

Council Policy

Policy Title	Council Safe Disclosure Policy
Date Created	June 2020
Date of next Review	September 2021

1. POLICY STATEMENT

The College of Physicians and Surgeons of Alberta (CPSA) Council is committed to upholding the values and high standards of legal, fiscal and ethical behaviour by encouraging Council members to disclose/report serious, suspected or actual improper behaviour. By doing so, under a recognized process, Council is fostering a culture of ethical behaviour and personal safety which protects Council members (Reporter) from reprisal when they bring forward concerns in good faith.

2. PURPOSE

The purpose of this policy is to:

- Provide a mechanism through which CPSA Council members can confidentially disclose harassment, suspected fraud, financial or administrative irregularities, unethical conduct or other wrongdoing that they have witnessed, or have otherwise obtained information about or evidence of, in the process of performing their roles and responsibilities as members of Council.
- Confirm the Council's obligation to protect Council members who make good faith disclosures from reprisal.
- Confirm the Council's obligation to ensure the privacy and fair process of the person(s) against whom allegations have been made.
- Provide assurance that Council members who knowingly make false allegations may be subject to appropriate disciplinary action as authorized under the bylaws.

3. SCOPE

The policy applies to all members of Council, including those appointed, elected or sitting as recognized non-voting members.

4. RESPONSIBILITIES

All Council members have a responsibility to disclose/report all serious, suspected or actual improper behaviour.

Safe Disclosure and Responsible Officer

- The President of Council is the Responsible Officer who will receive and handle disclosures.
- In the event the President is a person making the disclosure (the Reporter), or a person with whom the disclosure is about, the Director of People and Culture will be engaged to determine who would be appropriate to serve as the Responsible Officer.
- When disclosures/report of financial irregularities are submitted, the Responsible Officer must notify the Chair of the Finance and Audit Committee.

Disclosing/Reporting Violations:

- The reporter should ensure they have reasonable grounds prior to disclosing/reporting a serious, suspected or actual improper behaviour. They will be required to provide sufficient information to enable an investigation to be undertaken. This information should include, at a minimum, what improper behaviour took place, where and when it occurred, and the name(s) of the individual(s) involved (including witnesses). (See: Council Safe Disclosure Reporting Form).
- The Reporter can disclose/report a serious, suspected or actual improper behaviour confidentially and/or anonymously. Anonymous disclosure/report can be mailed to the CPSA President (or the Director, People and Culture) via the CPSA mailing address. Please label Private & Confidential.
- If disclosure is not anonymous, share your concerns with the Responsible Officer as soon as possible.
- The Responsible Officer has a duty to keep all disclosures/reports confidential and any disclosure of confidential information will be limited to the extent required to investigate the situation. In cases where the reporter's name must be disclosed to ensure a thorough investigation is conducted, the Reporter will first be notified by the Responsible Officer.
- The Registrar and required staff, such as the Chief Financial Officer, Chief of Staff or Director of People and Culture, may be required to assist the Responsible Officer with the disclosure as resources may be needed to

conduct a thorough investigation. The role of the Registrar or CPSA staff will be to assist the Responsible Officer as requested and all information will be held confidential. It is the Registrars responsibility to ensure CPSA staff ensure confidentiality of the matter.

- The Responsible Officer will notify the Reporter (unless anonymous) to acknowledge the disclosure/report within 10 business days of receipt. All disclosures/reports will be promptly investigated and resolved with corrective action as necessary.
- The Responsible Officer will notify the Reporter (unless anonymous) when the matter has been resolved.

Safe Environment without Retaliation:

- This policy is intended to create a safe environment and process for Council members to disclose/report serious, suspected or actual improper behaviour.
- Council members who disclose/report a serious, suspected or actual improper behaviour violation in good faith will not face any negative consequences or reprisals (e.g., harassment, retaliation or adverse employment consequences). However, malicious or knowingly-false allegations are unacceptable and may result in disciplinary action being taken by Council in accordance with Council Bylaws.
- Council members who feel they are, or have been, subject to retaliation can report such retaliation to the Responsible Officer.
- Council members who retaliate against the Reporter may be subject to discipline, including removal from Council in accordance with Council Bylaws.
- Council members who report, or are the subject of a disclosure, may have the opportunity to appeal the decision by the Responsible Officer. The Responsible Officer will assign a Council member, who will be supported by appropriate CPSA staff, to be responsible for setting up an appeal process based on the specific circumstances of the situation.

5. APPROVAL

This policy requires approval by the CPSA Council.

6. AUTHORITY DOCUMENTS

[Health Professions Act Part 1 Section 5 & 6.](#)

[CPSA Bylaws](#)

7. SUPPORTING DOCUMENTS

Council Safe Disclosure Reporting Form

Council Safe Disclosure Procedure Document

Council Code of Conduct

Council Conflict of Interest (Draft not yet approved)

8. DOCUMENT HISTORY

VERSION NO.	Version Date	DESCRIPTION OF CHANGE
1	June 26, 2020	Initial Policy
2	September 10, 2020	Approved by Council
3	November 23, 2020	Revision regarding designating the Responsible Officer
APPROVAL	DATE	Signature
Motion #C42-20	September 10, 2020	
Motion #C59-20	December 3, 2020	