

Whistleblower Complaints

Policy Title:	Whistleblower Complaints		
Section:	Governance		
Category:	General		
Applies to:	Board & CEO		
Version:	GG05.01	Replaces: n/a	Version #1.0
Effective Date:	11 March 2026		
Related to other policies:			
Scope:	To specify the Association's commitment to receiving and evaluating concerns and complaints from its staff, volunteers, and members.		
Approved by:	Board		

Purpose of Policy:

To specify the Association's commitment to receiving and evaluating concerns and complaints from its staff, volunteers, and members.

Definitions:

Whistleblower - a person who raises serious concerns about wrongdoing within an organization. This can include unethical behaviour, violations of laws or policies, misuse of funds, conflicts of interest, or actions that jeopardize the organization or its members.

Policy Content:

The Board holds ultimate responsibility for oversight of CEA, its Board Members, employees, and volunteers. There should be a clear point of access for any individual to express serious concerns about the organization to the Board. These types of concerns relate to serious ethical, behavioural, and stewardship of CEA.

The Association Complaints and Discipline procedure should include:

- Who has the right to register a complaint – members, staff, Board members, and others as determined on a case-by-case basis.
- To whom is the complaint filed and recognised submission process
 - Complaints involving the CEO, Board Chair or other persons who may be privy to information gathered during the complaints process should be directed to a recognised authority who is not in a conflicted position
- Obligation to disclose, such as matters involving legal or professional issues
- Who hears the complaint – protection of anonymity, declaring conflicts of interest, response time, and possible outcomes.
- Ensuring non-retaliation by persons who are the subject of a complaint
- What records are kept and how is the matter communicated internally and externally.

Authority & Supporting Documents:

- The Board of CEA retains authority over this policy.

Related documents:

- Appendix A: Complaints and Discipline Procedure

Approval & History

11 March 2026

Approval

This Policy was approved by the Board on the effective date indicated above.

Derek de Candole

History

<u>Version</u>	<u>Policy Name</u>	<u>Reason</u>	<u>Date</u>

Appendix A - Complaints and Discipline Procedure

CEA is committed to the highest ethical standards. We do this by conducting our operations with maximum integrity and by achieving full compliance with all applicable laws, regulations, and bylaws. In line with this commitment, CEA provides an avenue for its employees, 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 retaliation for raising their concerns in good faith.

This procedure covers instances where an employee, participant, 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 CEA funds or assets, authorizing or accepting compensation for services not performed;
- Violations of laws that have could negative consequences to CEA, or that could otherwise significantly harm CEA's reputation or public image;
- Unethical business conduct in violation of any CEA corporate policy;
- An act or omission that creates a substantial and specific danger to the health, safety, or well-being of employees, board members, and volunteers;
- Fraudulent activities
- Abuse of power or authority;
- Discriminatory behaviour;
- Concealment of any of the above or any other breach of this policy.

This procedure does not cover personal situations related to employment. CEA 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 in the case of volunteers, contractors or other stakeholders.

CEA will not permit any employees, contractors, 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.

Who handles complaints?

1. Complaints about staff (excluding the CEO), volunteers, and contractors will be handled by the CEO. The Executive / HR Committee will be notified that a complaint has been received, and the CEO will provide regular updates to the Executive / HR Committee.
2. Complaints about members will be handled by the CEO.
3. Complaints about the CEO will be managed by the Executive / HR Committee. They will notify the Board of the complaint, and the Executive / HR Committee will provide regular updates to the Board.
4. Complaints about a Board member will be managed by the Executive / HR Committee. If the complaint relates to a member of the Executive / HR Committee, the Finance and Audit Committee will manage the complaint.
5. Complaints related to financial matters (regardless of the complainant) will be managed by the Finance and Audit Committee. They will notify the Board of the complaint and the Finance and Audit Committee will provide regular updates to the Board.

What is done with a complaint?

1. The individual or group responsible for managing the complaint will confirm the process they will use to review, evaluate, and report on the complaint. External parties such as legal counsel, investigators, and consultants may be engaged to support the complaint process.
2. Prior to requesting information from the individual(s) named in the complaint, the individual or group responsible for managing the complaint will confirm the complaint was received and explain expectations of non-retaliation against the complainant.
3. Information will be requested from the individual who submitted the complaint and any parties named in the complaint. Objective, verifiable, and documented evidence is preferred.
4. The individual or group managing the complaint will evaluate all evidence and determine if wrongdoing has occurred. With this analysis completed, a report will be prepared on the complaint and shared with the Board.
5. The consequence of proven misconduct will be developed by the individual or group responsible for the complaint and recommended to the Board for review and approval (except matters related to staff and external contractors).
6. Decisions regarding the complaint and any subsequent actions will be communicated to the involved parties

7. Results of the investigation, decisions, and actions filed along with any accompanying legal documents. Recommended storage to be a minimum of seven (7) years and to meet or exceed any legal requirements concerning the nature of the complaint.
8. Complaints received with actions related to a breach of the law may be forwarded to other processes for additional investigation.