

LOFT Community Services - Whistleblower Policy for Board and Staff

Intent

LOFT Community Services is committed to ensuring the organization acts in accordance with applicable laws and observes the highest standards of business and personal ethics in conducting its responsibilities. This policy sets out the duty of all Board members and staff to report information relating to illegal or unethical practices, violations of LOFT policies, or financial misconduct or suspected misconduct, including fraud and financial impropriety, and ensures that anyone who makes a report in good faith will be protected from retaliation.

Policy

Duty to Report

It is the duty of all Board members and staff to report concerns about illegal or unethical practices, violations of LOFT policies, or financial misconduct or suspected misconduct, including fraud and financial impropriety to the LOFT Compliance Officer. This includes but is not limited to:

- Breach of legal obligations, rules, regulations or policy
- Endangerment of health and safety
- Gross mismanagement or omission or neglect of duty
- Abuse of authority
- Providing false or misleading information, or withholding material information on LOFT financial statements, tax returns or other public documents.
- Misappropriation or misuse of LOFT resources such as funds or assets.
- Unauthorized alteration or manipulation of electronic records.
- Pursuit of material benefit or self-advantage in violation of LOFT's Conflict of Interest Policies.
- Concealment of any of the above or any other breach of this policy

The proper investigation of a report may require that additional facts and information be obtained from the complainant to substantiate the allegations and confirm good faith. Therefore, LOFT does not accept anonymous misconduct reports.

Acting in Good Faith

Anyone filing a complaint alleging misconduct must act in good faith and have reasonable grounds for believing the information disclosed indicates wrongdoing. Making allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false could result in disciplinary action up to and including termination

No Retaliation

No Board member or staff member who makes a report in good faith shall suffer retaliation. Retaliation means any direct or indirect detrimental action threatened or taken against an individual. Anyone who is found to have retaliated against someone who has made a report in good faith will be subject to disciplinary action up to and including termination.

Procedures

Compliance Officer

LOFT's Compliance Officer for the purpose of this policy is the Senior Director, Administration and Transformation & Privacy Officer. The Compliance Officer is responsible for investigating and resolving all reported complaints and allegations under this policy and is required to report to the CEO on all complaints of misconduct and retaliation. If, due to the nature of the complaint, the CEO is not the appropriate person to receive the report, the Compliance Officer will report to the Board Chair.

Individuals who are not comfortable making their report to the Compliance Officer may contact the Senior Director, People and Culture to report their concern or send the information anonymously by mail.

Contact Detail

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| Compliance Officer | hsechter@loftcs.org |
| Senior Director, People and Culture | abaraka-clarke@loftcs.org |
| CEO | hmcdonald@loftcs.org |
| Board Chair | james.anok@protonmail.ch |

Reporting of Misconduct

A report of misconduct or suspected misconduct is to be made in writing or by email to the LOFT Compliance Officer.

Some useful detail to include:

- Date, time and location
- Names of person(s) involved
- The general nature of your concern
- How you became aware of the issues
- Possible witnesses
- Other information that you have to support your report

The Compliance Officer will report all suspected misconducts to the CEO and will respond to the complainant within 10 business days to acknowledge receipt of the report of misconduct. The Compliance Officer will protect the identity of the complainant and safeguard the confidentiality of any such report, and information will be shared only on a need-to-know basis.

All reports will be investigated within 30 business days unless there are extenuating circumstances. Appropriate action will be taken at the completion of the investigation. The Board of Directors will be informed of all such complaints and their disposition.

Reporting of Retaliation

Individuals who believe that retaliatory action has been taken against them because they have reported misconduct should make a report in writing to the Compliance Officer, forwarding all information and documentation to support their allegation of retaliation. Reports of retaliation will be kept confidential to the extent possible consistent with the need to conduct an adequate investigation.

The Compliance Officer will inform the CEO of any report of retaliation and conduct an investigation within 30 business days of receiving the report.

If the result of the investigation indicates there is a credible case of retaliation or threat of retaliation, the Compliance Officer will refer the findings to the CEO and recommend measures to safeguard the interests of the complainant. The complainant will be informed of the outcome in writing.

The Compliance Officer may also recommend disciplinary actions to be taken against the retaliator. The CEO will make the final decision on the appropriate action to be taken.

If the investigation reveals no credible case of retaliation or threat of retaliation, the complainant will be advised of other mechanisms on conflict resolution.

Appeal Process

If the complainant is not satisfied with the findings of the Compliance Officer, she/he may make a direct appeal to the CEO within 20 business days of receipt of the written report. Ruling from the CEO will constitute the final disposition of the complaint.