



WHISTLE BLOWER POLICY

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Policy Sponsor:	Administration	Last Revised:	
Primary Contact:	Executive Director	Review Scheduled:	07-2027
Approver:	Chief and Council BCM WFN 26/26-07-102		

PURPOSE

The purpose of this Policy is to establish a confidential, fair, and consistent process for reporting, investigating, and addressing suspected wrongdoing within Wahnapitae First Nation (WFN). WFN is committed to promoting integrity, accountability, transparency, and ethical conduct across all aspects of its governance, administration, programs, services, and operations. Individuals who report suspected wrongdoing in good faith will be protected from retaliation or reprisal, and all reports will be investigated in a timely, impartial, and confidential manner, with appropriate corrective action taken where wrongdoing is substantiated.

SCOPE

This Policy applies to all individuals acting on behalf of WFN, including Chief and Council, the Executive Director, Managers, Directors, Employees, Contractors, Consultants, Committee Members appointed by WFN, and Registered Members of WFN where they are acting in relation to WFN governance, programs, services, operations, or business activities.

This Policy applies to all WFN departments, programs, services, projects, facilities, entities, and operations. It governs the reporting, investigation, and resolution of suspected wrongdoing that occurs in connection with WFN activities, regardless of where the conduct takes place.

DEFINITIONS

Good Faith

A report made honestly and based on a reasonable belief that wrongdoing has occurred, is occurring, or is likely to occur.

Reprisal

Any adverse action taken against a person because they reported wrongdoing or participated in an investigation.

Reprisals may include, but are not limited to intimidation, harassment, threats, discrimination, loss of employment opportunities, suspension, demotion, termination, reduction of duties, or any other adverse treatment.

Wrongdoing

Wrongdoing includes any act or omission that is contrary to WFN laws, policies, procedures, ethical standards, or legal obligations.

Examples include, but are not limited to fraud, theft, misappropriation of funds or assets, financial irregularities, corruption or bribery; conflict of Interest violations, breaches of confidentiality, misuse of WFN property or resources, harassment, discrimination, or workplace misconduct, gross mismanagement, falsification of records, violations of health and safety requirements, violations of WFN policies or procedures, and illegal acts or activities.

POLICY STATEMENT

WFN is committed to maintaining a workplace and organizational culture founded on integrity, accountability, and ethical conduct. All individuals covered by this Policy are encouraged to report suspected wrongdoing as soon as reasonably possible. WFN will not tolerate wrongdoing or any form of retaliation or reprisal against a person who, in good faith, reports a concern, participates in an investigation, provides relevant information, or refuses to participate in wrongdoing. Any person found to have engaged in wrongdoing or retaliation may be subject to disciplinary or corrective action, up to and including termination of employment, cancellation of contracts, removal from committees or appointments, recovery of losses, or referral to law enforcement where appropriate.

REPORTING WRONGDOING

Reports may be made verbally or in writing. Reports may also be submitted anonymously.

Individuals are encouraged to provide as much information as possible, including:

- Description of the concern;
- Date(s) of occurrence;
- Names of individuals involved;
- Supporting documentation or evidence; and
- Names of potential witnesses.

REPORTING AVENUES

Reports may be submitted through any of the following channels:

Human Resources Manager

The Human Resources Manager shall serve as a designated recipient for reports of wrongdoing and may receive reports from Employees, Contractors, Committee Members, and Members.

Executive Director

The Executive Director shall serve as a designated recipient for reports of wrongdoing and may receive reports from Employees, Contractors, Committee Members, and Members.

Joint Reporting

Where practical and appropriate, reports received from Employees may be shared between the

Human Resources Manager and the Executive Director to ensure proper assessment, investigation, and resolution, unless doing so would create a conflict of interest or compromise the integrity of the investigation.

Complaints Involving the Human Resources Manager

Where the allegation involves the Human Resources Manager, the report shall be made directly to the Executive Director.

Complaints Involving the Executive Director

Where the allegation involves the Executive Director, the report shall be made directly to the Chief. The Chief shall promptly notify Council and may recommend the appointment of an external investigator.

Complaints Involving the Chief

Where the allegation involves the Chief, the report shall be submitted directly to Council. The Chief shall not participate in any review, discussion, investigation, or decision-making process relating to the complaint. Council may appoint an external investigator to conduct an independent investigation.

Complaints Involving a Councillor

Where the allegation involves a Councillor, the report shall be submitted to the Chief and Council. The Councillor who is the subject of the complaint shall not participate in any review, discussion, investigation, or decision-making process relating to the complaint.

External Investigator

Chief and Council may appoint an independent third-party investigator where:

- The matter involves senior leadership;
- A conflict of interest exists or may reasonably be perceived to exist;
- Specialized expertise is required;
- The matter involves allegations of serious misconduct; or
- An independent investigation is otherwise in the best interests of WFN.

CONFIDENTIALITY

WFN is committed to protecting the privacy and confidentiality of individuals who report suspected wrongdoing, as well as those who participate in an investigation. All reports will be handled in a discreet and confidential manner, and information will only be shared with individuals who require it to properly assess, investigate, or resolve the matter.

Information may be disclosed where necessary to conduct a fair and thorough investigation, comply with applicable laws or legal obligations, protect the safety of individuals or WFN property, or implement appropriate corrective or disciplinary action.

While WFN will make every reasonable effort to maintain confidentiality throughout the reporting and investigation process, absolute confidentiality cannot be guaranteed where disclosure is required to ensure procedural fairness, fulfill legal obligations, or effectively investigate and resolve the matter.

INVESTIGATION PROCESS

Upon receiving a report, the designated recipient shall:

- Acknowledge receipt of the complaint where possible;
- Conduct a preliminary assessment;
- Determine whether an investigation is warranted;
- Secure relevant records and evidence;
- Take reasonable steps to protect affected individuals; and
- Initiate an investigation as soon as reasonably practicable.

Investigations may be conducted internally or by an external investigator appointed by WFN.

Individuals who are the subject of a complaint shall be provided an opportunity to respond to allegations before findings are finalized.

Investigations shall be conducted fairly, impartially, and in accordance with principles of procedural fairness.

OUTCOMES AND CORRECTIVE ACTION

Where wrongdoing is substantiated, WFN may implement corrective measures including:

- Training;
- Coaching;
- Written warnings;
- Suspension;
- Termination of employment;
- Removal from committees or appointments;
- Contract termination;
- Recovery of funds or assets;
- Policy amendments;
- Referral to law enforcement authorities; or
- Any other appropriate action.

Corrective action shall be proportionate to the nature and severity of the wrongdoing.

FALSE OR MALICIOUS REPORTS

WFN encourages reporting in good faith. Individuals who knowingly make false, misleading, or malicious allegations may be subject to disciplinary action or other appropriate corrective measures.

A report that is made in good faith will not be considered false simply because the allegation is not substantiated.

PROTECTION FROM REPRISAL

No person shall be subjected to retaliation or reprisal for reporting wrongdoing in good faith.

Any allegation of reprisal shall be investigated promptly and independently.
Confirmed acts of reprisal shall be considered a serious breach of this Policy and may result in disciplinary action.

RECORDS MANAGEMENT

All reports, investigations, findings, and related records shall be maintained in a secure and confidential manner in accordance with applicable WFN policies and records management requirements.

Access shall be limited to individuals with a legitimate need to know.

ANNUAL REPORTING

The Executive Director and Human Resources Manager shall provide Chief and Council with an annual confidential report on the administration of this Policy. The report shall not contain personal information or identify complainants, witnesses, or respondents unless required by law.

The report may include a summary of the number and types of complaints received, investigations conducted, findings, corrective actions taken, reprisal complaints, emerging trends, and any recommendations to improve WFN policies, procedures, or practices.

REVIEW, AMENDMENTS, AND REVISION HISTORY

This Policy shall be reviewed annually to ensure it remains effective, relevant, and consistent with operational requirements and applicable legislation.

Minor or administrative amendments to this policy that do not alter its intention or core criteria may be made with the approval of the Executive Director, without requiring formal review or approval by Chief and Council.

REVISION HISTORY

Date (mm/dd/yyyy)	Band Council Motions

Appendix A - Whistleblower Report Form

Name (Optional):

Contact Information (Optional):

Date of Report:

Description of Concern:

Individuals Involved:

Witnesses:

Supporting Documents Attached: Yes / No

Remain Anonymous: Yes / No

Appendix B - Investigation Tracking Form

File Number:

Date Received:

Investigator:

Allegation Summary:

Actions Taken:

Findings:

Corrective Actions:

Date Closed: