

2.3.4 Whistleblowing

1. Statement of Intent

- 1.1. The FSA is committed to ensuring the highest level of integrity and ethical behaviour in all its operations.
- 1.2. The Whistleblower Policy is designed to ensure that all FSA members, Directors, and staff are encouraged to disclose concerns regarding possible wrongdoing, unethical behaviour, or actions by FSA Directors, staff, or contractors.
 - 1.2.1. Workplace wrongdoing includes but is not limited to financial misconduct, serious mismanagement, breaches of law, or other serious acts in the operation of the FSA that could cause significant harm to the integrity or reputation of the FSA. (Concerns regarding wrongdoing in BCIT's operations should be addressed according to the appropriate BCIT policies.)
- 1.3. Any FSA member, staff or contractor who, in good faith, raises a workplace related concern (referred to as a "Whistleblower") is to be protected by the FSA Board of Directors and management from retaliation, directly or indirectly, as a consequence of reporting the alleged misconduct. Retaliation against a person who, in good faith, has raised a concern or has participated in an investigation, will be subject to discipline up to and including termination of employment or contract with the FSA or being removed from their elected, selected, or appointed position.

2. Application

- 2.1. This policy applies to all FSA operations, including actions by:
 - 2.1.1. Directors and any FSA staff member, including any person employed by the FSA in a management capacity or who is an excluded employee;
 - 2.1.2. Any member elected, selected, or appointed by the FSA to represent the union, its members, or a group of members, including BCIT committee members and Tech Reps;
 - 2.1.3. Any person contracted to provide products or services to the FSA or on its behalf (a contractor).
- 2.2. Persons entitled to initiate submissions under this policy include:
 - 2.2.1. All FSA members, unless they are currently holding a position on the Board of Directors;
 - 2.2.2. Any FSA staff member or contractor, including managers, except as stipulated below;

2.2.3. Any person who interacts with the normal business of the FSA and their submission is concerning the FSA directly.

2.3. Members of the FSA Board of Directors are strongly encouraged to address their concerns directly with the FSA Board of Directors and/or the President as appropriate. However, members of the Board may make anonymous submissions of concern as per this policy if they feel that addressing directly with the Board or the President is not possible or feasible in the particular circumstances.

2.4. Any FSA manager with a concern about the actions of FSA staff or contractor under their direction shall address that concern by exercising their management rights.

2.5. Any BCIT manager with a concern shall have their concern addressed directly by the FSA President or Executive Director as appropriate.

3. Duties and Responsibilities

3.1. FSA Directors and staff shall take every concern about the ethics and integrity of FSA operations seriously and in accordance with the process set out below.

3.2. The FSA will post this policy on the FSA website and in the FSA office.

4. Process

4.1. The whistleblowing process may be initiated by any communication expressing a concern about the ethics and integrity of FSA operations to any FSA Director or manager. The Whistleblower should identify whether the matter qualifies as whistleblowing such that the FSA can ensure the processes in this policy are followed.

4.2. The recipient of such a concern shall direct the potential Whistleblower to this policy and shall advise the FSA management or the FSA President that they have received such information.

4.3. Anonymous concerns will be addressed according to the FSA's obligation to ensure the integrity and ethical operation of the organization even though a Whistleblower's choice to remain anonymous may limit the Association's ability to investigate and respond to the concerns.

4.4. The FSA will provide a mechanism for anonymous submission of concerns, and the mechanism will be widely publicized to all members.

4.5. The identity of a Whistleblower who identifies themselves in their submission will be kept confidential to the fullest extent possible, in accordance with conducting a thorough and proper investigation in which certain details may need to be disclosed on a need-to-know basis.

4.6. Should the Whistleblower take their concern public or otherwise compromise the processes in this policy, the FSA may, take steps to mitigate the impact of the publicity on the FSA. The Executive

Director, the President, or a Director designated for this purpose (the "Responding Officer") shall be responsible for responding to the concern on behalf of the Association.

- 4.7. Directors and FSA managers shall immediately forward any such public identified concerns to the Responding Officer.
- 4.8. A response to a Whistleblower submission shall be initiated within five working days of being received by the Responding Officer. Wherever possible, the Whistleblower that has brought forward a concern will be advised when a response is initiated.
- 4.9. The response shall include the initiation of an investigation appropriate to the identified concern.
 - 4.9.1. Usually, the Responding Officer will also act as Investigator.
 - 4.9.2. Certain circumstances such as the gravity of the allegation, the specialized nature of the subject matter, the individuals involved in the breach may warrant that the FSA engage an external advisor as Investigator.
 - 4.9.3. All FSA Directors, staff and contractors are expected to co-operate fully with the investigation, and the investigation shall be completed in a timely fashion while ensuring that due diligence and due process are followed.
 - 4.9.4. The FSA will not tolerate any form of reprisal or retaliation against an individual who makes a good faith disclosure under this policy. Concerns regarding possible reprisal or retaliation should be reported to the Responding Officer.
 - 4.9.5. The Investigator shall produce a confidential written report of the findings to be shared only with the Whistleblower (complainant), respondent, the Executive Director, and the Board of Directors.
- 4.10. Based on the findings of the investigation, the Responding Officer shall make recommendations to the Board of Directors to address the concern. The Board of Directors will determine the FSA's response to the concern
 - 4.10.1. Wherever possible, the Whistleblower shall be advised of the FSA response by the Responding Officer.
- 4.11. The Executive Director shall ensure that documents relating to whistleblowing concerns are kept on file by the FSA as per FSA Policy 3.3.3 - Records and Retention.

Revision History

Date	Revision (Brief description)
2026-04-15	Revisions approved
2025-08-25 to 2025-12-10	Rewrite of entire policy; template provided by the Tandem team and edits made by the ED/Board