

Public Interest Disclosure (Whistleblower Protection)



July 2026

Background

Prairie Land Public School Division maintains a positive working environment for all employees and a culture characterized by integrity, respect, trust and care, and expects all staff to demonstrate high ethical standards in their work. Prairie Land Public School Division will act in an objective manner to address reports of wrongdoing within Prairie Land Public School Division without retribution to Prairie Land Public School Division employees who report wrongdoing in good faith.

The purpose of this Procedure is to:

- Deter and detect wrongdoing within Prairie Land Public School Division in order to positively impact the reputation, effectiveness and finances of Prairie Land Public School Division and enhance the working environment for Prairie Land Public School Division employees.
- Provide clear guidance for the safe disclosure of any wrongdoing occurring within the Prairie Land Public School Division.
- Protect from retaliatory action any Prairie Land Public School Division employee who in good faith discloses wrongdoing occurring within the Prairie Land Public School Division.
- Manage, investigate and make recommendations respecting disclosures of wrongdoing and reprisals.

Protection from retaliation is also known as “whistleblower” protection.

All staff have a fiduciary responsibility to work in the best interests of the Division and to use all available resources in the achievement of the Division’s mission.

To this end, all staff shall conduct themselves, personally and professionally, in a highly ethical manner so as not to bring the Division or other staff into public disrepute or ridicule.

All staff shall refrain from using their position to benefit either themselves or any other individual or agency apart from the total interest of the Division.

Procedures

1. Designation of Chief Officer

- 1.1 The Superintendent is designated as the Chief Officer for the purpose of the overall administration and reporting required under the *Public Interest Disclosure (Whistleblower Protection) Act*.

2. Designation of Designated Officer

2.1 The Secretary–Treasurer is designated as the Designated Officer for the purpose of administering and investigating disclosure under the *Public Interest Disclosure (Whistleblower Protection) Act*.

3. Application of This Human Resources Procedure

3.1 This Human Resources Procedure applies to wrong doing related to Prairie Land Public School Division employees in all Division Buildings (including schools, Division Central Office, etc.) that involve:

3.1.1 A contravention of an *Act* of Alberta or Canada or the regulations related to those acts.

3.1.2 An act or omission that creates:

3.1.2.1 Substantial and specific danger to the life, health and safety of individuals other than a danger that is inherent in the performance of duties or functions of an employee.

3.1.2.2 Substantial and specific danger to the environment.

3.1.3 Gross mismanagement of public funds or a public asset.

3.1.4 Knowingly directing or counseling an individual to commit any form of wrongdoing.

4. No Reprisals

4.1 An employee, who in good faith seeks advice about making a disclosure, makes or made a disclosure, cooperated in an investigation and/or declined to participate in a wrongdoing will not be subject to actions or threats of dismissal, layoff, suspension, demotion, transfer, discontinuation or elimination of a job, change of job location, reduction in wages, change in hours of work, or reprimand, or any other measure that adversely affects the employee's employment or working conditions.

4.2 An employee may make a written complaint to the Public Interest Commissioner if the employee alleges that a reprisal has been taken or directed against the employee. Such a written complaint must, according to the *Public Interest Disclosure (Whistleblower Protection) Act*, be made on the following website: <https://yourvoiceprotected.ca/complaint-checker/>

4.3 Any Prairie Land Public School Division employee who is found to have taken retribution against an individual who has disclosed wrong doing or knowingly made malicious, misleading or false disclosure are subject to appropriate disciplinary action up to and including termination of contractual relationship, termination of employment and/or loss of privilege/appointment, as would be

the case with any other disciplinary action.

- 4.4 Reasonable human resource management decisions made in good faith do not constitute a reprisal.

5. Disclosure

- 5.1 Any Prairie Land Public School Division employee considering making a disclosure may request information or advice from the employee's Designated Officer, Chief Officer or the Public Interest Commissioner.
- 5.2 The Designated Officer, the Chief Officer or the Public Interest Commissioner may require a request for information or advice to be in writing.
- 5.3 Disclosures of wrongdoing must be made to the Designated Officer in writing.
- 5.4 The *Public Interest Disclosure (Whistleblower Protection)* Act outlines the information required in a disclosure.
- 5.5 Any Prairie Land Public School Division employee may also contact the Office of the Public Interest Commissioner to advise they have made a disclosure to their Designated Officer for the purposes of commencing an investigation.
- 5.6 Disclosures should be factual rather than speculative and contain as much specific information as possible.
- 5.7 In the event that disclosure to the Designated Officer is not appropriate due to conflict of interest with respect to the nature of the disclosure or the person involved, disclosure may be made to the Chief Officer.
- 5.8 Employees can disclose directly to the Public Interest Commissioner, circumventing their Chief Officer and their Designated Officer, in the following circumstances:
 - 5.8.1 If the employee has made a disclosure in accordance with the Procedures in this section and an investigation concerning the disclosure has not been completed in accordance with this section.
 - 5.8.2 If the employee has made a disclosure in accordance with the Procedures in this section and the matter has not been resolved within the time periods established in this section.
 - 5.8.3 If the employee has made a disclosure in accordance with the Procedures in this section, the investigation has been completed, a final decision has been issued relative to the disclosure and the employee is dissatisfied with the decision.
 - 5.8.4 If the subject matter of the disclosure involves the employee's Chief Officer or Designated Officer.

- 5.8.5 If the employee has made a disclosure to their Designated Officer and is unable to complete the Procedures because of reprisal directed towards them, or reasonably believes a reprisal is likely to be taken or directed towards them if the disclosure is made in accordance with this section.
- 5.9 Disclosures of matters dealing with “imminent risk” (matters that require immediate attention as they pose a specific risk to public health or safety, or a danger to the environment) must be made directly to the Public Interest Commissioner, who will then communicate with appropriate authorities.
- 5.10 The employee must also disclose the wrongdoing to the Designated Officer as soon as practicable thereafter.
- 5.11 When required, the Designated Officer will request advice from the Public Interest Commissioner with respect to the management and investigation of a disclosure.
- 6. Confidentiality
 - 6.1 Maintaining confidentiality is paramount to the success of the process.
 - 6.2 Accordingly, the risk of confidentiality will be strictly managed from the outset of a disclosure being received through to the end of the investigation and report release.
 - 6.3 In order to enhance confidentiality, as few people as are required will handle disclosures.
 - 6.4 Employees must not share information or evidence regarding disclosures or wrong doing with fellow employees who do not have a need to know such information and who are not authorized to address disclosures.
 - 6.5 All participants in an investigation shall keep confidential:
 - 6.5.1 The identity of individuals involved in the disclosure process.
 - 6.5.2 The identity of individuals alleged to have committed the wrongdoings.
 - 6.5.3 The identity of witnesses.
 - 6.5.4 The information collected in relation to a disclosure.
 - 6.5.5 The details and results of the investigation provided.
 - 6.5.6 Confidentiality may not be maintained for matters which pose an imminent risk of a substantial and specific danger to life, health or safety of individuals, or to the environment.
 - 6.6 Confidentiality is also subject to the provisions of the Protection of Privacy Act (POPA) and other legislation.

7. Investigations

- 7.1 Upon receiving a disclosure, the person receiving the disclosure shall determine whether or not an investigation is warranted.
- 7.2 An investigation may involve both internal and external sources to assist in determining whether an improper activity has occurred and what corrective action may be appropriate.
- 7.3 Where a disclosure received by the Designated Officer would, in the view of the Designated Officer, be more appropriately dealt with by the Public Interest Commissioner or by another department, public entity or Office of the Legislature, the Designated Officer shall refer such disclosure to the Public Interest Commissioner or the Chief Officer or designated officer of such department, entity or office within fifteen (15) business days of receipt.
- 7.4 The employee or other person making the disclosure will be advised by the Designated Officer about the referral.
- 7.5 Investigations shall be conducted in accordance with the principles of fairness and natural justice.
- 7.6 A single investigation may be conducted in circumstances where multiple disclosures are made on the same matter.
- 7.7 If during an investigation the Designated Officer has reason to believe that another wrongdoing has been committed or may have been committed the Designated Officer may investigate that wrong doing in accordance with this Procedure.

8. Timelines

- 8.1 A disclosure of wrongdoing or complaint of reprisal shall be acknowledged not more than five (5) business days from the date on which the disclosure of wrongdoing or complaint of reprisal is received.
- 8.2 The employee who submitted a disclosure or complaint of reprisal shall be advised no more than ten (10) business days from the date on which the disclosure of wrongdoing or complaint of reprisal is received of whether an investigation will be made.
- 8.3 An investigation must be concluded not more than three (3) months or sixty (60) business days from the date on which the disclosure of wrongdoing or complaint of reprisal is received.
- 8.4 The employee who submitted a disclosure of wrongdoing or complaint of reprisal shall be advised of the result of the investigation in writing.
- 8.5 These timelines may be extended by up to thirty (30) days by the

Superintendent, or for a longer period of time if approved by the Public Interest Commissioner.

9. Reporting

- 9.1 The Chief Officer must prepare a report annually on all disclosures that have been made to the Designated Officer.
- 9.2 Details of all disclosures will be compiled and tracked by the Designated Officer and provided to the Chief Officer.
- 9.3 Annual reports by the Chief Officer will include the following:
 - 9.3.1 The number of total disclosures received by the Designated Officer.
 - 9.3.2 The number of disclosures acted upon.
 - 9.3.3 The number of disclosures not acted on by the Designated Officer.
 - 9.3.4 The number of investigations commenced by the Designated Officer as a result of disclosures
- 9.4 In the case of an investigation that results in a finding of wrongdoing, a description of the wrongdoing and any recommendations made or corrective measures taken in relation to the wrongdoing or the reasons why no corrective measure was taken.

10. Good Faith

- 10.1 An employee who submits a disclosure of wrongdoing or complaint of reprisal must act in good faith.

11. Outcomes

- 11.1 Outcomes will be fair and reasonable for all persons involved. Following the complete investigation of a disclosure, outcomes which may result include:
 - 11.1.1 An Explanation.
 - 11.1.2 An Apology.
 - 11.1.3 Mediation.
 - 11.1.4 An Admission of Fault.
 - 11.1.5 A Change in a Decision.
 - 11.1.6 A Change to Policy, Procedure or Practice.
 - 11.1.7 A Change to the Relevant Law.
 - 11.1.8 A correction of misleading records.
 - 11.1.9 Financial Compensation, Including a Refund of any Fees.

11.1.10 The Waiving of a Debt.

11.1.11 The Remission of a Penalty.

11.1.12 Protection to the Employee Making the Disclosure.

11.1.13 Disciplinary Action.

11.1.14 Referral of a Matter to an External Agency for Further Investigation or Prosecution.

Reference: *Public Interest Disclosure (Whistleblower Protection) Act*

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