

Volunteer Whistle-Blowing Policy and Response Procedure

Document 219002

Context and Purpose

The Canadian Institute of Actuaries (CIA) is committed to the highest standards of openness, honesty, and accountability. In line with this commitment, the CIA expects volunteers and our stakeholders, who may have serious concerns about any aspect of the CIA's operations, to have a mechanism to take the required steps to raise those concerns.

Volunteers can be the first to realize that there may be something seriously wrong within the organization's operations. However, they may decide not to express their concerns as they feel that speaking up would be disloyal to their colleagues or to the organization. They may also fear possible repercussions of harassment or victimization. In these circumstances, they may feel it would be easier to ignore the issue rather than report what may be a suspicion of malpractice or observed malpractice.

The Whistle-Blowing Policy and Response Procedure defines the investigation and expedient remedying, as appropriate, of any reported wrongdoing by the CIA or any of its volunteers, employees, or contractors. A whistle-blowing mechanism enables all volunteers to act responsibly to uphold the reputation of the CIA and maintain both internal and external confidence.

Scope

This policy is intended for volunteers, but may involve wrongdoing on the part of a volunteer, staff member, stakeholder, or contractor; therefore, the policy applies to all of these groups.

Policy Statements

Volunteers can raise their concerns without fear of victimization, subsequent discrimination, or disadvantage. This whistle-blowing policy and procedure are intended to encourage and enable volunteers to raise these types of concerns within the CIA, rather than simply overlooking a problem.

The Whistle-Blowing Policy and Procedure are intended, as a clear statement, that if any wrong doing by the CIA or any of its volunteers, employees or contractors is identified and reported to the CIA, it will be thoroughly investigated and remedied expediently, as appropriate. The CIA will further examine the means of ensuring that such wrong doing can be prevented in the future. A whistle-blowing mechanism enables all volunteers to act responsibly to uphold the reputation of the CIA and maintain both internal and external confidence.

Any volunteer who makes a disclosure or raises a concern under this policy will be protected if the volunteer

- a. Discloses the information in good faith through the specified process;
- b. Believes the concern to be substantially true;
- c. Does not act maliciously or make false allegations; and
- d. Does not seek any personal or financial gain.

Anyone with a complaint or concern about the CIA's activities should contact their immediate council/committee/task force chair.

If the volunteer expresses the complaint or concern verbally to one of the individuals mentioned above, the volunteer should follow up in writing.

The complaint process is composed of steps to ensure a timely response to all complaints raised, that the complaints are properly investigated, that remedial actions are taken if necessary, and that confidentiality and anonymity are respected where possible. Please consult appendix A on the whistle-blowing complaint and response procedures for further details.

Exemptions

N/A

Escalation Procedures/Management of Non-compliance with this Policy

If the person has concerns with their immediate council/committee/task force chair, they should contact one of the following, according to the circumstances:

- Director, membership and operations;
- Executive Director;
- Chair of the Human Resources, Finance, Audit, and Risk Committee; or
- CIA President.

Definitions and Abbreviations

Wrongdoing involves any unlawful or illegal behaviour and can include, without limitation

- a. Any unlawful civil or criminal act;
- b. Harassment, including sexual harassment;
- c. Breach of or failure to implement or comply with any approved CIA policy, bylaws, or rules of professional conduct;
- d. Knowingly breaching federal or provincial laws or regulations;
- e. Unprofessional conduct or conduct below recognized, established standards of practice;

- f. Questionable accounting or auditing practices;
- g. Dangerous practice likely to cause physical harm/damage to any person or property;
- h. Failure to rectify or take reasonable steps to report a matter likely to give rise to a significant and avoidable damage, cost, or loss to the CIA;
- i. Abuse of power or authority for any unauthorized or ulterior purpose;
- j. Unfair discrimination during a volunteer term of service or provision of services; and
- k. Breach of the CIA’s Volunteer Code of Conduct Policy.

This list is not comprehensive, but is intended to give an indication of the kind of conduct which may constitute wrongdoing.

Associated Documents

- [Volunteer Code of Conduct](#)
- [Workplace Violence and Harassment Policy and Program](#)

References

N/A

Monitoring, Evaluation, and Review

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Next review date	2021

Procedures

Volunteer Whistle-Blowing Complaint and Response Procedures

Appendix A – Volunteer Whistle-Blowing Complaint and Response Procedures

Complaint Process – Response

The CIA will respond in writing to all complaints raised. Depending on the seriousness and circumstances of the concern, the complaints may

- Be investigated by Director, membership and operations, or a third-party external investigator; and/or
- Be referred to the police.

To protect individuals and those accused of misdeeds or possible malpractice, initial inquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take.

Some concerns may be resolved by agreed action without the need for investigation. If urgent action is required, this will be taken before any investigation is conducted.

Within 10 business days of a concern being raised, the responsible CIA representative will do the following:

- Acknowledge reception of the concern;
- Indicate how the representative proposes to deal with the matter;
- Give an estimate of how long it will take to provide a final response;
- Inform the complainant whether any initial inquiries into the complaint have been made; and
- Inform the complainant whether further investigation will take place and, if not, the reason behind that decision.

The amount of contact between the CIA representative or any other party reviewing the concern and the complainant will depend on the nature of the matters raised, the potential difficulties involved, and the clarity of the information provided. If necessary, the person responsible for the investigation will seek further information from the complainant.

The CIA will take steps to minimize any difficulties which the complainant may experience as a result of raising a concern. For instance, if the complainant is required to give evidence in criminal or disciplinary proceedings, the CIA will arrange for the complainant to receive advice about the process.

The CIA will ensure that the matter has been properly addressed. Thus, subject to legal or organizational constraints, the CIA will inform the complainant of the outcomes of any investigation.

The CIA will further examine the means of ensuring prevention of such wrongdoing in the future.

Complaint Process – Time Frame

Concerns will be investigated as quickly as possible given the circumstances of each case. As noted above, it may be necessary to refer a matter to an external agency and this may result in an extension of the investigative process. Both the seriousness and complexity of any concern

may have an impact on the time taken to investigate a matter. The designated person will indicate at the outset the anticipated time frame for investigating the concern.

If the complainant is not satisfied with the results of the investigation, they may submit their concerns in writing to the Executive Director or the CIA President to handle such appeals. The Executive Director will immediately undertake a review of the file. If the Executive Director is involved in the presumed wrongdoing, the file will be escalated to the CIA President.

Prevention of Recriminations, Victimization, or Harassment

The CIA will not discharge, threaten, harass, or otherwise take any disciplinary action against any CIA volunteer who in good faith raises a concern, reports any suspected wrongdoing, or who discloses or provides information or assistance in connection with any internal investigation of legal inquiry.

Confidentiality and Anonymity

The Institute will respect the confidentiality of all whistle-blowing concerns received, to the extent that it is feasible.

All individuals involved with a whistle-blowing investigation will be informed that it may be necessary during the investigation to release details including names and confidential information to verify information and thereby remedy the concern.

False and Malicious Allegations

Any allegation which proves to be unsubstantiated and made maliciously or knowing it to be false will be regarded by the CIA as a serious offence which may result in disciplinary action.

Whistle-Blowing File Maintenance

The Executive Director's office will maintain all whistle-blowing files received. Each concern will be separately documented by the investigative parties and will be placed in a sealed envelope, clearly marked "Confidential" at the conclusion of the investigation. The status of the file will be clearly marked (pending or closed, and if closed, an executive summary describing the final disposition of the case will be outlined on the front of the file, prior to the envelope being sealed).

These files will remain sealed within the Executive Director's unit until the expiration of the time allotted under the predetermined records retention schedule of seven years, or any other appropriate/mandated period.