

POLICY 1.18	Disclosure of Wrongdoings and Protection of Persons who Disclose Wrongdoings	DOMAIN Governance and Ethics
ELT Sponsor: Chief Executive Officer Policy Lead(s): Vice President, Mission, Ethics & Spirituality		Date Approved: July 22, 2025
		Date Effective: July 23, 2025
		Date of Next Review: July 2030

For further information please contact covenantpolicy@covenanthealth.ca

NOTE: The first appearance of terms in bold in the body of this document (except titles) are defined terms – please refer to the Definition section

Policy Statement:

Covenant Health is committed to maintaining a positive working environment for its personnel and upholding the integrity of its business and clinical operations. Covenant Health will take action in an objective manner to address allegations of **wrongdoing** within Covenant Health without reprisal to personnel who report wrongdoings in good faith.

Duty to Disclose:

Any Covenant Health personnel who has a reasonable basis to believe that a wrongdoing has occurred or is occurring within Covenant Health is required to disclose the information on which the belief is based.

Protection from Reprisal:

Covenant Health will not take or condone any adverse action (including demotion, suspension, termination, harassment, or denial of service or benefits) against any Covenant Health personnel or other individual who:

- a) is the purported perpetrator of the wrongdoing, in the absence of reasonable evidence; or
- b) in good faith and without malice or desire for personal benefit, reports a wrongdoing in accordance with this policy.

Purpose Statement:

- To deter and detect wrongdoings within Covenant Health in order to positively impact the reputation, effectiveness, resources, and Catholic identity of Covenant Health, and enhance the working environment for our personnel.
- To protect from retaliatory action against any Covenant Health personnel who, in good faith, discloses a wrongdoing occurring within Covenant Health.
- To comply with whistleblower legislation including the *Public Interest Disclosure (Whistleblower Protection) Act* [Alberta] (PIDA).

Applicability:

Any personnel who believes that they are being asked to commit a wrongdoing, or who believes that a wrongdoing has been committed, shall immediately disclose the matter to the reporting manager

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or the next higher level of management if the alleged incident involves the reporting manager. This is consistent with the principle of subsidiarity in attempting to resolve issues closest to the level in which it occurs, as noted in Covenant Health's code of conduct, *Our Commitment to Ethical Integrity*.

However, subject to the criteria set forth in the 1.18.PROC.1 [Procedures for Disclosure of Wrongdoings and Protection of Persons who Disclose Wrongdoing](#), any personnel who feels this process does not fit his or her circumstances may email the confidential mailbox of the **Designated Officer** for Covenant Health at PublicInterestDisclosure@covenanthealth.ca.

Alternatively any personnel who are considering making a disclosure may contact the Alberta Public Interest Commissioner's office at info@pic.alberta.ca or by calling 1.855.641.8659. They may also wish to proceed to disclose to the Public Interest Commissioner directly by using the online web-form at: www.yourvoiceprotected.ca.

Management or any person acting on behalf of management shall not:

- dismiss or threaten to dismiss an employee;
- discipline or suspend or threaten to discipline or suspend an employee;
- impose any penalty upon an employee; or
- intimidate or coerce an employee

for disclosing wrongdoings in accordance with the requirements of this policy/ procedure. Any of the above actions by management or any person acting on behalf of management will result in disciplinary action up to and including dismissal. In addition, the Office of the Public Interest Disclosure Commissioner may apply other actions, penalties, or fines subject to its legislation.

Managers must promptly communicate all disclosures of wrongdoings to the appropriate **Executive Member** who will assess the allegation and direct an investigation.

Executive Members shall report all **significant disclosures** of wrongdoings to the Designated Officer, who in turn will report material items to the Board of Directors and to the Office of the Public Interest Commissioner (Alberta).

Responsibility:

All Covenant Health facilities, staff, medical staff, students, volunteers and any other persons acting on behalf of Covenant Health (personnel).

Principles:

1. Disclosures of wrongdoings shall be in good faith and shall be reported in writing or in person. Sufficient factual detail regarding a wrongdoing must be provided at the time of disclosure to enable an investigation to be commenced including:
 - a) a description of the wrongdoing,
 - b) the name(s) of individual(s) alleged to have committed a wrongdoing, or are about to commit

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a wrongdoing,

- c) the date of the wrongdoing,
- d) any additional information the Designated Officer or Office of the Public Interest Commissioner (Alberta) may reasonably require in order to investigate the matters contained in the disclosure.

The disclosure of wrongdoings report is provided to assist with the reporting process. While confidentiality of disclosure shall be maintained in the manner set out in this policy, anonymous disclosures of wrongdoing will not be investigated.

2. In the event disclosures of wrongdoing are not reported in the manner prescribed in the procedures, Covenant Health will not be responsible for the protection of these employees.
3. Where personnel who previously disclosed wrongdoing or participated in an investigation of a wrongdoing and subsequently faces reprisal, he/she shall report this matter directly to the next higher level of management or Human Resources if in the opinion of the personnel, there are reasonable grounds to not report to management. Management shall authorize a review and take all necessary measures to:
 - a) permit the personnel to return to his/her duties;
 - b) reinstate the personnel;
 - c) pay compensation in an amount not greater than the amount that is equivalent to any financial or other penalty imposed on the personnel.
4. All disclosed wrongdoings will be dealt with in a prompt and timely manner. Disclosures will be reviewed and investigated as required in accordance with the principles of procedural fairness and natural justice. Timeframes described under PIDA are as follows:
 - a) Maximum five business days to acknowledge receipt of a disclosure of wrongdoing to the employee making the disclosure.
 - b) Maximum twenty business days from date the disclosure was received to determine whether an investigation into a disclosure will be commenced and to communicate that decision to the employee making the disclosure.
 - c) Maximum one hundred and twenty business days from the date the disclosure was made to investigate and submit the written investigation report to the Designated Officer.
 - d) A maximum of thirty business days can be approved by the Designated Officer to extend a time limit for the management of disclosures. Further extensions can only be granted by the Office of the Public Interest Commissioner (Alberta).
5. Any wrongdoing regarding members of the medical staff (physicians, dentists, podiatrists and oral maxillary surgeons) will be managed as outlined by the Medical Staff Bylaws, Section 6.
6. It is Covenant Health's intent to fully investigate any suspected or reported/ alleged acts of wrongdoing. An objective and impartial investigation will be conducted by the appropriate Executive Member regardless of the position, title, length of service, or relationship with Covenant Health or any party who might be or becomes or is the subject of such investigation.
7. In addition to, and apart from, any other sanction provided for by law, a Covenant Health personnel is subject to appropriate disciplinary action, including termination of employment, if

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they commit a wrongdoing.

8. Covenant Health will pursue every reasonable effort to obtain recovery of losses from the offender or other appropriate sources.

Definitions:

Designated Officer means the senior official designated by the Chief Executive Officer to manage and investigate disclosures under PIDA, who for Covenant Health is the Vice President, Mission, Ethics & Spirituality.

Executive Member means any member of the Executive Leadership Team (ELT).

Significant disclosure means, but is not limited to, any disclosure that: (i) relates to the financial position of Covenant Health;

- (ii) affects the safety or wellbeing of staff or patients; or
- (iii) relates to any criminal acts.

Wrongdoing means either a “wrongdoing under PIDA or a “further defined wrongdoing” as outlined below :

- A “wrongdoing under PIDA” means:
 - (a) a contravention of an Act, a regulation made pursuant to an Act, an Act of the Parliament of Canada or a regulation made pursuant to an Act of the Parliament of Canada;
 - (b) an act or omission that creates
 - (i) a substantial and specific danger to the life, health or safety of individuals other than a danger that is inherent in the performance of the duties or functions of an employee, or
 - (ii) a substantial and specific danger to the environment;
 - (c) gross mismanagement, including an act or omission that is deliberate and that shows a reckless or willful disregard for the proper management of
 - (i) public funds or a public asset,
 - (ii) the delivery of a public service, including the management or performance of:
 - (A) a contract or arrangement identified or described in the regulations, including the duties resulting from the contract or arrangement or any funds administered or provided under the contract or arrangement, and

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- B) the duties and powers resulting from an enactment identified or described in the regulations or any funds administered or provided as a result of the enactment, or
- (iii) employees, by a pattern of behaviour or conduct of a systemic nature that indicates a problem in the culture of the organization relating to bullying, harassment or intimidation;
- (c.1) a wrongdoing prescribed in the regulations to PIDA;
- (d) knowingly directing or counselling an individual to commit a wrongdoing mentioned in clauses (a) to (c.1).

and; in addition to the above wrongdoing under PIDA,

- Covenant Health defines the following additional acts as “further defined wrongdoing”:
 - (a) deliberate manipulation and misrepresentation of financial records;
 - (b) unethical and/or illegal activities or those that threaten to undermine our Catholic identity or risk scandal
 - (c) intentional contravention of Covenant Health policies;
 - (d) serious breach of conduct;
 - (e) violation of conflict of interest policies;
 - (f) taking reprisal against staff who disclose wrongdoing; and
 - (g) other similar acts.

Relevant Covenant Health Policy and Policy Support Documents:	
A.	Policies: III-35 Just Culture III-45 Clinical Adverse Events, Close Calls and Hazards 1.03 Conflict of Interest 1.04 Relationships with Industry III-55 Records Management
B.	Procedures:

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	1.18 Procedures for Wrongdoings and Protection of Persons who Disclose Wrongdoings
C.	Guidelines:
D.	Job aids:
E.	Standards:
Keywords: Whistleblower, reprisal	
References: Our Commitment to Ethical Integrity (Code of Conduct) Health Ethics Guide Covenant Health Medical Staff Bylaws The Criminal Code (Canada) The Freedom of Information and Protection of Privacy Act (Alberta) The Health Information Act (Alberta) Public Interest Disclosure (Whistleblower Protection) Act (Alberta) Complaints of reprisal can be referred to the Public Interest Commissioner (Alberta) for investigation. Those who wish to make a complaint of reprisal must complete the online web form at www.yourvoiceprotected.ca . Alternatively, complaints can be submitted by emailing info@pic.alberta.ca or by calling 1.855.641.8659.	
Past Revisions: March 4, 2022 – <i>previously numbered III-70</i> June 18, 2018 August 15, 2014	