



Procedure BF - #2

Title: **FINANCIAL REPORTING – WHISTLEBLOWER PROCEDURES**

Adopted: November 3, 2009

Revised: April 2019, November 2019

Related Documents: Policy BF 001

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## **PURPOSE**

The purpose of this procedure is to provide for employees and other stakeholders a mechanism to report their concerns regarding the integrity of Bloorview's accounting, internal accounting controls or auditing matters ("Financial Matters").

## **PROCEDURES**

### **Means of Reporting**

1. There are two established means for employees/stakeholders to report their financial reporting concerns as follows:
  - a) Through existing chain of communication - An employee can report violations of Policy BF 001 to the Supervisory Officer of Bloorview School Authority. It is expected that most financial reporting issues will be reported in this manner.
  - b) Directly to the Chair of the Finance and Audit Committee - employees may raise their financial reporting concerns in writing directly with the Chair of the Finance and Audit Committee via email or other correspondence.

### **Investigation**

2. Upon receipt of a financial reporting concern, the Supervisory Officer or the Chair of Finance and Audit shall evaluate the severity of the concern to determine whether an internal or external investigation is required. The Supervisory Officer or Chair of Finance and Audit shall maintain oversight of the investigation to ensure appropriate and timely resolution.

3. Should an external investigation be required, this should be conducted by an independent accounting firm followed by the police (if appropriate).

## **Reporting**

4. To the Finance and Audit Committee:
  - Financial reporting concerns shall be reported to the Finance and Audit Committee by the Supervisory Officer at scheduled meetings of the Committee.
  - Concerns involving the Supervisory Officer or the Chair of Finance and Audit shall be raised directly with the Chair of the Board.
5. To the Claimant:

The status/resolution of the investigation shall be communicated to the claimant, where possible.

## **Protection from Retaliation**

6. Bloorview School Authority shall protect from admonishment, discipline or retaliatory action any employee who in good faith reports a Financial Reporting Whistleblower concern in accordance with the methods described in this Policy.

This protection does not extend to employees who make frivolous or malicious complaints in the opinion of the Supervisory Officer or Chair of Finance and Audit.

## **Consequences of Interference**

7. Interference (i.e., intimidation) will be treated as a serious offence subject to potential disciplinary action up to and including dismissal.

## **Roles and Responsibilities**

8. Finance and Audit Committee
  - Review and recommend approval of the Financial Reporting Whistleblower Policy to the Board of Trustees.
  - Receive, analyze and investigate as required financial reporting concerns.
9. Supervisory Officer and Chair of the Finance and Audit Committee

The Supervisory Officer and Chair are responsible for the overall management of the Policy and the financial reporting concern handling process. This includes:

- Develop, maintain and manage the Financial Reporting Whistleblower Policy;
- Conduct investigations of financial reporting concerns, except those performed under the direct supervision of the Finance and Audit Committee;

- Communicate with employees, either directly or through writing, the goals and objectives of the Policy;
- Report to the Finance and Audit Committee and/or the External Auditors;
- Consolidate, file and retain all concerns received, together with the status/results of investigation.

### **All Bloorview School Authority Employees**

10. Act with integrity and honesty in all financial reporting related duties.
11. Raise concerns over the integrity of the financial reporting, internal financial reporting controls or auditing matters through one of the means identified in this Policy.