

Anonymous Reporting of Alleged Wrongdoing (Whistleblower) Procedure

1. Intent

- 1.1. The intent of this procedure is to provide a third-party system to digitally and anonymously report instances of alleged Wrongdoing and notify the correct individual who can further look into the reports.

2. Definitions

- 2.1. **Anonymous Reporting Tool** refers to an online or phone-based service where Thames Valley District School Board (TVDSB) employees and Trustees can report alleged Wrongdoing.
- 2.2. **Anonymous Reporting Tool Provider** refers to the third-party vendor contracted by TVDSB to provide an Anonymous Reporting Tool to report alleged Wrongdoing and ensure the notification of reports received are sent to the appropriate individual(s).
- 2.3. **Board of Trustees** or **Board** refers to the elected Board of Trustees of TVDSB.
- 2.4. **External Parties** refers to an external practitioner that will conduct investigations into alleged Fraud.
- 2.5. **Report Assessment Team** refers to the group of TVDSB personnel, and / or External Parties, responsible for conducting internal investigations triggered by reports received through the Anonymous Reporting Tool. This team is tasked with determining the validity of the reported fraud through a systematic and thorough investigation process.
- 2.6. **TVDSB** or **School Board** refers to the district school board formed under the *Education Act* (Ontario) and known as Thames Valley District School Board.
- 2.7. **TVDSB Senior Administration** refers to TVDSB staff holding the position of Executive Officer, Supervisory Officer or Director of Education.
- 2.8. **Wrongdoing** refers to any action or behaviour by an individual that is illegal, unethical, or against the policies and procedures of the School Board. Wrongdoing is

defined to include, but is not limited to, harassment, discrimination, violation of safety protocols, and any other conduct that undermines the integrity and functioning of the School Board, which are covered in, but not limited to TVDSB's Harassment Policy (3004) and Procedure (3004a), Progressive Discipline of Employees Policy (3012) and Procedure (3012a) or Employee Code of Conduct Policy (3017) and Procedure (3017a). Wrongdoing also includes Fraud, as defined below.

2.8.1. **Fraud** refers to wrongful or criminal deception committed by an individual with the intent of obtaining financial or personal gain, which includes, but is not exclusive to, the following actions:

- 2.8.1.1. The theft or unauthorized use of a TVDSB asset (e.g. cash, financial funds, furniture, computers and related peripherals, smart phones, vehicles, machinery, tools, etc.) Note: In certain circumstances, use of TVDSB assets can be authorized by the direct supervisor of the TVDSB employee on a case-by-case basis or through blanket permission;
- 2.8.1.2. The inflation or non-work-related claim of expenses in contravention of the Expense Reimbursement Policies (1005 and 2003) and Procedures (1005a and 2003a);
- 2.8.1.3. The knowing misrepresentation of financial information through the alteration, forgery, or unauthorized destruction of electronic or manual data and/or documentation of a financial nature;
- 2.8.1.4. Invalid claims for paid leaves of absence, false time reporting and falsification of benefit claims;
- 2.8.1.5. Providing preferential treatment in the selection and/or engaging in business with vendors in contravention of the Purchasing Policy (1001) and Procedure (1001a), such as acceptance of bribes and gifts; and
- 2.8.1.6. Misuse or abuse of authority to influence the actions of another in relation to 2.8.1.1 through 2.8.1.5

3. Objective of Procedure

- 3.1. This Procedure outlines the steps that a TVDSB employee or Trustee would follow to anonymously file a report of alleged Wrongdoing.
- 3.2. This Procedure outlines the contractually agreed-upon steps that the third-party

reporting services will follow upon receiving any reports of alleged Wrongdoing.

4. Roles and Responsibilities

4.1. The **Business Services Department** is responsible for:

4.1.1. The procurement and contract management of the Anonymous Reporting Tool Provider; which includes a contractual agreement to provide:

4.1.1.1. A mechanism that TVDSB employees and Trustees can anonymously report online or by phone allegations of Wrongdoing; and

4.1.1.2. A secure and confidential archive of all reports received through the Anonymous Reporting Tool.

4.1.1.3. The ability to track investigations and close Fraud reports involving TVDSB employees, with the exception of TVDSB Senior Administration, or Trustees and those pertaining to paid leaves of absence, false time reporting and falsification of benefit claims.

4.2. The **Human Resources Department** is responsible for the investigation and closure of reports of conduct related to TVDSB's Harassment Policy (3004) and Procedure (3004a), Progressive Discipline of Employees Policy (3012) and Procedure (3012a) or Employee Code of Conduct Policy (3017) and Procedure (3017a) and other governing documents like Collective Bargaining Agreements and Fraud related to paid leaves of absence, false time reporting and falsification of benefit claims involving TVDSB employees excluding Senior Administration.

4.3. The **External Parties** is responsible for receiving all reports of alleged Wrongdoing relating to the Director of Education or Trustees.

5. The Structure of the Anonymous Reporting Tool

5.1. TVDSB shall provide a third-party Anonymous Reporting Tool that TVDSB employees and Trustees can use to report alleged Wrongdoing. The Anonymous Reporting Tool will have the following parameters:

5.1.1. A tool that allows TVDSB employees and Trustees to report alleged Wrongdoing online or by phone, with the option to remain anonymous;

5.1.2. TVDSB information is stored on servers in Canada;

- 5.1.3. TVDSB information is secure and is kept confidential;
- 5.1.4. There is a mechanism for the Business Services, Human Resources Departments and the External Parties to:
 - 5.1.4.1. Access submitted reports of alleged Wrongdoing;
 - 5.1.4.2. Track and document ongoing investigations; and
 - 5.1.4.3. Document outcomes of investigations and close reports.
- 5.1.5. Includes an access rights hierarchy to ensure that Business Services and Human Resources staff involved in the Anonymous Reporting Tool process will not be notified or given access to the report if they are suspected of alleged Wrongdoing;
- 5.1.6. All reports of alleged Wrongdoing pertaining to the Director of Education or Trustees will be shared directly and exclusively with the External Parties;
- 5.1.7. That reports are maintained in an archive for the duration of the contract.
- 5.1.8. That archived and open reports can be saved to TVDSB servers, if there is a change in the Anonymous Reporting Service Provider.

6. Submitting Reports of Alleged Wrongdoing

- 6.1. TVDSB employees and Trustees have the ability to submit reports of alleged Wrongdoing through the Anonymous Reporting Tool. This is not the only way to report alleged Wrongdoing. Please refer to the Fraud Management and Prevention Procedure (1008a) or the Harassment and Discrimination Procedure (3004a) for other reporting options.
- 6.2. The Anonymous Reporting Tool can be accessed through the TVDSB Employee Portal. Furthermore, the Anonymous Reporting Tool's phone number and website information shall be posted to the Business Services' SharePoint site.
 - 6.2.1. The Anonymous Reporting Tool provides an option for the Claimant to provide their contact information. This information is not released to TVDSB unless authorized by the Claimant. This option allows the Investigative Team the opportunity to ask follow-up questions regarding the allegation.

- 6.2.2. In the absence of this information, the investigation may not progress.
- 6.2.3. There may be instances where TVDSB is concerned about the safety of the claimant. Therefore, TVDSB may request that the claimant disclose their identity.
- 6.3. All TVDSB employees and Trustees who, in good faith, report or provide evidence of Wrongdoing shall be protected from any form of retaliation, threat or reprisal.
 - 6.3.1. If the TVDSB employee faces retaliation, threat or reprisal, they should report it to their immediate supervisor.
 - 6.3.1.1. If the supervisor is implicated in the alleged Wrongdoing or may retaliate, the report should be escalated to the next level of supervision.
 - 6.3.1.2. If a Trustee faces retaliation, threat or reprisal, they should report it to the Chair of the Board of Trustees.
 - 6.3.1.2.1. If the Chair of the Board of Trustees is involved in the alleged Wrongdoing the Vice-Chair of the Board will be contacted.
- 6.4. The TVDSB employee or Trustee must have reasonable grounds to make an allegation and have no false or malicious intent.
- 6.5. In instances where baseless allegations are made with false or malicious intent, the TVDSB employee shall be subject to TVDSB's Harassment Policy (3004) and Procedure (3004a), Progressive Discipline of Employees Policy (3012) and Procedure (3012a) or Employee Code of Conduct Policy (3017) and Procedure (3017a).
 - 6.5.1. For instances where a Trustee has made baseless allegations with false or malicious intent Appendix C of the TVDSB Board Bylaws shall be used.
- 6.6. If a TVDSB employee or Trustee reveals their identity in a report, TVDSB will protect their anonymity as much as possible during the investigation.

7. Receipt and Access to Reports of Alleged Wrongdoing

- 7.1. Access to the Anonymous Reporting Tool is restricted to:

- 7.1.1. Manager of Business Services, or delegate;
 - 7.1.2. Manager of Human Resources (Labour Relations), or delegate;
 - 7.1.3. Senior Superintendent of Human Resources;
 - 7.1.4. Senior Superintendent of Corporate Services and Treasurer; and
 - 7.1.5. Director of Education
- 7.2. The Manager of Business Services, or above, will be notified of reports involving Fraud relating to any TVDSB employee excluding Senior Administration.
- 7.3. The Manager of Human Resources (Labour Relations), or above, will be notified of reports involving all cases of alleged Wrongdoing other than Fraud relating to any TVDSB employee excluding Senior Administration.
- 7.4. If, based on the report submitted, any of the individuals with access to the Anonymous Reporting Tool are suspected, the next individual listed in the reporting chain will be notified, and access to the report will be restricted to that level and above, per below:
- 7.4.1. A report which the Manager of Business Services is suspected, will be sent to the Senior Superintendent of Corporate Services and Treasurer;
 - 7.4.2. A report which the Manager of Human Resources (Labour Relations) is suspected, will be sent to the Senior Superintendent of Human Resources;
 - 7.4.3. A report which a member of TVDSB Senior Administration, excluding the Director of Education, is suspected, will be sent to the Director of Education.
- 7.5. All reports relating to the Director of Education or a Trustee will be shared directly and exclusively with the External Parties.
- 7.6. TVDSB employees or a Trustee with knowledge of the report shall keep all aspects of the report confidential, unless through the course of their work they must disclose details of the report for its investigation and/or closure.
- 7.7. Reports of alleged Wrongdoing will be archived following the TVDSB Retention Schedule.

8. Instances of Alleged Fraud

- 8.1. The steps to follow for submitting a report about alleged fraud are outlined in the TVDSB Fraud Prevention and Management Procedure (1008a).

9. Instances of Alleged Wrongdoing Other Than Fraud

- 9.1. The steps to follow for a report submitted regarding alleged Wrongdoing excluding Fraud are included in;
 - 9.1.1. TVDSB Harassment Policy (3004) and Procedure (3004a),
 - 9.1.2. TVDSB Progressive Discipline of Employees Policy (3012) and Procedure (3012) or
 - 9.1.3. The professional association or college related to the employee.

10. Concluding Activities

- 10.1. Once an investigation of the alleged Wrongdoing has concluded, the following actions shall be undertaken by the TVDSB employee who initially received the report, or the External Parties through the Anonymous Reporting Tool:
 - 10.1.1. Document with rationale and corrective action taken if the report was substantiated;
 - 10.1.2. Document with rationale if a report was found to be unsubstantiated; and
 - 10.1.3. Change the status of the report to "Closed".
 - 10.1.4. Documents will be retained as outlined in the TVDSB Retention Schedule

11. Monitoring and Review

- 11.1. Reports received through the Anonymous Reporting Tool will be summarized in a confidential annual summary report to the Audit Committee.

12. List of Appendices

- 12.1.1. Appednix A - Procedure Administrative Information

Appendix A – Procedure Administrative Information

Procedure Number:	9061
Procedure Owner:	Business Services and Human Resources
Effective Date:	Jan 12, 2026
Amendment Dates:	
Review Dates	
EIE Review Date:	May 21, 2025
Resources:	• The <i>Education Act</i>, RSO 1990, c E.2 • TVDSB Fraud Prevention and Management Policy (1008) and Procedure (1008a) • TVDSB Privacy and Records Information Management Policy (2014) and Procedure (2014a) • TVDSB Resolving Public Concerns and Complaints Procedure (2030a) • TVDSB Harassment Policy (3004) and Procedure (3004a) • TVDSB Progressive Discipline of Employees Policy (3012) and Procedure (3012a) • TVDSB Employee Code of Conduct Policy (3017) and Procedure (3017a) • TVDSB Board Bylaws • TVDSB Retention Schedule