Whistleblower Policy

Policy #:	E-3 / FE-3
Policy Category:	Ethics
Approved by:	School and Foundation Boards of Directors
Date Approved:	April 22, 2022, May 2025 Revised
Next Review:	2027/28

Introduction

Lakefield College School (the "School") and the Lakefield College School Foundation (the "Foundation") are committed to providing students with quality learning opportunities in a safe and caring environment characterized by behavior consistent with the values for which our community stands.

This policy supports that commitment by providing a framework that encourages individuals to report any wrongdoing (as defined herein) by Directors, the Head of School and Foundation, Leadership Team members, faculty and other employees, contractors, volunteers, donors, parents, students and other persons involved with the School and/or Foundation (collectively, "Community Members") without fear of reprisal.

This policy is intended to encourage Community Members to demonstrate integrity in all of their dealings with other individuals within the community and to uphold the trust placed in them by individuals who are part of the LCS Community. Any report of wrongdoing will be investigated in accordance with this policy.

All individuals making a report of wrongdoing are expected to adhere to the procedures outlined in this policy. At all times, this policy should be interpreted to be consistent

with the School's and Foundation's policies, the School Life Guide and with the Ontario Human Rights Code.
A copy of this policy will be available on the School and Foundation website. All employees will receive an electronic copy and a copy of the policy will be included in the Operations Manual.

Purpose of Policy

The purpose of this policy is as follows:

- to encourage individuals to report wrongdoing by any Community Members
- to ensure there is no reprisal against any individual or employee who makes a report in good faith under this policy, and
- to the maximum extent possible, to protect the confidentiality of those making reports

Policy

Standards

The School and Foundation maintain high standards of moral and ethical conduct, as expressed in their values, policies and in the School Life Guide. Community Members must observe high standards of professional ethics and integrity in the conduct of their duties and responsibilities and comply with all applicable laws, regulations, School and Foundation policies as well as the School Life Guide, as appropriate.

The School and Foundation are committed to protecting students, staff, revenue, property, the endowment, proprietary information and other assets.

The School and Foundation will not tolerate any misuse or misappropriation of their respective assets.

The School and Foundation will make reasonable efforts to protect themselves against wrongdoing by Community Members and will establish and maintain procedures to

ensure, to the fullest extent reasonably possible, the prevention and detection of wrongdoing.

Application

All Community Members are expected to observe the standards set out above while fulfilling their responsibilities to the School and/or Foundation, as the case may be, and to not commit any wrongdoing. This policy applies to any activities in connection with or on behalf of the School or Foundation, whether on or off campus, including but not limited to travel and social functions.

Scope

For the purposes of this policy, "wrongdoing" is used to refer collectively to illegal or inappropriate conduct. Wrongdoing includes but is not limited to:

- Fraud as defined in the Criminal Code of Canada (s. 380 (1))
- Misappropriation of funds, supplies, resources or other assets
- Any computer-related activity involving the alteration, destruction, forgery, manipulation of data or unauthorized access for wrongdoing purposes, in violation of the School or Foundation policies for use of information technology resources
- Irregular and/or improper accounting, internal controls, or auditing practices or conduct
- Conflicts of interest (personal or otherwise) influencing the objectives and decision-making of one's duties
- An actual or suspected violation or contravention of any federal or provincial law, regulation or administrative procedures as it relates to the School or Foundation
- Conduct or practices that present a danger to the health, safety or wellbeing of students, employees or other parties, where applicable
- Unprofessional conduct or conduct that contravenes School or Foundation policies, and
- Knowingly directing or counseling a person to commit a wrongdoing of illegal or inappropriate conduct

The above list is not exhaustive but is intended to provide guidance to individuals as to the kind of conduct which constitutes wrongdoing under this policy. Individuals who are in doubt as to whether a concern constitutes wrongdoing should contact their immediate supervisor prior to reporting.

Reporting Responsibility

Any individual who is aware of or suspects wrongdoing by a Community Member has the right and obligation to report the occurrence as soon as possible and in accordance with this policy.

No Reprisal

This policy prohibits reprisals or threats of reprisals against individuals acting in good faith who:

- report incidents of suspected wrongdoing
- seek advice about making a report
- cooperate in any subsequent investigation
- act as witnesses in any subsequent investigation, or
- act in compliance with this policy

For the sake of clarity, a reprisal is any measure taken against an individual that results in intimidation, coercion or harassment or adversely affects their employment or appointment and includes, but is not limited to:

- ending or threatening to end an individual's employment or appointment
- disciplining or suspending or threatening to discipline or suspend an individual
- imposing or threatening to impose a penalty related to employment or appointment of an individual, or
- intimidating, coercing or harassing an individual in relation to their employment or appointment

A person who has reasonable grounds for believing they have suffered a reprisal is entitled to make a complaint.

A Community Member who retaliates against an individual who has reported wrongdoing in good faith is subject to discipline, up to and including termination of employment, volunteer roles or vendor/contractor services.

Acting in Good Faith

In making a report against a Community Member, an individual must be acting in good faith with reasonable grounds for believing that there is wrongdoing.

An individual who makes an unsubstantiated report, which is knowingly false or made with vexatious or malicious intent, will be subject to discipline, including termination of employment, volunteer roles or vendor/contractor services.

Confidentiality

The School and Foundation will accept reports under this policy on a confidential or anonymous basis.

To the maximum extent possible, the identity of the individual reporting wrongdoing on a confidential basis shall remain confidential (but not anonymous) to those persons directly involved in applying this policy and the Community Member involved, unless the issue requires investigation by law enforcement.

The School and Foundation will not tolerate any attempt by a Community Member to identify an individual who reports in good faith on a confidential or anonymous basis in accordance with this policy.

Procedures

Provided there are reasonable grounds, the School and/or Foundation, as the case may be, shall investigate any and all incidents of suspected or alleged acts of wrongdoings and reprisal. An objective and impartial investigation will be conducted regardless of the

position, title, length of service or relationship of any Community Member who becomes the subject of such investigation.
When a wrongdoing or reprisal is confirmed by the investigation, appropriate disciplinary action shall be taken, up to and including termination of employment, volunteer roles and/or contract where appropriate.

In the event of criminal misconduct, the police shall be notified immediately.

Reporting a Wrongdoing
Any act of wrongdoing or reprisal that is detected or suspected by an individual who is an employee should be reported immediately to an immediate supervisor. Where the immediate supervisor is suspected of wrongdoing, the employee should notify the Head of School and Foundation.

Any act of wrongdoing or reprisal that is detected or suspected by an individual who is not an employee should be reported immediately to the Head of School and Foundation.

Where the Head of School and Foundation is suspected of wrongdoing or reprisal, the individual should notify the Chairs of the School and Foundation Boards.

Where a School or Foundation board member is suspected of wrongdoing or reprisal, the individual should notify the Chair of the School or Foundation Board, as the case may be. Where the Chair of the School or Foundation Board is suspected of wrongdoing or reprisal, the individual should notify the Vice Chair of the School or Foundation Board, as the case may be, or in the absence of an appointed Vice Chair, the individual should notify the Chair of the School or Foundation Governance Committee, as the case may be.

Investigation of Suspicions or Allegations of Wrongdoing
Responsibility for ensuring all reported allegations of wrongdoing and reprisal are investigated rests with the Head of School and Foundation unless the allegations of wrongdoing are against the Head of School and Foundation or a board member, in

which case the responsibility rests with the Chair of the School and/or Foundation Board, as the case may be.
The Head of School and Foundation, or the Chair of the School and/or Foundation Board as applicable, shall ensure that all instances of alleged or suspected wrongdoing and reprisal shall be appropriately investigated in a timely and procedurally fair manner and reported to the School and/or Foundation Board of Directors as outlined below.

The Head of School and Foundation, in consultation with the Chair of the School and/or Foundation Board, as the case may be, shall determine when it is appropriate to inform the School and/or Foundation Board of Directors, as the case may be, of an allegation of wrongdoing or reprisal or the results of an investigation of wrongdoing or reprisal. Where the Head of School and Foundation or a board member is suspected of wrongdoing or reprisal, the Chair of the School and/or Foundation Boards, as the case may be, shall determine when it is appropriate to inform the School and/or Foundation Board of Directors. In addition, the Head of School and Foundation, or the Chair of the School and/or Foundation Board as applicable, may inform the Chair of the School and/or Foundation Finance Committee if it is a financial wrongdoing.

The Head of School and Foundation, or the Chair of the School and/or Foundation Board as applicable, in consultation with the School and/or Foundation's external auditors and/or legal counsel, may involve the services of internal staff and/or external resources as appropriate.

Employees are expected to fully cooperate with their supervisors and any others involved in the investigation and make all reasonable efforts to be available to assist during the course of the investigation.

If the investigation that was done in good faith is not to the satisfaction of the individual who reported the wrongdoing or reprisal, then they have the right to report the event to the appropriate legal or investigative agency.

All participants in an investigation of wrongdoing or reprisal, including persons who make a report, witnesses and the persons alleged to be responsible for wrongdoing or reprisal, shall keep the details and results of the investigation confidential, and shall not discuss the matter with anyone other than those performing the investigation.

The School and Foundation may develop procedures to protect the identities of all participants in an investigation of wrongdoing or reprisal, including persons who make a report, witnesses, and the persons alleged to be responsible for wrongdoing.

Prohibition Against Interfering with an Investigation
No person shall willfully obstruct anyone involved in an investigation of wrongdoing or reprisal.

Any person who willfully obstructs anyone involved in an investigation of wrongdoing or reprisal is subject to disciplinary measures, including suspension or dismissal.

No person shall destroy, alter, falsify, or conceal a document or other thing they know or ought to know is likely relevant to an investigation of wrongdoing or reprisal.

Any person who destroys, alters, falsifies or conceals a document or other thing they know or ought to know is likely relevant to the investigation of wrongdoing or reprisal is subject to disciplinary measures, including suspension or dismissal.

Prohibition Against Counseling Interference with an Investigation

No person shall direct, counsel or cause in any manner any person to obstruct anyone involved in an investigation of wrongdoing or reprisal.

No person shall direct, counsel or cause in any manner any person to destroy, alter, falsify, or conceal a document or other thing they know or ought to know is likely relevant to an investigation of wrongdoing or reprisal.

Any person who directs, counsels or causes in any manner any person to obstruct anyone involved in an investigation of wrongdoing is subject to disciplinary measures, including suspension or dismissal.

Any person who directs, counsels or causes in any manner any person to destroy, alter, falsify, or conceal a document or other thing they know or ought to know is likely relevant to an investigation is subject to disciplinary measures, including suspension or dismissal.

Accountability

The Head of School and Foundation has responsibility for monitoring and ensuring compliance with this policy except when the alleged wrongdoing involves the Head of School and Foundation or a board member, in which case the Chair of the School and/or Foundation Boards have responsibility, as the case may be.

Policy Review

This policy will be reviewed by the Governance Committees of the School and Foundation every three (3) years and recommendations for amendments will be brought to the Boards of the School and Foundation for review and approval.