

Policy Name	Whistleblower	Date Revised	2020-Jul
Policy Type	Corporate	Date Reviewed	2019-Nov
Approved By	DC Business Leadership Team	Date First Approved	2018-Sep

Dietitians of Canada (DC) is committed to the highest ethical standards. We do this by conducting our business with maximum integrity and by achieving full compliance with all applicable laws, rules, and regulations. In line with this commitment, DC provides an avenue for DC employees, members, volunteers, contractors and other stakeholders to raise concerns they may have about the subjects covered by this policy, and to be assured that in making allegations, they will be protected from reprisal or victimization for raising their concerns in good faith.

This policy covers instances where an employee, member, volunteer, contractor or other stakeholder has evidence of activity ("Reportable Activity") by any employee, volunteer or retained consultant (including external auditors) to their knowledge constitutes:

- Accounting, auditing, or other financial reporting fraud or misrepresentation, including misuse of public funds or public assets, forgery of documents, authorizing or accepting compensation for services not performed;
- Violations of laws that could result in fines or civil damages payable by DC, or that could otherwise significantly harm DC's reputation or public image;
- Unethical business conduct in violation of any [DC corporate policy](#);
- Inappropriate occurrences at a DC event;
- An act or omission that creates a substantial and specific danger to the health, safety, or well-being of employees, members, and volunteers;
- Abuse of power or authority;
- Discriminatory behaviour;
- Concealment of any of the above or any other breach of this policy.

For any issues not covered above, please contact DC by using any of the channels of communications listed at <https://www.dietitians.ca/About/About-Dietitians-of-Canada/Contact-Us>

This policy does not cover personal situations related to employment. DC provides an avenue for employees to raise concerns under its internal Human Resources policies and procedures.

Anyone who reports a Reportable Activity must be acting in good faith. Allegations that are not made in good faith will be viewed as a serious offence and may be subject to discipline up to and including discharge in the case of employees, and/or the severing of the relationship with members, volunteers, contractors or other stakeholders.

DC will not permit any employees, members or volunteers to harass, retaliate or discriminate against those other employees, volunteers, contractors and stakeholders (the Complainant) who, in good faith, report a Reportable Activity. Retaliation in any form will not be tolerated and should be reported using the channels detailed in the Policy.

Any violation of this policy may subject the violator to disciplinary action, which may include, in appropriate circumstances, termination of employment or contract, or legal action.

PROCESS FOR BRINGING FORWARD A WHISTLEBLOWING CONCERN

A Complainant may submit a reportable activity allegation by completing the Whistleblower Reportable Activity Form found at <https://www.dietitians.ca/Policies/Whistleblower-Policy> and submitting as follows:

Wrongdoing with respect to:	Report Form to be sent to:	By Email	By Mail
Chief Executive Officer (CEO)	Chair of the Board of Directors with a copy to the Chair Elect of the Board	board@dietitians.ca	CONFIDENTIAL The Chair and the Chair Elect of the Board of Directors Dietitians of Canada 99 Yorkville Avenue, Second Floor Toronto, ON M5R 1C1

Director, Administration	Chief Executive Officer with a copy to the Chair of the Board	ceo@dietitians.ca and board@dietitians.ca	CONFIDENTIAL The CEO and the Chair of the Board of Directors Dietitians of Canada 99 Yorkville Avenue, Second Floor Toronto, ON M5R 1C1
A DC employee, volunteer or other acting on behalf of DC	Chief Executive Officer with a copy to the Director, Administration	ceo@dietitians.ca and michelle.naraine@dietitians.ca	CONFIDENTIAL The CEO and the Director, Administration Dietitians of Canada 99 Yorkville Avenue, Second Floor Toronto, ON M5R 1C1

A Complainant may remain anonymous. DC will treat all reports made under this policy as confidential to the fullest extent possible while conducting a full and fair investigation even if the Complainant discloses their identity. DC will exercise care to keep confidential the identity of the Complainant until a formal investigation is launched. At that point, Complainant's identity may be disclosed to other individuals only to the extent necessary to conduct a complete and fair investigation. If the Complainant chooses to disclose their contact information, DC will acknowledge receipt of the submission and provide a report on the outcomes of the investigation.

PROVIDING DETAILS ON THE SUBJECT MATTER OF THE COMPLAINT

Whether the Complainant chooses to identify themselves or not, they should give as much information as possible on the matter of the complaint so that the information is sufficient to enable a full investigation. Upon receiving a completed report form in writing or via web submission, the action taken will depend on the nature of the Reportable Activity. Complaints will be handled in one of the following ways:

- *Internal Investigation*
The CEO and / or the Director, Administration are responsible for investigating and resolving most types of reports made under this Policy. In all cases there will be two people responsible for investigating the allegations. Depending upon the nature of the Reportable Activity they may enlist the assistance of one or more DC employees and /or outside legal, accounting or other advisors, as may be appropriate to conduct the investigation.
- *Investigation by Chair of the Board*
If the complaint concerns the CEO, it will be investigated by the Chair of the Board with another member of the Board.

Each Whistleblowing occurrence or event will be treated with utmost care. The results of the investigation will be shared with the Complainant, unless they submit their complaint anonymously.

ACCOUNTABILITY

Complainants are accountable to act in good faith when reporting any Reportable Activity.

Results of the investigation will not include details of any disciplinary action as this is to remain confidential to the individual concerned.

The CEO or the Chair of the Board will advise the DC Business Leadership Team of all complaints received, resolved and results of investigations, on a quarterly basis as part of normal policy monitoring processes. Any reports of Reportable Activity and any resulting investigations will be filed confidentially with any other corporate documents that are legally binding for a period of not less than seven (7) years. A copy of results shall be filed in the file of the employee being investigated.

WHISTLEBLOWER PROCESS

