

Policy Issuer:	Michelle Dyke, Director of Corporate Services
Author:	Michelle Dyke, Director of Corporate Services
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Next Scheduled Review Date:	November 2022
Board Approval:	November 25, 2019

DISCLOSURE POLICY

Policy Statement

STELLA'S CIRCLE is committed to the highest ethical standards. We do this by conducting our business with maximum integrity, treating all individuals with dignity and respect and by complying with Stella's Circle policies and all applicable laws, rules and regulations. In line with this commitment we provide an avenue for employees (current and past), students, contractors, volunteers, and other stakeholders to raise concerns about Reportable Activities as defined in the Definitions section. We assure that those who raise concerns in good faith will be protected from reprisal or retaliation. Topics not defined as Reportable Activities are covered under other policies such as the Respectful Workplace Policy. If you are unsure about where to bring a concern please contact your manager or the Human Resources Specialist.

Scope

This policy applies to all employees (current and past), students, volunteers (including Board of Directors and Foundation Board Members), contractors, and stakeholders of STELLA'S CIRCLE and all interactions that occur in the workplace.

Definitions

Reportable Activity:
Matters warranting disclosure include the following:

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- An act or omission or unethical conduct that constitutes a violation of Stella's Circle policies;
- An act or omission constituting an offence under any provincial or federal legislation;
- An act or omission that creates a substantial and specific danger to the life, health or safety of employees, volunteers contractors, stakeholders, students, participants or the environment;
- Gross mismanagement or;
- Accounting, auditing or other financial reporting fraud or misrepresentation, including misuse of funds or assets, forgery of documents, authorizing or accepting compensation for services not performed.

Complainant:

Any individual who discloses a Reportable Activity.

Retaliation:

Retaliation occurs when an employer punishes an employee for engaging in legally protected activity. Retaliation can include any negative job action, such as demotion, unwarranted disciplinary action, firing, salary reduction, or job or shift reassignment.

Workplace:

Workplace includes any location in which employees, volunteers and/or students are engaged in activities required for work purposes. This includes, but is not limited to, Stella's Circle properties, parking lots, vehicles, employee/volunteer organized social events, other government and community sites, field locations, participants' homes and during business related travel. Protection against any inappropriate behaviour extends to incidents occurring at or away from the workplace, during or outside working hours, provided the acts are committed within the employment relationship.

Making Disclosures

Stella's Circle encourages individuals to make disclosures of Reportable Activities. You may submit a Reportable Activity allegation in writing as outlined below.

Disclosure with respect to:	Submission sent to:
A Stella's Circle employee, volunteer or other individual/group acting on behalf of Stella's Circle	CEO and the Director of Corporate Services
A Manager	CEO and the Board Chair
CEO	Executive Committee of the Board - Chair, Vice-Chair, Treasurer and Secretary

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Governance Board	Chair of the Foundation Board
Foundation Board	Chair of the Governance Board

No Reprisal

Stella's Circle will not permit any employees or volunteers to harass, retaliate or discriminate against Complainants who, in good faith, disclose a Reportable Activity. Retaliation in any form will not be tolerated and will be subject to disciplinary action up to and including dismissal.

Anonymity

A report can be made anonymously, but it is important to note providing contact information will make it easier to investigate the complaint.

Stella's Circle will treat all reports made under this policy as confidential to the fullest extent possible while conducting the investigation. We will exercise care to keep the identity of the Complainant confidential until the formal investigation is launched. At that point, the identity may be disclosed to other individuals only to the extent necessary to conduct a complete and fair investigation.

Disclosures not made in Good Faith

It is important to understand that Stella's Circle will view seriously any disclosure which proves to be false, malicious or of a frivolous nature, and that any person making such disclosure may be subject to disciplinary action, up to and including dismissal. Please see the Progressive Discipline Policy for more details.

Response

If the complainant provides their contact information they will receive an acknowledgement of their complaint within ten calendar days.

Stella's Circle will respond to each disclosure in a timely and efficient manner. It is important to note that the seriousness, complexity and timeliness of a disclosure will impact the method, resources and speed with which a disclosure is reviewed and/or investigated, and resolved. In all cases there will be at least two people responsible for investigating allegations. Depending on the nature of the Reportable Activity they may enlist the assistance of other Stella's Circle Directors and/or outside legal, accounting or other advisors as appropriate to conduct the investigation.

Accountability

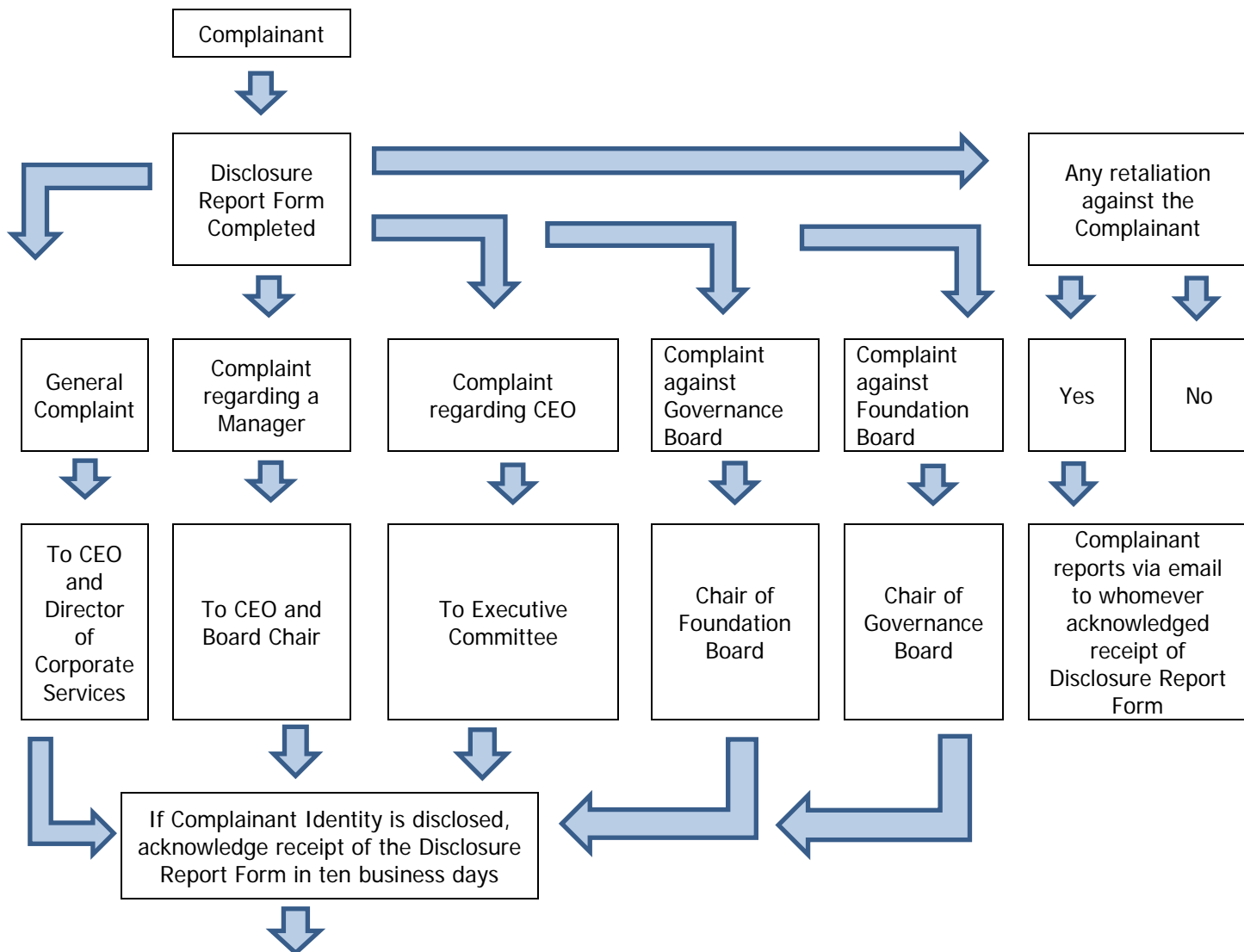
Each Disclosure Report Form will be treated with the utmost care. A summary report, in a format deemed appropriate by the investigator, will be shared with the Complainant, their contact information

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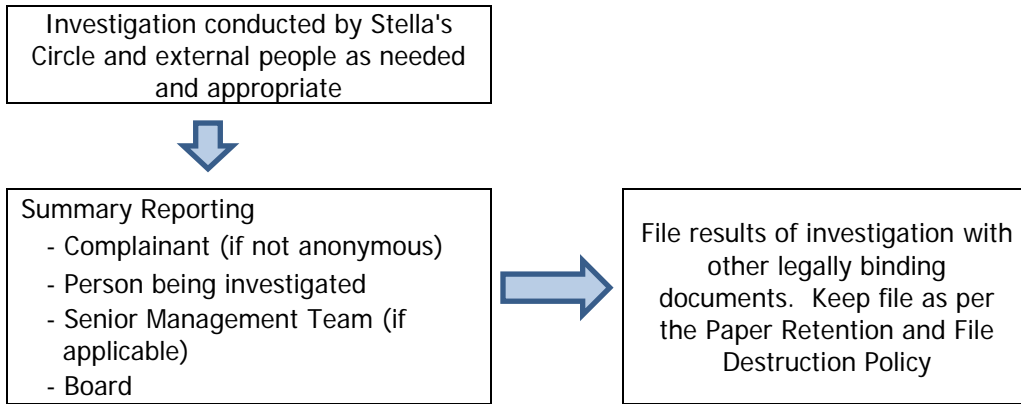
has been provided. Results of an investigation will not include details of any disciplinary action as this is to remain confidential to the individual concerned.

Any reports of Reportable Activity and investigation documentation will be filed confidentially with other legally binding corporate documents for a period of not less than 10 years, after which time they will be destroyed as per Stella's Circle Paper Retention and File Destruction Policy.

Disclosure Process



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Disclosure Report Form

This form is used to file a Reportable Activity as outlined in Stella's Circle Disclosure Policy. If you have a concern of a more general nature please contact your manager or the Director of Corporate Services for more information/direction.

Contact Information (optional - you may submit your complaint anonymously)

Date	
Name	
Phone Number	
Email Address	

Date you became aware of the Reportable Activity

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Describe the Reportable Activity, including individual(s)/programs suspected

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How did you become aware of the Reportable Activity?

Describe steps, if any, you took to address the concerns, with dates, prior to completing this form (i.e. informed supervisor).

What evidence do you have such as documents that should be reviewed, or names of people who should be interviewed?

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What outcome do you expect out of the investigation of the complaint? (Optional)

You may submit this form by mail or email as per the directions below:

Stella's Circle
142 Military Road
St. John's, NL
A1C 2E6

If reporting by mail, please indicate "Confidential" on the envelope and address it to the appropriate party.

Disclosure with respect to:	Submission sent to:	Email to:
A Stella's Circle employee, volunteer or other individual/group acting on behalf of Stella's Circle	CEO and Director of Corporate Services	l.browne@StellasCircle.ca

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Managers of Stella's Circle	CEO and the Board Chair	SCBoardChair@StellasCircle.ca
CEO	Executive Committee of the Board	SCBoardChair@Stellascircle.ca
Governance Board **	Chair of Foundation Board	SCFBoardChair@StellasCircle.ca
Foundation Board **	Chair of the Governance Board	SCBoardChair@StellasCircle.ca

** Other option if the complaint is against the board is a third party contact