



Title: Whistleblower Policy	Policy Area: Financial and Operations
Effective Date: June 16, 2015 (Updated January 2019)	Approved by: Board of Trustees
<p>1. Background and Purpose:</p> <p><u>Background:</u> St. Paul Bloor Street (SPBS) requires staff and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. They must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws, regulations and Diocesan and Parish policies and guidelines.</p> <p>SPBS' reputation for honesty and integrity is reflected in the way it conducts business and in the integrity of its financial reporting. Staff and anyone in the role of a volunteer must conduct themselves in a manner that reflects favourably on SPBS. It is the responsibility of all staff, volunteers and suppliers to report concerns or violations about ethical and honest behaviour related to SPBS financial or operational matters.</p> <p><u>Purpose:</u> This Whistleblower Policy and Procedures is intended to encourage and enable current and former staff, suppliers, parishioners and volunteers to raise serious concerns about violations of ethical and honest behaviour at SPBS so that SPBS can address and correct inappropriate conduct and actions. This policy provides a means of reporting complaints and allegations regarding relevant violations and potential wrongdoings to an independent third party. For purposes of the policy, the definition of violations of ethical and honest behaviour includes but is not limited to:</p> <ul style="list-style-type: none"> • Possible errors, omissions or fraud relating to financial matters; • Theft, improper use, or misappropriation of SPBS assets and resources through fraudulent or dishonest conduct; • Inappropriate actions and relationships that could reduce effectiveness of internal controls; • Illegal, unethical or questionable practices that adversely or may adversely affect SPBS financial assets. <p>2. Scope:</p> <p>This Policy applies to all trustees, ministry staff, employees, volunteers of SPBS and is a supplement to the Trustees' Code of Conduct and the Standards of Conduct set out for staff. Each individual attests to their adherence to the Policy as part of the annual acknowledgement of adherence to their respective Code of Conduct. This includes the responsibility to report concerns and the protection against retaliation for reports made in good faith.</p> <p>SPBS has established a confidential process by which persons can report any complaint or concern regarding questionable accounting or financial matters relating to SPBS. Additionally, any violations of laws, regulations, SPBS policies, or the relevant Code and/or Standards of Conduct can be reported using the same process.</p>	



NOTE: This Policy is not intended to replace either the Anglican Diocese of Toronto's [Sexual Misconduct Policy](#) or the SPBS Policies regarding *Workplace Violence and Harassment* (available on request from the SPBS office).

3. Policy Statement:

SPBS desires that any person with a financial and/or operational complaint or concern relating to SPBS has a confidential process by which they may report any such complaint or concern using the procedures set out below.

Acting in Good Faith

Anyone filing a financial and/or operational complaint or concern must be acting in good faith and have reasonable grounds before reporting such complaint or concern.

No Retaliation

No whistleblower, who in good faith reports a financial and/or operational complaint or concern, shall suffer harassment, retaliation or adverse employment consequence (if applicable). A staff member or volunteer who retaliates against someone, who has reported such a complaint or concern in good faith, is subject to discipline up to and including termination of employment or removal from one's volunteer position, respectively.

Confidentiality

Financial and/or operational complaints or concerns may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of complaints or concerns will be kept confidential to the extent practicable, consistent with the need to conduct an adequate investigation.

4. Reporting Procedures:

SPBS suggests that staff share their questions, concerns, suggestions or complaints with their supervisor as a first step when such concerns arise. If you are uncomfortable with the specific situation or not satisfied with the response from your supervisor, you are encouraged to speak directly to the Executive Director, alternatively the Rector. Supervisors are required to promptly report complaints or concerns about suspected ethical and legal violations in writing to the Executive Director, who has the responsibility to investigate all reported complaints. Staff with concerns or complaints may also submit their complaints or concerns using the steps outlined below.

Submitting of the Financial and/or Operational Complaint or Concern

Submit the complaint or concern to any of the following:

- Any of the SPBS Trustees, as listed on the [SPBS website](#), of St. Paul's Bloor Street, Attention: [Trustee's Name], 227 Bloor St. East, Toronto, M4W 1C8
- Chair of the Audit and Finance Committee of St. Paul's Bloor Street, Attention: Chair of the Audit and Finance Committee, 227 Bloor St. East, Toronto, M4W 1C8
- The Executive Director at the Diocese of Toronto as listed on the [Diocesan website](#)



The greater the level of detail provided in the complaint/concern, the more expeditiously it can be investigated. The submission should include as much detail as possible including a detailed description of the activity for which the complaint/concern is about. If known, include information regarding the date(s) and location(s) of such activity. Indicate whether you wish to be contacted to acknowledge receipt and if so, provide contact information. Alternatively, indicate whether you wish to remain anonymous.

Reporting of the Financial and/or Operational Complaint or Concern

The recipient of the complaint/concern will acknowledge receipt, if contact information is provided, unless the sender requests otherwise. The recipient is responsible for maintaining the anonymity of the sender if the sender requests to remain anonymous. The recipient will report immediately to the Board of Trustees that a complaint/concern has been received.

Treatment of the Financial and/or Operational Complaint or Concern submissions

The Board of Trustees, based on advice received from the recipient of the complaint/concern will investigate the complaint/concern as soon as possible and will take appropriate action. Whenever possible, the resolution of the investigation will be communicated to the individual who submitted the concern.