

**TORONTO REFUGEE COMMUNITY NON-PROFIT
HOMES & SERVICES - ROMERO HOUSE**



WHISTLEBLOWER POLICY

Approved by the Board of Directors:

April 26, 2021

Date

Chair of the Board:

Lorraine Neale

Signature

Romero House Whistleblower Policy

A. INTRODUCTION

Romero House is committed to operating with maximum integrity and by achieving full compliance with all applicable laws, rules, and regulations.

In line with this commitment, Romero House provides an anonymous avenue for employees, workers, volunteers, Board members, community members, other stakeholders and the general public (from now on referred to as “stakeholders”) to raise any concerns about the subjects covered by this policy and to be reassured that in making allegations they will be protected from reprisal or victimization for raising their concerns in good faith.

B. SCOPE

The policy applies to all current and former volunteers/workers/staff and board members of Romero House.

C. POLICY

1. This policy covers instances where stakeholders have evidence of activity ("Reportable Activity") by any of the other stakeholders that to their knowledge constitutes:
 - Accounting, auditing, or other financial reporting fraud or misrepresentation;
 - Violations of federal or provincial laws that could result in fines or civil damages payable by Romero House, or that could otherwise significantly harm Romero House's reputation or public image;
 - Unethical conduct in violation of any Romero House policy
 - Danger to the health, safety, or well-being of the stakeholders
 - Retaliation or Retribution Against an Individual Who Reports a Concern.
2. Allegations that are not made in good faith will be viewed as a serious offence and may be subject to discipline up to and including discharge in the case of employees, and/or the severing of the relationship with volunteers, suppliers, or other stakeholders.
3. Romero House will not permit the stakeholders to harass, retaliate or discriminate against those other stakeholders (the Complainant) who, in good faith, report a Reportable Activity. Retaliation in any form will not be tolerated and should be reported.
4. Any violation of this policy may subject the violator to disciplinary action, which may include, in appropriate circumstances, termination of employment or legal action.
5. If the stakeholders have a reasonable belief that a stakeholder has engaged in Reportable Activity, they are expected to immediately report such information. (See Appendix A: Whistleblower Reportable Activity Steps)

6. All reports will be followed up promptly, and an investigation conducted with all parties being treated fairly and equitably and in line with existing policies and procedures, and corrective action taken where warranted. In conducting its investigations, Romero House will strive to keep the identity of the Complainant as confidential as possible, while conducting an adequate review and investigation.

7. Romero House encourages notifications of reportable activity and will not retaliate against the stakeholder because the Complainant reports what the stakeholder believes in good faith to be fraud, a violation of the law, unethical conduct contravening Romero House policy, or a danger to health and safety.

8. This policy is not meant to deal with frivolous, inconsequential or clearly immaterial matters.

9. Changes can be made to Appendix A to be up-to-date and current without board approval.

D. Communication

The President of the Board is responsible for making sure familiarization with the whistleblower policy is part of Board orientation. The Director of Romero House is responsible for developing appropriate communications alerting all other stakeholders of the policy and reporting steps.

APPENDIX A: WHISTLEBLOWER REPORTABLE ACTIVITY STEPS

A Reportable Activity is one that to the whistleblower's knowledge constitutes:

- *Accounting, auditing, or other financial reporting fraud or misrepresentation;*
- *Violations of federal or provincial laws that could result in fines or civil damages payable by Romero House, or that could otherwise significantly harm Romero House's reputation or public image;*
- *Unethical conduct in violation of any Romero House policy*
- *Danger to the health, safety, or well-being of the stakeholders*
- *Retaliation or Retribution Against an Individual Who Reports a Concern.*

1. A report may be submitted in writing to the President of the Board or the Vice-President of the Board or the Director of Romero House. Employees are encouraged to follow channels through their supervisor first, unless they have reason to believe that they may be involved or that the reporting of the matter may adversely affect them, or are otherwise uncomfortable due to some aspect of the report.

2. The written statement should include the following information:

- a. Description of the reportable activity with as much detail and evidence as possible
- b. Date complainant became aware of the activity
- c. If the reportable activity is completed or on-going if known.
- d. Name of individual(s) suspected of the activity
- e. Steps taken (if any) prior to filing this reportable activity (i.e. spoke with supervisor)
- f. Any additional information that would assist Romero House in following up

3. If complainant provides contact information, receipt of the report will be sent by the same method.

4. Complainants are not required to prove the truth of an allegation, but are required to act in good faith, and to provide evidence to the person contacted in order to show that there are sufficient grounds for concern.

Reports can be made:

a. Via mail to the office in a sealed envelope marked CONFIDENTIAL to the attention, and only to be opened by, The President of the Board or to the Vice-President of the Board or to the Director of Romero House, 1558 Bloor St. West. Toronto, ON
OR

b. Via email to The President of the Board, RomeroHousePresident@gmail.com, or The Vice-President of the Board, RomeroHouseVicePresident@gmail.com or Romero House Director, Director@romerohouse.org. If an individual wishes to submit anonymously, they can create an anonymous email on a free email service (yahoo, gmail, etc) and send from that address.