

<b>Manual</b>	<b>GOVERNANCE POLICY</b>		<b>POLICY</b>
Section 3.0	Program Quality and Effectiveness		
Title	<b>WHISTLEBLOWER POLICY</b>		
Issuing Body/ Prepared By	Governance and Nominating Committee		
Approved by	Board of Directors		<b>Number:</b> GOV 3.60
Effective Date	O: January 2007	Version 3	<b>File Name:</b> "Lhgdata"(J:)/Dept'l/Admin/Board & Board Cmtes/Board BWH/Board Policies/3.60 Whistleblower
Revised Date	R: April 2008 R: October 2011		
Controlled document. Any documents appearing in paper form must be used for reference purposes only. The on-line copy on the file server above must be considered the current documentation.			

## 1.0 Policy

Bluewater Health (the Hospital) is committed to maintaining a safe, fair and productive environment. All those receiving healthcare services, working at or visiting the Hospital are expected to behave in a professional manner that respects the rights of others and contribute to an environment that is free from verbal or physical abuse, unlawful harassment or discrimination.

Bluewater Health is therefore providing a process for any person associated with the hospital to communicate any legitimate and genuine concerns in relation to:

- Criminal activity, breach of legal obligations, financial malpractice, fraud, or any attempt to conceal information relating to the above, including information that is considered confidential
- Harassment or discrimination of anyone receiving healthcare services, working or visiting the Hospital
- Patient, visitor, staff, physician, volunteer or student safety within Hospital premises

This policy does not apply to:

- Personal complaints concerning an employee's terms and conditions of employment
- Professional staff agreements with the Hospital
- Volunteer and student arrangements with the Hospital
- Any aspects of the working relationship in the Hospital, or
- Disciplinary matters.

Such issues are dealt with under the provisions of duly negotiated agreements (including collective agreements), applicable current hospital policies and procedures, and federal or provincial laws as appropriate.

## 2.0 General Procedure

- a) Disclosure regarding concerns within this policy may be made, in confidence, to an external firm retained for this purpose. This firm will review the information provided and determine, in consultation with the Hospital, whether an investigation should be conducted and what form it should take. A detailed process will be made available through the selected outside firm.
- b) The investigation, depending on the nature of the matter raised may be –

- Investigated internally by the Hospital
  - Referred to the Hospital's external auditors
  - Investigated externally by an independent organization
  - Referred to the police.
- c) A general update on the investigation will be communicated to the person making the disclosure.
- d) The external firm will provide regular reports to the CEO of Bluewater Health regarding disclosures received pursuant to this policy as well as the outcome of any investigative process.
- e) Notwithstanding section 2 d) any disclosure regarding concerns related to the CEO will be reported to the Board Chair by the selected outside firm.

### **3.0 Guiding Principles**

The guiding principles relating to this policy are –

- Confidentiality for the person making disclosure. (The outside firm will not disclose the individual's name to the hospital. In the case of legal proceedings disclosure to the police and/or courts may be required).
- Anonymous complaints will not be accepted
- The Hospital will treat reprisals towards the person making disclosure seriously and take appropriate disciplinary or other action
- Allegations which are determined to be false or malicious after investigation will be considered to be mischief and treated seriously and appropriate disciplinary or other action will be taken
- The Hospital will not condone any attempt to conceal evidence and/or information relating to matters covered under this policy

#### **Monitoring:**

- Method:
1. Review of the policy (every three years)
  2. Reports to Board by the CEO of Bluewater Health related to the Third party Whistleblower services