Holy Spirit
CATHOLIC SCHOOL DIVISION

POLICY 21

Revised September 2026

PUBLIC INTEREST DISCLOSURE (WHISTLEBLOWER PROTECTION)

In compliance with Alberta's Public Interest Disclosure (Whistleblower Protection) Act ("PIDA"), Section 5(1), the Board has established written procedures for managing and investigating employee disclosures. PIDA aims to:

- Facilitate the reporting and investigation of significant matters within public bodies, including school boards, that may be unlawful, dangerous, or harmful to the public interest;
- Protect employees who make disclosures;
- Address disclosures and reprisals with proper investigation and recommendations; and
- Promote public confidence in public bodies administration.

Holy Spirit Catholic School Division is committed to ethical stewardship by responsibly managing resources, ensuring fact- and policy-based decision-making, promoting fairness and transparency, and operating in alignment with Catholic values.

The Board of Trustees upholds high standards of ethical conduct and accountability, aiming to prevent and detect wrongdoing to maintain public confidence. Employees are encouraged to report potential wrongdoing or seek advice without fear of retaliation. Clear reporting guidelines are provided, and all employees must report suspected wrongdoing to the Chief Officer or Designate.

These practices ensure adherence to PIDA requirements and reinforce the Board's commitment to ethical conduct and accountability.

Practices

1. Designation of Chief Officer

    1.1 The Superintendent of Schools is designated the Chief Officer for the purpose of the overall administration and reporting required under PIDA.

2. Designation of Designated Officer

    2.1 The Deputy Superintendent is designated the Designated Officer for the purpose of administering and investigating disclosures under PIDA.

3. Application of Policy

    3.1 This policy applies to wrongdoings in or relating to The Holy Spirit Roman Catholic Separate School Division, its schools, departments and employees. A wrongdoing is defined as the following:

        3.1.1 an illegal act;

        3.1.2 an act or omission that creates an imminent risk to the health and safety of individuals;

3.1.3 a specific threat to the environment;

3.1.4 gross mismanagement of public funds or a public asset; or

3.1.5 knowingly directing or counseling an individual to commit a wrongdoing mentioned in the above instances.

4. No Reprisals

4.1 An employee who, in good faith:

a. sought advice about making a disclosure;
b. made a disclosure;
c. co-operated in an investigation;
d. declined to participate in a wrongdoing; or
e. acted in accordance with this Act.

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 PIDA, be made on the Complaint of Reprisal Form. (http://www.pic.alberta.ca/files/Complaint-of-Reprisal-Form.pdf)

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

5. Disclosure

5.1 Disclosures of wrongdoing must be made to the Deputy Superintendent (the Designated Officer) in writing. The form Public Interest Disclosure Form outlines the information required in a disclosure.

5.2 In the event that disclosure to the Deputy Superintendent is not appropriate due to conflict of interest with respect to the nature of the disclosure or the person involved, the Designated Officer shall request the Chief Officer to designate an alternative Designated Officer for the disclosure. The alternative Designated Officer shall have all the powers of the Designated Officer for the purpose of the disclosure.

5.3 In the event of a disclosure to the Designated Officer concerning the conduct of the Chief Officer, or concerning which the Chief Officer has a conflict of interest, the Designated Officer shall:

5.3.1 advise the Board Chair of the nature of the disclosure, whereupon the Board of Trustees may authorize an investigation into the disclosure; and

5.3.2 advise the Commissioner of the disclosure and its referral to the Board of Trustees, and seek advice from the Commissioner concerning whether the disclosure should be referred to the Commissioner.

5.4 Disclosures of matters dealing with "imminent risk" (matters that require immediate attention as they pose significant 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 the appropriate authorities. The employee must also disclose the wrongdoing to the Deputy Superintendent, as soon as practicable thereafter. http://www.pic.alberta.ca/files/Online-Disclosure-Form.pdf

5.5 Anonymous disclosures may be dealt with, but an investigation maybe hampered by the request for anonymity.

6. Investigations

6.1 Upon receiving a disclosure, the person receiving the disclosure shall determine whether or not an investigation is warranted.

6.2 An investigation may involve both internal and external sources to assist in determining whether a wrongdoing has occurred and what corrective action may be appropriate.

6.3 Confidentiality of the disclosure or wrongdoing shall be maintained to the extent possible consistent with the need to conduct an adequate investigation.

6.4 Investigations shall be conducted in accordance with the principles of fairness and natural justice.

7. Timelines

7.1 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.

7.2 The employee who submitted a disclosure of wrongdoing 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.

7.3 An investigation must be concluded not more than 110 business days from the date on which the disclosure of wrongdoing or complaint or reprisal is received.

7.4 These timelines may be extended by up to 30 days by the Superintendent, or for a longer period of time if approved by the Public Interest Commissioner.

8. Report

8.1 The Designated Officer shall provide a written investigation report to the Chief Officer detailing whether the disclosure was substantiated, and providing recommendations on corrective action.

8.2 Where the Designated Officer is considering a recommendation to the Chief Officer that the Chief Officer exercise authority delegated to them by the Board of Trustees to suspend or terminate a teacher or administrative designation under the *Education Act*, the Designated Officer shall consult with other Board staff typically responsible for such recommendations concerning the necessary process. In such an event, the written investigation report shall be provided to the Superintendent in the course of any process under the *Education Act* for the Superintendent to consider that recommendation.

8.3 The Chief Officer shall consider the recommendations in the investigation report, and shall be responsible for determining what action, if any, including disciplinary action, shall be either taken as a result or recommended to the Board of Trustees. The Chief Officer shall follow-up with the employees responsible to ensure those actions are taken.

8.4 The person making the complaint shall be advised when the investigation is completed, the recommendations made in the written investigation report, and the Chief Officer's actions resulting from the written investigation report.

9. Good Faith

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

9.2 Deliberately false or malicious allegations by an employee will form the grounds for disciplinary action up to and including termination of employment.

References ***Public Interest Disclosure (Whistleblower Protection) Act (PIDA)***
Public Interest Disclosure (Whistleblower Protection) Regulation
http://www.qp.alberta.ca/1266.cfm?page=2013_071.cfm&leg_type=Regs&display=html
Section 67*, Education Act*