

Section:	Employment	Date of Issue:	June 1, 2022
Title:	Human Resources Policy Manual	Revised:	July 29, 2025
Subject:	Protected Disclosure (Whistleblower)	File No:	H350-1
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Approved By:	Senior Leadership Committee		

Purpose

Integral to GEF Seniors Housing's Mission: "as Alberta's largest non-profit social housing operator for seniors, we focus on providing affordable, well-maintained, and secure buildings, where our clients can live with dignity and thrive in their communities with the support of friendly and caring staff and volunteers"; and its Vision: "to create vibrant, affordable communities for seniors", is our commitment to receive and respond to reported incidents of suspected or actual criminal or unethical conduct by or involving GEF Seniors Housing, submitted in good faith, by current or former employees, volunteers and Board members.

This policy has been developed to describe the responsibilities of everyone involved in reporting criminal or unethical concerns at GEF Seniors Housing and outlines how the organization will engage in providing clear reporting mechanisms, ensuring confidentiality where deemed appropriate, and protecting whistleblowers from retaliation to ensure the integrity of the organization, a safe working environment, and compliance with any relevant legislative requirements.

Policy

In support of GEF Seniors Housing's Mission, Vision, and Values and our commitment to the promotion and development of a culture of ethical conduct, transparency, and accountability. GEF Seniors Housing (hereafter referred to as "GEF") is committed to the highest standards of honesty and integrity in all of its activities. GEF requires all employees, volunteers, and Board members to act honestly, ethically, and with integrity and to safeguard the residents, tenants and facilities for which they are responsible.

At any time, if this commitment to honesty and integrity is not followed or appears in doubt, GEF will seek to identify and remedy such situations. Accordingly, when an individual has reasonable grounds to believe that an employee, volunteer, or member of the Board of Directors (the "Board") has committed, or is about to commit, an act that is illegal or unethical they can make a report, creating a Whistleblower Event. When there is a Whistleblowing Event (as defined below), GEF will ensure that:

- The current or former employee, volunteer, or Board member understands where and how to disclose this information;
- The complainant is protected from reprisals if the report is made in good faith;
- All parties connected to an investigation are treated fairly and equitably;
- Confidentiality is maintained where appropriate; and
- If wrongdoing is found, appropriate action(s) is taken.

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Whistleblowing Event

For the purposes of this policy and procedure, a Whistleblowing Event includes any of the following incidents:

- (a) Accounting, auditing, or other financial reporting that reveals fraud or misrepresentation;
- (b) Violations of Federal or Provincial laws that could result in fines or civil damages payable by GEF, or which could significantly harm GEF's reputation or public image;
- (c) Unethical business conduct in violation of any GEF policies; or
- (d) Serious danger to the health, safety, or well-being of tenants, employees, volunteers, and/or the general public.

Submission of a Whistleblower Event

Anyone may submit a complaint in writing where they reasonably believe a Whistleblower Event has occurred.

- (a) If the complaint involves any individual other than the CEO, it should be submitted to the Chief Executive Officer (CEO).
- (b) If the complaint is against the CEO, it must be submitted directly to the Chair of the Board or the Vice Chair of the Board.

Officers

The Officer responsible for receiving and handling whistleblowing complaints is the CEO, except in cases involving the CEO, which are handled by the Chair or Vice Chair of the Board. Depending on the details related to the reported Whistleblowing Event, the CEO (or Chair/Vice Chair in CEO-related cases) may involve the following officers:

- (a) Chair of the Board
- (b) Chair of the Board's Audit Committee

This policy will be made available on GEF Connect and on GEF's website.

For complaints regarding dissatisfaction, concerns, or frustrations about employment processes, policies, procedures, or conduct of co-workers, refer to Human Resources Policy 5.02 - Dispute Resolution.

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For the reporting of workplace violence and harassment, refer to Human Resources Policy 5.03 - Workplace Violence and Harassment Prevention Plan.

For the reporting and investigating of occupational accidents, injuries, illnesses, and near misses, refer to Human Resources Policy - 7.10 Incident Reporting and Investigation.

1 Officers, including the CEO, the Chair of the Board, Vice Chair of the Board, and the Chair of the Board's Audit Committee Responsibility

- 1.01 Receiving and handling complaints. A properly submitted complaint under this policy will be reviewed by the officers to determine the merit(s) of the complaint, and the process for the investigation.
- 1.02 Treating all parties connected to a complaint investigation fairly and equitably.
- 1.03 Maintaining confidentiality regarding the details of complaint(s) to the greatest extent possible.
- 1.04 Conducting an investigation into Whistleblowing Event(s) appropriately and in accordance with relevant legislation, where applicable.
- 1.05 Taking appropriate action(s) if wrongdoing is found.

2 Employee and Volunteer Responsibility

- 2.01 Conducting themselves with honesty and integrity.
- 2.02 Cooperating with the Officer(s) investigating the complaint(s).

3 Complainant(s) Responsibility

- 3.01 Reporting a Whistleblowing Event in accordance with this policy and any applicable legislation.
- 3.02 Acting in good faith in reporting a Whistleblowing Event and providing sufficient information, including relevant records, documents, or details, to support their complaint.
- 3.03 Cooperating with Officer(s) or other third parties investigating a complaint.

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4 References and Related Statements of Policy and Procedure

[Human Resources Policy 1.01 – Glossary](#)
[Human Resources Policy 5.02 – Dispute Resolution](#)
[Human Resources Policy 5.03 – Workplace Violence and Harassment Prevention Plan](#)
[Human Resources Policy 7.10 – Incident Reporting and Investigation](#)
[GEF.org – Protected Disclosure \(Whistleblower\)](#)
[Competition Act, RSC 1985, c C-34](#)
[Criminal Code, RSC 1985, c C-46](#) – Section 425.1 Threats and retaliation against employees
[Public Interest Disclosure \(Whistleblower Protection\), Act SA 2012, c P-39.5](#)
[Public Servants Disclosure Protection Act, SC 2005, c 46](#)

5 Definitions

- 5.01 “**GEF Connect**” means the employee accessible database through SharePoint, which is a web-based collaborative platform that integrates with Microsoft.
- 5.02 “**Tenant**” means a person who rents any type of unit in any of the GEF Seniors Housing buildings.

6 Procedure

- 6.01 A Whistleblowing Event complaint must be submitted in writing, as a formal statement.
- 6.02 If the complaint involves any individual other than the CEO, it must be addressed to the Chief Executive Officer (CEO). If the complaint involves or is against the CEO, it must be addressed to the Chair of the Board or the Vice Chair of the Board.
- (a) The written statement must include the following information:
- Detailed description of the activity, with supporting documentation;
 - Date the complainant became aware of the activity;
 - Name(s) of the individual(s) suspected of the activity; and
 - Step(s) taken, if any, prior to making the complaint (e.g. spoke with Supervisor or Human Resources, reported to an external agency)
- (b) The written statement may be submitted via email or regular mail.

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- Email to: edennis@gef.org
- Mail to: GEF Seniors Housing
Central Services
14220 – 109 Avenue
Edmonton, AB T5N 4B3

- (c) The complainant will receive confirmation of receipt of the written statement within five (5) business days.
- 6.03 If the complainant is an active employee or volunteer, they will not be discharged, terminated, demoted, suspended, threatened, harassed, or in any other way or manner discriminated against as a result of communicating a genuine concern (whether suspected or actual), provided that the complaint has been submitted in good faith. Any employee found to be in violation of this policy when submitting a complaint will be subject to disciplinary action, up to and including termination.
- 6.04 Although the complainant is not required to prove the truth of the allegation, they are required to act in good faith and to provide sufficient information in order to show that there are reasonable grounds for the complaint. The amount of contact between the complainant and the investigator(s) will depend on the nature of the complaint and the detail and clarity of the information provided. The investigator(s) may seek further information from the complainant, which the complainant is required to provide, where available.
- 6.05 Any individual who reports a Whistleblowing Event in bad faith or who reports a Whistleblowing Event to disparage the reputation of GEF or any of its employees, may be subject to disciplinary action up to and including termination (if a current employee), or legal action for non-employees.
- 6.06 Any complaint made under this policy will be treated as confidential and sensitive, subject to applicable legislation.
- 6.07 **Investigation**
- (d) Once a complaint is brought forward in writing, an investigation will be started. Investigations may be conducted internally or by an external investigator.
- (a) A report that summarizes the findings of the investigation will be prepared and any legal or other action(s) will be taken, where appropriate.
- (b) The results of the investigation may be shared with the complainant, to the extent possible, and in the sole discretion of GEF.