



REPORT TO

AUDIT COMMITTEE

WHISTLEBLOWER PROGRAM UPDATE

“Whatsoever thy hand findeth to do, do it with all thy might.”
Ecclesiastes 9:10

Created, Draft	First Tabling	Review
September 10, 2019	September 17, 2019	
D. Bilenduke, Senior Coordinator of Finance P. De Cock, Comptroller of Business Services & Finance		
INFORMATION REPORT		

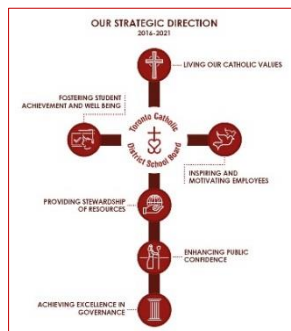
Vision:

At Toronto Catholic we transform the world through witness, faith, innovation and action.

Mission:

The Toronto Catholic District School Board is an inclusive learning community uniting home, parish and school and rooted in the love of Christ.

We educate students to grow in grace and knowledge to lead lives of faith, hope and charity.



Rory McGuckin
Director of Education

D. Koenig
Associate Director
of Academic Affairs

L. Noronha
Associate Director of Facilities,
Business and Community
Development, and
Chief Financial Officer

A. EXECUTIVE SUMMARY

In September 2018, the Board created a Whistleblower Policy, A.39, attached as Appendix A. The operating procedures to this policy are attached as Appendix B. The Board's message on integrity for both internal and external stakeholders is as follows: *"Toronto Catholic District School Board's goal is to ensure that its employees, internal and external stakeholders observe the highest standards of ethics in the conduct of their duties and responsibilities, practice honesty and integrity in fulfilling their responsibilities, and comply with all applicable laws and regulations. All employees, internal and external stakeholders are bound to the Board's Policy Code of Conduct, and are urged to report violations or suspected violations of the Code, and/or other possible legal and ethical lapses. If you suspect a violation, you can communicate it anonymously."*

To facilitate this anonymous communication, a third party vendor, Integrity Counts, has been contracted to administer the process. The following details the communication and internal process at the Board to maintain a high level of integrity and perception.

The cumulative staff time required to prepare this report was 3 hours.

B. PURPOSE

1. This report is required for members of the Audit Committee to understand the due diligence and integrity of the Board's Whistleblower process.
2. The policy requires that the Audit Committee receive quarterly and annual progress reports for review.

C. BACKGROUND

1. The Whistleblower Policy (A.39) and Operational Procedures drafted and submitted to the Governance and Policy Committee meeting on September 12th 2017 for consideration and review, supports the Board's commitment to integrity and accountability. A framework for the disclosure and investigation of wrongdoing, as well as protection from reprisal or threat of reprisal for those who make disclosures of information facilitates this commitment.

2. TCDSB stakeholders were invited to participate in the community consultation regarding the Whistleblower Policy (A.39) as part of the Board's commitment to protect the public interest and trust in public education by providing a framework for the disclosure and investigation of wrongdoing, as well as protections from reprisal or threat of reprisal for those who make disclosures of information.
3. A dedicated Community Consultation micro-website was developed to capture feedback via an online survey from May 1st 2018 to May 22nd 2018.
4. Prior to the online web-based consultation, a series of discussions initiated by the Senior Coordinator Academic Services, Human Resources invited input on the draft Whistleblower Policy (A.39) at meetings scheduled between February and April 2018 with the TCDSB's major employee and administrative groups, as well as employee unions.
5. The Board of Trustees approved the TCDSB Whistleblower Policy and Procedures on September 20th 2018 as recommended by the Governance and Policy Committee.

D. EVIDENCE/RESEARCH/ANALYSIS

Communication

1. The Board purchased 250 posters, Appendix C and 12,000 wallet cards, Appendix D. The posters and wallet cards were distributed to our schools for the opening day with instructions to display the posters in a prominent location and distribute the cards to all staff.
2. A message introducing the system has been sent to everyone on the Board's email exchange. A copy is attached as Appendix F.
3. A message was drafted to parents with instructions for schools to distribute via their messenger service.
4. A "Speak Up" button has been added to Board and School websites that directs individuals to the Integrity Counts reporting system.

Board Administration

1. Integrity Counts is the independent third party who are the initial contact for all complaints. They will forward each case to the Board based on the wishes of the complainant. Some informants may wish to remain anonymous and others may want follow up, etc.
2. The Board has created a workflow chart to receive and determine the distribution of each case from Integrity Counts. A 2-day turnaround has been established for the case to be addressed and a plan of action formulated. The workflow is attached as Appendix E.
3. The Board's Case Manager (Supervisor for Legal Support reporting to the Board's General Legal Counsel) will be responsible for assigning and tracking each case to its completion and providing any feedback to informants.

E. METRICS AND ACCOUNTABILITY

1. Complaints that are found to have merit will be addressed and incorporated into the day-to-day operations and internal controls of the TCDSB.
2. Policy A.39 requires:
"The effectiveness of the policy will be determined by measuring the following:
 - 1. A report of the number and classification of disclosures of information and substantiation of reports and concerns including themes regarding the concerns shall be provided to the Board and Audit Committee quarterly.*
 - 2. A survey will be distributed annually to TCDSB internal and external stakeholders to assess satisfaction with the Whistleblower policy and its operational procedures. The results of this survey will be reported to the Board and the Audit committee on an annual basis."*
3. Ad hoc reports are available from the Integrity Counts system, as required, to assist with all levels of reporting needs.

F. CONCLUDING STATEMENT

This report is for the consideration of the Audit Committee.