

Category	Governance
Type	Policy
Title	Safe Disclosure
Approval Authority	Board of Governors of Banff Centre
Implementation Authority	President and CEO
Related Policy	N/A
Related Procedure(s)	Safe Disclosure (General Disclosures) Safe Disclosure (Serious Wrongdoing)
Related Additional Information	Safe Disclosure (Serious Wrongdoing) – Frequently Asked Questions (FAQs)
Original Approval Date	28/10/2016
Original Effective Date	08/12/2016
Most Recent Revision Date	n/a
Next Review Date	08/12/2019

PURPOSE

All members of **Banff Centre Community** have an obligation to conduct themselves in a manner that is consistent with **Banff Centre’s** stated values regarding ethical conduct. As part of this obligation, and to protect Banff Centre and individuals, all members of Banff Centre Community are encouraged to report conduct that does not meet Banff Centre’s ethical standards.

The purpose of this policy is to:

- Confirm the expectations concerning ethical conduct for members of Banff Centre Community
- Confirm the rights of individuals in reporting conduct that does not meet Banff Centre’s ethical standards
- Confirm Banff Centre’s obligation to protect person(s) making a **Good Faith Disclosure** from **Reprisal**
- Confirm Banff Centre’s obligation to protect the rights of the person(s) against whom allegations are made

SCOPE

Compliance with this Banff Centre policy extends to all members of Banff Centre Community following the related Procedures referred to herein.

POLICY STATEMENT

1. STANDARDS OF ETHICAL CONDUCT

All members of Banff Centre Community shall maintain the highest standards of ethical conduct (following the principles and values set out in Banff Centre's *Code of Ethics*), in which their actions and behaviors uphold the principles of integrity, respect and accountability, supported by awareness and compliance with relevant Banff Centre policies and procedures, collective agreements, government legislation and relevant professional standards.

2. FAILURE TO COMPLY

Failure to comply with this policy may result in disciplinary action, up to and including the termination of employment and prosecution if appropriate.

3. REPORTING

Members of Banff Centre Community are encouraged to report conduct that does not meet Banff Centre's ethical conduct standards. Such reports must meet the definition of **Good Faith Disclosure** and be submitted to the appropriate authority in the manner outlined in the procedures associated with this policy.

Banff Centre will maintain an environment free from Reprisal when a Good Faith Disclosure is made, in which:

- a. the persons and offices that receive and/or investigate such reports shall protect the identity of the person making the report to the extent possible under applicable legislation, Banff Centre policies and procedures, and collective agreements in effect at the time of the alleged misconduct;
- b. Banff Centre will not tolerate any Reprisal, directly or indirectly, against anyone who makes a Good Faith Disclosure; and
- c. all individuals against whom allegations are made will maintain the rights, privileges and protections afforded to them through the *Freedom of Information and Protection of Privacy (FOIP) Act* and other applicable legislation, Banff Centre policies and procedures, and collective agreements in effect at the time of the alleged misconduct.

4. RELATED POLICIES

- a. At any given time, there may be other Banff Centre policies and procedures in force that touch on ethical behavior. The absence of a particular policy or procedure covering a particular situation does not relieve an individual of the responsibility to apply the highest ethical standards in that situation.
- b. In the event there is no policy that addresses an ethical question that arises during the execution of their Banff Centre responsibilities, individuals may seek clarification or guidance from the Chair of the Audit and Finance Committee of Banff Centre, the President and CEO, the Vice-President, Administration and CFO or the Vice-President, Human Resources.

DEFINITIONS

Any definitions listed in the following table apply to this document only with no implied or intended institution-wide use.

Definition	Meaning
Approval Authority	The individual or entity with authority to approve this Policy
Banff Centre	Banff Centre for Arts and Creativity
Banff Centre Community	Persons associated with Banff Centre including: <ul style="list-style-type: none">• members of the Board of Governors of Banff Centre;• members of the Board of Directors of The Banff Centre Foundation;• members of the Senior Leadership Team;• staff, including sessional workers;• volunteers;• artists, including practicums;• others performing activities or providing goods or services at or under the auspices of Banff Centre, including consultants, guests, vendors, and contractors
Good Faith Disclosure	A submission of information, that is based on reasonable belief, and is not malicious, frivolous or vexatious, to the appropriate Banff Centre authority
Implementation Authority	The individual or entity with authority to implement this Policy and with responsibility for the matter that is the subject of this Policy (or his/her delegate)
Reprisal	Punitive action(s) taken against a person for making a Good Faith Disclosure, including, but not limited to: <ul style="list-style-type: none">• disciplinary action;• termination;• adversely affecting employment or working conditions; and or• a threat to do any of the above
Policy	A statement that regulates Banff Centre activities, operations, or structures and: <ul style="list-style-type: none">• establishes how Banff Centre conducts one or more aspects of its business;• sets out how Banff Centre expects Banff Centre Community members to conduct themselves generally or in particular circumstances;• sets Banff Centre objectives or direction in

	<p>order to establish a framework for Banff Centre decisions or actions; or</p> <ul style="list-style-type: none"> deals with compliance with laws, court orders, government policies or directives
Policy Office	The Policy Office at Banff Centre
Procedure	The statement of processes required to implement a Policy
Senior Leadership Team	The President and CEO, together with the Vice Presidents of Banff Centre

RELEVANT DOCUMENTS

- Relevant legislation:
 - *Freedom of Information and Protection of Privacy (FOIP) Act*
- Other relevant Banff Centre Policies/Procedures:
 - *Policy - Code of Ethics*
 - *Policy - Unlawful Activity*
 - *Policy – Anti-Harassment*
 - *Procedure - Safe Disclosure (General Disclosures)*
 - *Procedure - Safe Disclosure (Serious Wrongdoing)*
 - *Additional Information - Safe Disclosure (Serious Wrongdoing) – Frequently Asked Questions (FAQs)*

MODIFICATION HISTORY

- Original Approval Date: 28/10/2016
- Effective Date: 08/12/2016
- Subsequent Revision Dates:

CONTACT

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