

Why does AHS have a Safe Disclosure Policy?

The Safe Disclosure Policy is intended to help detect and deter improper activity and to enhance the reputation and integrity of Alberta Health Services (AHS).

The policy is also intended to ensure safe patient care, create a positive working environment, uphold the integrity of business and clinical operations and enhance the working environment for AHS personnel.

The policy provides a confidential way to report improper activity occurring within AHS, and further protects against retaliatory action resulting from any such reporting.

Why is this policy important?

It helps to create a culture of trust, openness and transparency and allows the public and any AHS personnel to safely report anything they consider to be improper activity without fear of retribution or retaliation. This is also known as the Whistleblower policy.

The policy has been in place within AHS since January of 2009.

To whom does this policy apply?

This policy applies to members of the public and all AHS personnel.

Members of the public are protected from retaliation by AHS under the policy, but are not bound by the duty to disclose provisions. For example, if a member of the public is a witness to improper activities, they are not duty bound to report it. However, if they do report, they cannot be retaliated against by AHS.

Who are AHS personnel?

AHS personnel means any person acting for or on behalf of AHS, including senior officers, employees, members of the AHS Board, members of the medical, dental, podiatry, and midwifery staffs, and other AHS agents, consultants or representatives.

What is considered to be improper activity?

Improper activity means any alleged unethical, illegal and other improper activity, including but not limited to, fraud, violations of laws, violations of the AHS Code of Conduct, principles, policies or bylaws (including the Conflict of Interest Bylaw), and negligence of duty.

Who has a duty to disclose information?

Any member of the public as well as any AHS personnel who have a reasonable basis to believe that improper activity has occurred or is occurring within AHS have a duty to disclose.

If I report an instance of improper activity, should I be afraid of retaliation?

As long as you are acting in good faith, and without malice or desire for personal benefit, you are protected against retaliation.

What kinds of retaliation does this policy protect against?

This policy protects against retaliatory actions such as denial of service or benefits.

How can members of the public report disclosures of improper activity?

Members of the public can report directly to the Ethics and Compliance Officer or through the external confidential reporting and disclosure service.

Information reported through the external confidential reporting and disclosure service will be provided to the Ethics and Compliance Officer for follow-up and/or investigation.

What kind of information should disclosures contain?

Disclosures should be factual rather than speculative and contain as much specific information as possible. For example, disclosures should stick to the facts and what has been personally observed, rather than opinion.

What is the external confidential reporting and disclosure service?

This is an external 24/7 service that AHS has engaged to receive anonymous (or confidential) disclosures of improper activity.

How can I contact the external confidential reporting and disclosure service?

The external confidential reporting and disclosure service can be reached by telephone at 1-800-661-9675.

How can I contact the Ethics and Compliance Officer?

The Ethics and Compliance Officer can be contacted by e-mail at complianceofficer@albertahealthservices.ca

What if the improper activity involves the Ethics and Compliance Officer?

The disclosure will be forwarded to the Chair of the Governance Committee.

If I chose to disclose anonymously, why would my contact information be requested?

Sometimes it is necessary to obtain further information from the person reporting in order to address, review and/or investigate the improper activity. The person reporting the improper activity will remain confidential (or anonymous) to the extent possible, when addressing the matter.

What if I choose to maintain my confidentiality or anonymity?

Your identity will not be revealed without your permission. However, if you choose to maintain your confidentiality or anonymity for specific cases that require disclosure of your information or your identity by policy or law, the review and/or investigation may not be possible, and therefore may not be pursued.

How am I protected from retaliation or retribution related to making a disclosure of improper activity?

AHS strictly prohibits AHS personnel from seeking retribution against anyone who discloses improper activity or who participates in an investigation related to the disclosure.

What is considered retribution?

Retribution includes harassment or prejudicial treatment related to the disclosure.

What do I do if I believe I have been subjected to retribution as a result of disclosing improper activity or participating in an investigation of a disclosure of improper activity?

You may report the matter to the Ethics and Compliance Officer. Any individual may also report the matter to the external confidential reporting and disclosure service.

Does this policy limit my rights legislated by the government?

This policy is intended to enhance or complement other protections and will not interfere with members of the public reporting a matter to the appropriate government or other agency.

Will I receive any follow-up on any disclosures I make?

Yes. You will be informed, in a general way, of the outcome. However, the Ethics and Compliance Officer will be cognizant of the specific circumstances including a request for confidentiality or anonymity of the individual making the disclosure, and/or unduly compromising the privacy of any other individual.

Where are the records related to these disclosures kept?

The Ethics and Compliance Officer (or designate) retains the records relating to the disclosure of improper activity and subsequent actions taken.

Who does the Ethics and Compliance Officer report to?

Functionally, the Ethics and Compliance Officer reports to the Chair of the Governance Committee, and administratively, to the Chief Executive Officer or designate.

Periodic reports on activities in the office are provided to the Chief Executive Officer or designate, the Governance Committee, and the Audit and Finance Committee.