The BC Games Society understands that the decision to report a concern is a difficult one to make. For an employee telling the truth, there is nothing to fear, as they would be fulfilling their duty to the society.
- 3.3 The BC Games Society will not tolerate harassment, victimization, or even informal pressure by anyone within the society on an employee. Such conduct will be subject to serious disciplinary action up to and including dismissal. The society will take the necessary action to protect any employee who has reasonable grounds for believing the wrongdoing has or may occur.

### **4.0 CONFIDENTIALITY**

- 4.1 All concerns brought to the BC Games Society attention will be regarded as confidential. The employee's identity would only need to be revealed at the appropriate time if they are required to be a witness. Advice on this procedure would be provided at the appropriate time.

### **5.0 FALSE AND MALICIOUS ALLEGATIONS**

- 5.1 The BC Games Society will view very seriously any false or malicious allegations that it receives. The making of any false or malicious allegations by any employee of the society will be regarded as a serious disciplinary offence.

### **6.0 RAISING A CONCERN**

- 6.1 All concerns should be raised to the Audit Committee Chair

Audit Committee Chair  
BC Games Society  
c/o KPMG LLP Chartered Accountants  
800 – 730 View Street  
Victoria BC V8W 3Y7  
Mark your mail envelope "Private & Confidential"  
Telephone: 250.480.3515  
Alternatively, email: [rdecksheimer@kpmg.ca](mailto:rdecksheimer@kpmg.ca)

- 6.2 The Audit Committee Chair will initially determine whether the complaint is covered under any other policy (i.e. Harassment Policy, Employee Code of Conduct, Conflict of Interest, Confidentiality, etc.). If so, you may be asked to follow the appropriate procedures under that policy.
- 6.3 The Audit Committee Chair does not report to the President and CEO on these matters, but rather reports directly to the Board of Directors.

- 6.4 The Audit Committee Chair will provide a list of all complaints to the Board of Directors on a quarterly basis.
- 6.5 The Audit Committee Chair will investigate the concern and will report to the Board of Directors if warranted.
- 6.6 All concerns brought forward to the Board of Directors will be regarded as strictly confidential.
- 6.7 The Audit Committee Chair will notify the complainant with the results of their investigation.
- 6.8 If the employee is not satisfied with the action taken on a concern, and feels it is necessary to go further, the employee should contact the Co- Chair of the Board of Directors by e-mail at [flento@telus.net](mailto:flento@telus.net) or by telephone at 250.423.7607.

## **7.0 RESPONSIBILITY FOR THIS POLICY**

- 7.1 The Audit Committee of the BC Games Society is ultimately responsible for the maintenance and operation of this policy and will maintain a record of concerns raised and outcomes of investigations. Any concerns raised in confidence will be documented to preserve that confidential relationship. The Audit Committee Chair will report directly to the Board of Directors for the purposes of this policy.

**DATE:** May 8, 2008