

# Whistleblower Policy

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## **Policy Statement**

The College of Dental Hygienists of Ontario (CDHO) is committed to high ethical standards. Employees and representatives of CDHO are expected to conduct themselves with honesty and integrity in fulfilling their responsibilities and to comply with all applicable laws and regulations. CDHO encourages employees, Council members and/or stakeholders to raise concerns they have in regard to the subjects identified as Reportable Matters covered by this Policy. When raising such a concern in good faith, an employee, Council member and/or stakeholder takes on the role of “Whistleblower”. CDHO assures that a Whistleblower will be protected from harassment or victimization to the greatest extent possible.

The **Whistleblower Policy** covers instances where an employee, Council member and/or other stakeholder has evidence of and reports a concern about any CDHO staff, Council member, Non-Council member and/or retained consultant (including external auditors) that involves one or more of the following Reportable Matters:

- Accounting, auditing or other financial reporting misconduct or fraud;
- Receiving gifts from vendors which could create a bias or a conflict of interest (perceived or actual);
- Unethical conduct in violation of CDHO policy;
- Disclosure of confidential CDHO information;
- Violations of federal and/or provincial laws that could result in fines or civil damages payable by CDHO, or that could otherwise harm CDHO’s reputation; or
- Danger to the health and safety of employees, Council members, stakeholders and the general public.

Reporting by a Whistleblower that is not made in good faith will be considered a serious offence and the individual will be subject to discipline up to and including termination for cause in the case of employees, and severing the relationship, in the case of others.

## **Purpose**

To encourage employees, Council members, and stakeholders to make a formal statement or report to CDHO about Reportable Matters.

## **Procedure**

A Whistleblower may submit their report in writing to the Registrar/CEO or Deputy Registrar by completing a **Whistleblower Incident Form**. This form can be emailed, mailed or hand-delivered.

A Whistleblower may wish to remain anonymous. CDHO will treat all reports received from Whistleblowers in confidence to the greatest extent possible. In all cases, the person who is alleged to have committed the Reportable Matter(s) will be made aware of the incident at the appropriate point in the investigation.

Whether a Whistleblower chooses to remain anonymous or not, they should give as much detailed information in their report as possible. Information that should be included:

- Where and when the Reportable Matter(s) occurred;
- Name(s) and title(s) of all individuals involved;
- How and when the Whistleblower became aware of the Reportable Matter(s);
- All relevant details that will assist in a complete and thorough investigation.

Upon receipt of a report about a Reportable Matter, one of the following processes shall occur:

#### ***Reportable Matters Involving Staff, Agents of the College or Vendors***

The Registrar/CEO or Deputy Registrar shall be responsible for promptly conducting an investigation and for resolving most types of reports made under this Policy. In certain circumstances, the Registrar/CEO or Deputy Registrar may refer the investigation of the matter to an employee or a third party depending upon the nature of the Reportable Matter. Under no circumstances will a matter be investigated by an employee of CDHO who is involved in the Reportable Matter.

At the conclusion of each investigation, all related documentation will be maintained for safekeeping in a confidential manner by Human Resources.

#### ***Reportable Matters Involving Council Members and Non-Council Committee Members***

The Registrar/CEO or Deputy Registrar shall be responsible for promptly bringing the reportable matter to the President and or the Vice-President who will take actions described in the College's Bylaw No. 5.

#### **Questions relating to the Whistleblower Policy should be directed to:**

Lisa Taylor  
Registrar/CEO  
College of Dental Hygienists of Ontario  
69 Bloor Street East, Suite 300  
Toronto, ON M4W 1A9

Tel: 416 961-6234, ext. 239

Email: [Registrar@cdho.org](mailto:Registrar@cdho.org)

Jane Keir  
Deputy Registrar  
College of Dental Hygienists of Ontario  
69 Bloor Street East, Suite 300  
Toronto, ON M4W 1A9

Tel: 416 961-6234, ext. 235

Email: [DeputyRegistrar@cdho.org](mailto:DeputyRegistrar@cdho.org)

***August 2016***

# Whistleblower Incident Form

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**Name** (optional – you may submit your report by sending it to the Registrar/CEO or Deputy Registrar and labeling it personal and confidential. Reports may also be received by the Registrar/CEO or Deputy Registrar by phone.)

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**Telephone** (optional) \_\_\_\_\_ **E-Mail** (optional) \_\_\_\_\_

CDHO will treat all reports by Whistleblowers as confidential to the extent that is consistent with conducting a full and fair investigation. If you make a report under this Policy and disclose your identity, CDHO will keep your identity confidential until an investigation has begun. Your identity will be disclosed to other individuals only to the extent necessary to conduct a complete, full and fair investigation.

**Describe the incident:**

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**Where and when did the incident occur?**

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**Individual(s) suspected involvement in the Reportable Matter(s):**

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**How did you become aware of the Reportable Matter(s)?**

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**Date you became aware of the Reportable Matter(s):** \_\_\_\_\_  
(mm/dd/yyyy)

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**Office Use:**

Date Whistleblower incident was formally submitted: \_\_\_\_\_  
(mm/dd/yyyy)

Name of Investigator: \_\_\_\_\_