

## **Policy Direction – Leadership Volunteer and Employee Disclosure and Protection**

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### **Rationale and Relationship to Mission, Principles and Values**

The Multiple Sclerosis Society of Canada (MS Society) requires volunteers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities toward fulfilling the mission of the MS Society. The MS Society's organizational values include the demonstration of ethical behaviour and integrity and adherence to the highest standards of quality, transparency and accountability. Volunteers, especially those in leadership positions, and employees are expected to practice honesty and integrity in fulfilling those responsibilities and to comply with all applicable laws and MS Society policies.

### **Policy Objective**

The objective of the policy is to make clear the responsibility of all leadership volunteers\* and employees to bring forward a reasonable belief that serious violation or wrongdoing has occurred or is about to occur within the MS Society and to provide a process by which such reasonable beliefs can be reported. It protects from reprisal those who come forward in good faith; it provides a fair and objective process to investigate those who are suspected of violation or wrongdoing and it protects the confidentiality of all involved in the disclosure process. This policy direction is not intended to deal with harassment or discrimination issues which are covered under the MS Society's Workplace Relationship Policy Direction.

### **Policy Application**

The policy applies to all MS Society leadership volunteers and employees at all levels of the organization. The policy is effective on the date of approval.

### **Authorization**

The policy was approved by the board of directors of the MS Society of Canada on November 20, 2009.

## Policy Details

The Executive Team\* is authorized to develop detailed procedures for the application of the Leadership Volunteer and Employee Disclosure and Protection Policy Direction as per the process described below. The procedures are to be developed no later than six months following the approval of the policy direction.

It is the responsibility of all leadership volunteers and employees to report suspected violations of legislation, related regulations and/or MS Society policy directions, procedures and practices in accordance with this policy direction.

Serious violations or wrongdoings may include but are not limited to:

- The contravention of any federal or provincial law or related regulation;
- The misuse of MS Society funds or assets;
- Unethical business practices;
- Damage to the reputation of the MS Society;
- An act or omission that endangers the life, health and safety of clients, volunteers, employees or others associated with the MS Society;
- Directing or counselling someone to commit a violation or wrongdoing.

## Reporting Process

If a leadership volunteer or employee has a reasonable belief that an MS Society volunteer or employee has engaged in action that constitutes a serious violation or wrongdoing, he/she is expected to immediately report such information to one of the following:

- Immediate supervisor;
- Division president;
- Vice-president, talent, programs & services;
- President and chief executive officer;
- External disclosure hotline.

## Investigating and Resolving Complaints

Upon receipt of a complaint of a serious violation or wrongdoing from one of the above, the vice-president, talent, programs & services, shall form a review committee and initiate an investigation, including a discussion with the complainant, to document, investigate and resolve the complaint, using the processes and within the timeframe as described in the Leadership Volunteer and Employee Disclosure and Protection Procedures. Resolution may include dismissing the complaint or initiating internal disciplinary action directed at the person who is found to have committed a serious violation or wrongdoing and/or reporting to

appropriate legal authorities about the serious violation or wrongdoing if it involves a contravention of federal or provincial laws or related regulations.

If the vice-president, talent, programs & services, is alleged to have breached the policy direction, the president and chief executive officer shall lead the investigation process. If the president and chief executive officer is alleged to have breached the policy direction, the chair of the Board of Directors of the MS Society of Canada shall lead the investigation process with the vice-president, talent, programs & services.

### **Anonymity and Confidentiality**

All complaints of a violation or wrongdoing will be kept confidential to the greatest extent possible. While a complaint of a violation or wrongdoing can be made anonymously, such a practice may hinder the investigation of the complaint since the “good faith” of the complainant can not be tested thoroughly.

### **No Retaliation or Reprisal**

The MS Society has zero tolerance for retaliation. No person shall abuse, harass, threaten, discriminate or impose adverse employment consequences on individuals who report possible violations or wrongdoings in good faith.

### **Good Faith**

This policy direction is based on individuals acting in good faith to report concerns they have reason to believe are true. The MS Society may take disciplinary action against an individual who makes unfounded allegations of violation or wrongdoing that are proven to have been made recklessly, maliciously or with the foreknowledge the allegations are false.

### **Executive Champion**

The vice-president, talent, programs & services, is the executive champion for the Leadership Volunteer and Employee Disclosure and Protection Policy Direction and the related procedures.

### **Monitoring and Compliance**

The executive champion is responsible for leading the monitoring of the application and compliance of this policy direction and the related procedures in conjunction with other members of the Executive Team. On a quarterly basis, national vice-presidents and division presidents must acknowledge compliance with this policy direction and the related procedures.

## Related Policies, Legislation

Other MS Society policies that complement and support this policy direction include: Workplace Relationships Policy Direction.

## Policy Review

The policy direction is to be reviewed at a minimum every five (5) years following approval. The related procedures are to be reviewed on an annual basis by the Executive Team.

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## Definitions

**Executive Team** – The most senior level of staff leadership within the MS Society comprised of the president and chief executive officer, division presidents, national vice-presidents of talent, research, marketing and development, programs and services, government relations, information technology, shared services. One person may hold more than one position. The president & chief executive officer may alter the composition of the Executive Team as required from time-to-time.

**Leadership volunteer** – Volunteer who is in a governance position by virtue of being a member of a board of directors of the MS Society of Canada or its chapters and divisions.