

Category	Governance
Type	Procedure
Title	Safe Disclosure (General Disclosures)
Approval Authority	President and CEO
Implementation Authority	Vice President, Administration and CFO and Vice President, Human Resources
Related Policy	Safe Disclosure
Related Procedure(s)	Safe Disclosure (Serious Wrongdoing)
Related Additional Information	Safe Disclosure (Serious Wrongdoing) – Frequently Asked Questions (FAQs)
Original Approval Date	05/12/2016
Original Effective Date	08/12/2016
Most Recent Revision Date	n/a
Next Review Date	08/12/2019

PURPOSE

As noted in the *Policy – Safe Disclosure*, all members of **Banff Centre Community** are encouraged to report conduct that does not meet **Banff Centre’s** standards of ethical conduct. These standards reflect the principles and values set out in Banff Centre’s *Policy - Code of Ethics*. This Procedure sets out the steps individuals should take when reporting certain conduct that does not meet Banff Centre’s standards of ethical conduct.

SCOPE

Compliance with this Banff Centre procedure extends to all members of Banff Centre Community.

PROCEDURE

1. DISCLOSURE OF CONFLICT OF INTEREST AND/OR COMMITMENT
 - a. The terms “Conflict of Interest” and “Conflict of Commitment” are described in the *Policy - Code of Ethics*.
 - b. If any individual has a question or doubt about the appropriateness of an activity, he/she must refrain from participation in the activity of concern until all concerns relating to the conflict of interest and/or conflict of commitment are resolved.
 - c. Section 2 of the *Policy - Code of Ethics* sets out the disclosure procedures for individuals to follow should an actual or potential conflict of interest and/or commitment occur (unless the disclosure relates to an actual or potential **Serious Wrongdoing**, in which case, please refer to section 5 below).

2. DISCLOSURE OF VIOLATIONS OF *POLICY - CODE OF ETHICS*

- a. In cases where an individual has knowledge of an actual or potential violation of the *Policy - Code of Ethics*, the disclosure procedures set out in Section 2 of the *Policy - Code of Ethics* must be followed (unless the disclosure relates to an actual or potential Serious Wrongdoing, in which case, please refer to section 5 below).

3. DISCLOSURE OF VIOLATIONS OF *POLICY - ANTI-HARASSMENT*

- a. In cases where an individual has knowledge of an actual or potential violation of the *Policy – Anti-Harassment*, the disclosure procedures set out in that policy must be followed (unless the disclosure relates to an actual or potential Serious Wrongdoing, in which case, please refer to section 5 below).

4. DISCLOSURE OF VIOLATIONS OF *POLICY –UNLAWFUL ACTIVITY*

- a. In cases where an individual has knowledge of an actual or potential violation of the *Policy – Unlawful Activity*, the disclosure procedures set out in that policy must be followed (unless the disclosure relates to an actual or potential Serious Wrongdoing, in which case, please refer to section 5 below).

5. DISCLOSURE OF SERIOUS WRONGDOING

- a. Any Employee who has a concern regarding a Serious Wrongdoing should consult the alternative Banff Centre Procedure: *Procedure – Safe Disclosure (Serious Wrongdoing)* for guidance as to how to safely disclose such matters.

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 Procedure
Approval Date	The date on which this Procedure is approved for publication by the Approval Authority
Banff Centre	Banff Centre for Arts and Creativity
Banff Centre Community	Persons associated with Banff Centre including: <ul style="list-style-type: none">• Employees• 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

Effective Date	The date on which the approved Procedure is deemed to be effective. The default Effective Date shall be the Approval Date unless otherwise determined by the Approval Authority.
Employees	Individuals employed by Banff Centre, including: <ul style="list-style-type: none"> i. members of the Senior Leadership Team; and ii. staff, including sessional workers. For the purposes of this Procedure, Employees also includes members of the Board of Governors of Banff Centre and members of the Board of Directors of The Banff Centre Foundation.
Implementation Authority	The individual or entity with authority to implement this Procedure and with responsibility for the matter that is the subject of this Procedure (or his/her delegate).
Policy	A statement that regulates Banff Centre activities, operations or structures and: <ul style="list-style-type: none"> i. establishes how Banff Centre conducts one or more aspects of its business; ii. sets out how Banff Centre expects members of its community to conduct themselves generally or in particular circumstances; iii. sets Banff Centre objectives or direction in order to establish a framework for Banff Centre decisions or actions; and/or iv. 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. Not all Policies will necessarily require an associated Procedure.
Senior Leadership Team	The President and CEO, together with the Vice Presidents of Banff Centre.
Serious Wrongdoing	<ul style="list-style-type: none"> i. a contravention of an Act of Parliament or of the Legislature of Alberta, or of any regulations made under any such Act; ii. an act or omission that creates: <ul style="list-style-type: none"> a. a substantial and specific danger to the life, health or safety of individuals other than a danger that is inherent in the performance of the duties or functions of an Employee or b. a substantial and specific danger to the environment;

	<ul style="list-style-type: none"> iii. gross mismanagement of public funds or a public asset; or iv. knowingly directing or counseling an individual to commit a Serious Wrongdoing mentioned in clauses (i) to (iii).
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RELEVANT DOCUMENTS

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

MODIFICATION HISTORY

- Original Approval Date: 05/12/2016
- Effective Date: 08/12/2016
- Subsequent Revision Dates: n/a

CONTACT

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