



Whistleblower Policy

Policy Statement

The Betting, Gaming and Lotteries Commission is committed to lawful and ethical behavior in all of its activities and requires directors, managers and employees to act in accordance with all applicable laws, regulations and policies and to observe high standards of business and personal ethics in the conduct of their duties and responsibilities.

Scope

This policy aims to:

- Encourage you to feel confident in raising serious concerns and to question and act upon concerns about practice;
- Provide avenues for you to raise those concerns and receive feedback on any action taken;
- Ensure that you receive a response to your concerns and that you are aware of how to pursue further action if you are not satisfied; and
- Reassure you that you will be protected from possible reprisals or victimization if you have a reasonable belief that you have made any disclosure in good faith.

There are existing procedures in place to enable you to lodge a grievance relating to your own employment. The whistle-blowing policy is intended to cover major concerns that fall outside the scope of other procedures. These include:

- Conduct which is an offence or a breach of law;
- Disclosures related to miscarriages of justice;
- Health and safety risks, including risks to the public as well as other employees;
- Damage to the environment;
- Unauthorized use of organization funds;
- Possible fraud and corruption;
- Sexual or physical abuse of young people, volunteers or staff; and
- Other unethical conduct.

Any serious concerns that you have about any aspect of service provision or the conduct of staff of the Commission or others acting on its behalf can be reported under the whistle-blowing policy. This may be about something that:

- Makes you feel uncomfortable in terms of known standards, your experience or the values you believe the centre subscribes to; or
- Is against the centre's policies and procedures; or
- Falls below established standards of practice; or
- Amounts to improper conduct.

Reporting Responsibility

Each Reporting Individual has an obligation to report what he or she believes is a material violation of law or policy or any questionable accounting or auditing matter by the Commission, its officers,

directors, employees, agents or other representatives. Reporters must also notify the Commission if an action needs to be taken in order for the Commission to be in compliance with law or policy or with generally accepted accounting practices. The types of concerns that should be reported include, for purposes of illustration and without being limited to, the following:

- providing false or misleading information on the Commission's financial documents, tax returns or other public documents
- providing false information to or withholding material information from the Commission's auditors, accountants, lawyers, Commissioners or other representatives responsible for ensuring compliance with fiscal and legal responsibilities
- embezzlement, private benefit, or misappropriation of funds
- material violation of policy; including among others, confidentiality, conflict of interest, accepting bribes, document retention

Reporting Concerns

Employees

Whenever possible, employees should seek to resolve concerns by reporting issues directly to his/her manager or to the next level of management as needed until matters are satisfactorily resolved. However, if for any reason an employee is not comfortable speaking directly to their manager or does not believe the issue is being properly addressed, the employee may contact the director of Human Resources, the Director of Enforcement, the Director of Legal Services, or the Executive Director. If an employee does not believe that these channels of communication can or should be used to express his/her concerns, an employee may contact the Chairman of the Board of Commissioners or the Ministry of Finance directly. Whenever practical, reports should be in writing.

Directors

Directors and Commissioners may submit concerns to the Executive Director, the Director of Legal Services or directly to the Chairman of the Board. If the volunteer or director is not comfortable reporting to any of these individuals or if he/she does not believe the issue is being properly addressed, the individual may report directly to Ministry of Finance. Whenever practical, reports should be in writing.

Individuals submitting reports can do so named or anonymously. Because it is impossible to seek additional information from an anonymous individual, it is essential that such reports contain as much specific information as possible.

Handling of Reported Violations

The Commission will investigate all reports filed in accordance with this policy with due care and promptness. The Commission will notify the person who submitted a complaint, if named, and acknowledge receipt of the reported violation or suspected violation.

All matters will be investigated by the Executive Director of the Commission to determine if the allegations are true, whether the issue is material and what actions, if any, are necessary to correct the problem. The Executive Director will notify the Commission's Chairman of any such investigation. After the conclusion of the investigation the Executive Director will present the findings to the Board of Commissioners who will then determine what actions are necessary.

No Retaliation

This Whistleblower Policy is intended to encourage and enable all members of the Commission to raise serious concerns within the organization for investigation and appropriate action. With this goal in mind, no director, manager or employee who, in good faith, reports a Concern shall be threatened, discriminated against or otherwise subject to retaliation or, in the case of an employee, adverse employment consequences as a result of such report. Moreover, any member of staff who retaliates against someone who has reported a concern in good faith is subject to discipline up to and including dismissal from the volunteer position or termination of employment.

Acting in Good Faith

Anyone reporting a Concern must act in good faith and have reasonable grounds for believing the matter raised is a serious violation of law or policy or a material accounting or auditing matter. The act of making allegations that prove to be unsubstantiated, and that prove to have been made maliciously, recklessly, with gross negligence, or with the foreknowledge that the allegations are false, will be viewed as a serious disciplinary offense and may result in discipline, up to and including termination of employment. Depending on the circumstances, such conduct may also give rise to other actions, including civil or criminal lawsuits.

Confidentiality

Reports of concerns and investigations shall be kept confidential to the extent possible. However, consistent with the need to conduct an adequate investigation, the Commission cannot guarantee complete confidentiality. Disclosure of information relating to an investigation under this policy by Commission staff, directors, or others involved with the investigation to individuals not involved in the investigation will be viewed as a serious disciplinary offense and may result in discipline, up to and including termination of employment. Depending on the circumstances, such conduct may also give rise to other actions, including civil or criminal lawsuits.