



Policy

Title: Whistleblower		Number: 8051-2026
Reference: Administrative Committee April 29, 2026	Adopted by City Council: May 4, 2026	
	Effective Date: June 15, 2026	
	City Clerk	City Manager
Administered by: Corporate Services Division		

STATEMENT

The City of Medicine Hat (“City”) is committed to providing City Representatives and members of the public a safe, transparent, and accountable environment, where Wrongdoing is reported without fear of Retaliation. The City will be fair and objective when taking action in addressing any improprieties at the City.

PURPOSE

The purpose of this policy is to ensure that the City provides a safe, confidential way for individuals to report concerns about serious Wrongdoing without fear of Retaliation and to promote ethical conduct, protect public resources, and ensure that concerns about integrity are addressed reasonably and promptly.

This policy will reinforce trust in City governance by ensuring that individuals who report concerns in Good Faith are protected from Retaliation and that Reports are handled through a clear and impartial third-party process. By encouraging early reporting and safeguarding those who come forward, the policy strengthens accountability and supports a culture of transparency and integrity within the City.

SCOPE

This policy applies to serious Wrongdoing (as defined in section 1.27), and does not apply to:

- general service complaints from members of the public;
- bylaw enforcement concerns or neighbor disputes;
- customer service issues or dissatisfaction with City decisions;
- access to information requests;
- matters already addressed through established complaint or appeal processes; or
- matters related to job performance, terms of employment, or any other regular or day-to-day issues within the workplace that are not considered Wrongdoing and which are managed through other City policies and procedures.

Policy 8051-2026 – Whistleblower		
Approved by:	City Council – May 4, 2026	Page 2 of 14

Specifically, while Wrongdoing may be reported as set out in this policy, the City’s Respectful Workplace Policy will govern the investigation of any alleged breaches of the Respectful Workplace Policy.

Nothing herein shall be interpreted to lessen any duties, obligations, powers, procedures, or remedies expressly set forth in any other applicable policy, bylaw, agreement, statute, or other law in respect of Wrongdoing, including the reporting of Wrongdoing, or the investigation of such reports.

1. DEFINITIONS

- 1.1 **Anonymized** means that information has been De-identified and grouped in a manner that makes re-identification of any individuals impossible, even when the information is combined with information from other sources.
- 1.2 **Anonymous** means the identity of the individual making the Report is not disclosed if requested by the Whistleblower.
- 1.3 **Audit Committee** means the Council Committee established by the City’s Procedure Bylaw, responsible for oversight of the appointment and performance of the independent auditor of the City’s financial performance, system of internal controls and risk, ongoing financial reporting and other matters referred to it by Council.
- 1.4 **City** means the municipal corporation of the City of Medicine Hat.
- 1.5 **City Asset** means all property owned by the City, including but not limited to:
 - (a) financial assets such as funds, securities, and cash;
 - (b) tangible assets such as land, buildings, materials, supplies, furniture, fixtures, equipment, vehicles, computers, and peripherals;
 - (c) digital assets such as records, transitory information, and electronic mail; and
 - (d) intangible assets such as trademarks, copyrights, trade secrets, proprietary business processes, and customer lists.
- 1.6 **City Liaison** means the individual(s) appointed by the City Manager as the main contact(s) for the third-party reporting service and the Responsible Investigator.
- 1.7 **City Representative** means Employees and any other individuals acting on behalf of the municipality, including City board and commission members, volunteers, contractors, consultants, and suppliers, but does not include City Council Members or members of Council Committees.

Policy 8051-2026 – Whistleblower		
Approved by:	City Council – May 4, 2026	Page 3 of 14

- 1.8 **Claim** means any civil action commenced in any court seeking compensatory damages or any other civil remedy and includes any claim or demand for the payment of money.
- 1.9 **Complaint or Inquiry** means any formal complaint or inquiry brought pursuant to any enactment and includes any complaint under the Alberta Human Rights Act, and any professional disciplinary proceedings pursuant to an enactment regulating conduct of any profession.
- 1.10 **Criminal Prosecution** means alleged violation of the Criminal Code or the Controlled Drugs and Substances Act.
- 1.11 **Council Committee** means a committee, board or other body established by Council under the Municipal Government Act but does not include an assessment review board or a subdivision and development appeal board.
- 1.12 **Decision** means a signed and dated written decision, issued by a Responsible Investigator to the City, in respect of a Report, which states whether Wrongdoing has occurred and identifies the reasons for the decision.
- 1.13 **De-identified** means that all Personal Information is removed and replaced with information that does not directly identify a specific individual, but which could still potentially be used to infer Personal Information with the aid of information from other sources.
- 1.14 **Disciplinary Action** means a consequence imposed by the City in relation to City Representatives up to and including termination of employment, contract, or services, subject to any applicable collective agreement provisions respecting the rights of Employees during disciplinary proceedings and the City’s Progressive Discipline Policy 8029.
- 1.15 **Employee** means any permanent, temporary, full-time, part-time, or casual employee of the City and, for greater certainty, also includes all City employees under any union or association jurisdiction as well as City employees who are out of the scope of any union or association.
- 1.16 **External Investigation or Proceeding** means an investigation or proceeding being carried out by a law enforcement agency, court, or commission, tribunal, or other administrative body in relation to a Claim, Complaint or Inquiry, Criminal Prosecution, or Quasi-Criminal Prosecution.
- 1.17 **Fraud** means an intentional deception used to secure an unfair or unlawful gain, including but not limited to:
 - (a) forgery or unauthorized or inappropriate alteration of a cheque, bank draft, financial document; or any other document belonging to the City;

Policy 8051-2026 – Whistleblower		
Approved by:	City Council – May 4, 2026	Page 4 of 14

- (b) impropriety in the handling or reporting of money or financial transactions;
- (c) misrepresentation, misappropriation, misuse or attempted misuse, or unauthorized destruction of City Assets;
- (d) profiteering as a result of insider knowledge of City activities;
- (e) disclosing confidential and proprietary information to outside parties;
- (f) deception involving procurement, contracting, or vendor relationships, including bid-rigging, collusion, kickbacks, or falsification of procurement documents;
- (g) falsification or manipulation of City records, data, reports, permits, inspections, or timekeeping information;
- (h) undisclosed or improper conflicts of interest;
- (i) unauthorized use or misuse of City services, systems, or network access;
- (j) soliciting or accepting for private gain, money, gifts, favours, or services from any individual, organization, or business undertaking, doing, or seeking to do, business with the City other than gifts, favours, or services given:
 - (i) as an exchange of hospitality that is reasonable in the course of a municipal government’s business, or
 - (ii) as a ceremonial presentation to a person acting in a representative capacity on behalf of the City; and
- (k) any similar or related inappropriate conduct.

1.18 **Good Faith** is evident when a Report is made based on a genuine and reasonable belief that the Report is true and the Report is not made with malicious intent, solely for self-interest, or in support of a personal or political agenda.

1.19 **Gross Mismanagement** means significant departure from accepted management practices that results in substantial misuse or waste of municipal funds or assets, serious financial irregularities, or a systematic failure to follow required procedures but does not include good-faith errors in judgment.

1.20 **Personal Information** means personal information as defined in the *Protection of Privacy Act*, SA 2024, c P-28.5.

1.21 **Quasi-Criminal Prosecution** includes alleged violation of any federal or provincial statute or regulation or municipal bylaw punishable by fine or imprisonment or both, including, without restricting the generality of the

foregoing, prosecution under environmental protection and occupational health and safety statutes, but does not include a Criminal Prosecution.

- 1.22 **Report** means a detailed written allegation submitted by a Whistleblower in accordance with this policy alleging that a City Representative has engaged in Wrongdoing together with all details and circumstances of the Wrongdoing known to the Whistleblower.
- 1.23 **Respondent** means a City Representative who is alleged, in a Report, to have committed Wrongdoing.
- 1.24 **Responsible Investigator** means a third-party contractor (or their representative) engaged by the City to manage and investigate Reports and issue Decisions, except where the Report involves allegations of a breach of the Respectful Workplace Policy in which case the Respectful Workplace Policy shall govern with respect to the Report.
- 1.25 **Retaliation** means any adverse action, threat, or omission taken or directed against a Whistleblower, City Representative, or external investigator by a City Representative with the aim of dissuading them from or punishing them for seeking advice about reporting, submitting a Report in Good Faith, acting as a Responsible Investigator, participating in an investigation, or otherwise carrying out their duties or exercising their rights pursuant to this policy including, without limitation:
- (a) harassment, coercion, intimidation, or violence;
 - (b) unreasonable withholding of City services;
 - (c) with respect to Retaliation against City Representatives:
 - (i) punitive actions, such as reprimand, demotion, transfer, suspension, termination, or elimination of a role;
 - (ii) adverse changes to employment conditions, such as a change to work hours, duties, reporting structure or work location, reduction in pay, or denial of necessary training, resources, or information;
 - (iii) negative impacts on career or contract opportunities, such as loss of advancement opportunities, removal from projects, or limiting professional growth opportunities; or
 - (iv) unjustified actions related to contracts such as termination, non-renewal, cancellation, negative evaluations or reviews, withholding payment, or delaying approvals;
 - (d) a threat to take any of the measures above; or
 - (e) encouraging another City Representative to take any of the measures above.

However, constructive feedback, assignment of work, progressive discipline, corrections, and other directions and decisions administered in good faith in respect of an Employee shall not constitute Retaliation for the purposes of this policy.

1.26 **Whistleblower** means the person who submits a Report in accordance with this policy.

1.27 **Wrongdoing** means a serious improper act or omission by a City Representative which includes, but is not limited to:

- (a) a crime or suspected criminal activity;
- (b) an act or omission that, if proven, could constitute an offence under any applicable law or regulation;
- (c) Fraud;
- (d) Gross Mismanagement of public funds or City assets;
- (e) unethical behavior or practices;
- (f) abuse of authority, including using one's position to improperly influence decisions;
- (g) a violation of this policy including, but not limited to:
 - (i) carrying out any Retaliation;
 - (ii) authorizing or encouraging any Retaliation to be carried out;
 - (iii) providing information to a Responsible Investigator that is known to be false by the person providing such information;
 - (iv) destroying evidence for the purpose of frustrating an investigation; or
 - (v) making a Report that is not in Good Faith;
- (h) a violation of any other applicable statute or City policy, procedure or bylaw that may seriously harm the City or its reputation;
- (i) any other act or omission of a City Representative that may seriously harm:
 - (i) the safety of persons or property; or
 - (ii) the environment; or
- (j) a City Representative knowingly directing or counselling another City Representative to commit any of the above.

2. AUTHORITY

2.1 Pursuant to Section 201 of the *Municipal Government Act*, Council is responsible for developing and evaluating the policies and programs of the municipality.

- 2.2 Pursuant to Section 207 of the *Municipal Government Act*, the City Manager is responsible for ensuring that the policies and programs of the municipality are implemented.

3. PRINCIPLES

- 3.1 Alleged Wrongdoing may be reported in Good Faith by City Representatives and members of the public through an established third-party reporting service.
- 3.2 Whistleblowers may choose to remain Anonymous, recognizing that:
- (a) vague or incomplete anonymous reports may not meet the threshold for investigation;
 - (b) investigations may be limited if additional details cannot be obtained;
 - (c) the City cannot protect a Whistleblower from Retaliation without knowing the Whistleblower's identity;
 - (d) anonymity may restrict the Whistleblower's ability to receive updates or participate in the investigation; and
 - (e) legal processes outside the control of the City may require disclosure of identity if the matter escalates.
- 3.3 With respect to Reports made prior to December 15, 2026, Reports must be made within 12 months of the date of the alleged Wrongdoing, or within 12 months of the date on which the Whistleblower learned the facts tending to support a Report, except in the case of a Report of criminal activity relating to the municipality to which no time limit applies. With respect to Reports made December 15, 2026 or later, Reports must be made within 6 months of the date of the alleged Wrongdoing, or within 6 months of the date on which the Whistleblower learned the facts tending to support a Report, except in the case of a Report of criminal activity relating to the municipality to which no time limit applies.
- 3.4 Notwithstanding section 3.3, if the alleged Wrongdoing set out in a Report was of a continuing nature, with the most recent instance of the alleged Wrongdoing occurring within the timelines set out in section 3.3, the Responsible Investigator may, at their sole discretion, include all instances of the alleged Wrongdoing within the scope of the investigation. If substantiated, all instances of the Wrongdoing may be considered when determining what Disciplinary Action is taken or not taken.
- 3.5 If a Report or an investigation which reveals information suggesting criminal activity an imminent risk of substantial danger to the life, health or safety of any person, or a risk to the environment, that information must be immediately disclosed to the Medicine Hat Police Service or the appropriate regulatory authority.

- 3.6 A Responsible Investigator may, at their sole discretion, redirect, refuse, or discontinue investigation of any Report if:
- (a) the Report does not meet the timeline requirements as set out in section 3.3;
 - (b) the Report is not made in Good Faith;
 - (c) the matter does not meet the definition of Wrongdoing under this policy;
 - (d) there are no grounds or insufficient grounds for conducting an investigation; or
 - (e) the Report is outside the Scope of this policy.
- 3.7 A Responsible Investigator may, at their sole discretion, refuse to investigate or postpone, suspend, or discontinue an investigation if the subject matter of a Report, in whole or in part, is the subject of an External Investigation or Proceeding, or if the Responsible Investigator has been advised or has a reasonable and justifiable belief that the subject matter of the Report will imminently become the subject of an External Investigation or Proceeding, and, in the Responsible Investigator's reasonable and justifiable opinion:
- (a) proceeding with the Investigation could compromise the integrity of the External Investigation or Proceeding;
 - (b) the subject matter of the Report is more appropriately addressed by the External Investigation or Proceeding; or
 - (c) proceeding with the Investigation in parallel with the External Investigation or Proceeding is likely to result in significant and unnecessary duplication of investigative work and/or witness statements.
- 3.8 Investigations will be conducted in a timely manner having regard to the nature and complexity of the Report.
- 3.9 Every reasonable effort will be made to protect the identity of a Whistleblower; however, the City cannot guarantee that the Whistleblower's identity will remain confidential in all circumstances where procedural fairness may directly or indirectly reveal the identity of the Whistleblower.
- 3.10 All City Representatives and Council members who are aware, or become aware, of an investigation will maintain confidentiality and not disclose any knowledge they have or obtain concerning the details or results of an investigation.

- 3.11 A Whistleblower will be advised whether allegations in a Report are substantiated but will not receive a copy of the Decision or information regarding any Disciplinary Action taken (or not taken).
- 3.12 Upon completion of an Investigation, the Responsible Investigator will:
 - (a) send a copy of the full Decision to the City Liaison to distribute internally to those who have a legitimate need to know, as determined on a case-by-case basis, and
 - (b) send a De-identified version of the Decision to members of the Audit Committee and the City Manager for information, on a confidential basis.
- 3.13 Regardless of the outcome of the investigation, the City will take all reasonable steps to prevent and address Retaliation within its authority, recognizing that it cannot control the actions of third parties.
- 3.14 Any determination made pursuant to Sections 3.6 or 3.7, any Decision, and any Disciplinary Action taken (or not taken) by the City as a result of a Decision shall not be subject to any right of reconsideration or appeal under this policy.
- 3.15 Anonymized information will be provided to Council tri-annually through the Audit Committee, including the number and types of Reports received and a general summary of Decisions, subject to privacy legislation. More frequent reporting may be provided if requested by Council.

4. RESPONSIBILITIES

- 4.1 City Council
 - (a) Receive, review and adopt this policy and any recommended amendments thereto.
 - (b) Direct individuals that contact Members of Council in relation to matters described herein to the third-party reporting service.
 - (c) Direct the allocation of resources to cover the cost of the third-party reporting service and the Responsible Investigator.
 - (d) Determine whether and what Disciplinary Action will be taken (or not taken) where the Responsible Investigator determines that Wrongdoing was committed by the City Manager.
- 4.2 Audit Committee
 - (a) Receive De-identified Decisions from the Responsible Investigator for information on a confidential basis.

- (b) Receive tri-annual Anonymized reporting regarding the number and types of Reports received, a general summary of Decisions, and information regarding costs.

4.3 City Manager

- (a) Ensure that appropriate administrative controls are in place and maintained to clearly define behaviour and conduct expected of City Employees.
- (b) Actively and openly discourage Wrongdoing.
- (c) Actively and openly encourage Employees to report Wrongdoing where it is reasonably believed, in Good Faith, to have occurred.

4.4 City Liaison

- (a) Act as the City's point of contact for the third-party reporting service and the Responsible Investigator.
- (b) Provide the Responsible Investigator with contact information for City Representatives as required to conduct an investigation.
- (c) Receive Decisions from the Responsible Investigator and distribute internally to those who have a legitimate need to know, as determined on a case-by-case basis.
- (d) Prepare a tri-annual Anonymized report summarizing Decisions made, and provide such report to Audit Committee and the City Manager for information.

4.5 Third-Party Reporting Service

- (a) Provide multiple methods for submission of Reports.
- (b) Receive, document, and categorize all Reports.
- (c) Assign a unique case reference number for each Report.
- (d) Facilitate communication between the Whistleblower and the Responsible Investigator, including employing a secure mechanism for Anonymous ongoing communication when requested, where clarification or follow-up is required.
- (e) Transmit all Reports to the City Liaison and the Responsible Investigator within 24 hours of receipt.
- (f) Flag Reports that may present heightened risk or urgency.
- (g) Provide the City Liaison and the Audit Committee with Anonymized summarized tri-annual reports including:
 - (i) number and types of Reports received;
 - (ii) high-level categorization of allegations; and

Policy 8051-2026 – Whistleblower		
Approved by:	City Council – May 4, 2026	Page 11 of 14

(iii) trend and themes analysis, where applicable.

4.6 Responsible Investigator

- (a) Perform an initial assessment of a Report subject to sections 3.6 and 3.7 to determine whether a Report meets the threshold for investigation.
- (b) Subject to section (a) above, investigate Reports and issue Decisions to the City in a competent, fair, timely, and impartial manner in accordance with this policy.
- (c) Communicate with the Whistleblower as detailed in the processes in this policy.

4.7 City Representatives

- (a) Maintain awareness and compliance with this policy.
- (b) Understand and adhere to all applicable laws and regulations, policies, procedures, and processes that are applicable to their role.
- (c) Have a proactive mindset to detect and prevent Wrongdoing as far as reasonably possible.
- (d) Avoid conduct or circumstances that would constitute Wrongdoing.
- (e) Report Wrongdoing where the City Representative believes, in Good Faith, that Wrongdoing has occurred.
- (f) Fully cooperate with the Responsible Investigator in respect of any Report or related investigation.
- (g) Take all necessary action to prevent the alteration or destruction of any evidence that may be relevant to any Report or related investigation.

5. REPORTING AND INVESTIGATION PROCESSES

5.1 Reports

- (a) Whistleblowers may submit an allegation of Wrongdoing by providing a Report to the independent third-party reporting service retained by the City as set out on the City’s website.
- (b) Whistleblowers may choose to remain Anonymous, subject to sections 3.2 and 3.9 of this policy.
- (c) Reports alleging Wrongdoing must include:
 - (i) a description of the alleged Wrongdoing;
 - (ii) the name(s) of the individual(s) alleged to have committed the Wrongdoing;

- (iii) the date or time frame of the alleged Wrongdoing;
 - (iv) the date that the Whistleblower became aware of the alleged Wrongdoing; and
 - (v) all available information to support the allegation of Wrongdoing.
- (d) The third-party reporting service will forward all Reports received to the City Liaison and the Responsible Investigator.
 - (e) Reports must be made within the timelines established in section 3.3.
 - (f) Whistleblowers will not suffer Retaliation for any Report submitted in Good Faith even if, upon investigation, the Responsible Investigator dismisses the Report as unfounded.

5.2 Initial Assessment

- (a) Within 5 business days, the Responsible Investigator will acknowledge receipt of Reports in writing to the Whistleblower.
- (b) Within 20 business days, the Responsible Investigator will review Reports subject to sections 3.6 and 3.7 to determine, at their sole discretion, whether the Report meets the threshold for investigation.
- (c) If the Responsible Investigator determines that the Report does not meet the threshold for investigation subject to section 3.6, the Responsible Investigator will, considering the nature of the Report, either:
 - (i) refuse to investigate the Report; or
 - (ii) redirect the Report to the City and any applicable authority subject to section 3.5, for handling as deemed appropriate by the City or the applicable authority.
- (d) If the Responsible Investigator determines at their sole discretion that the Report meets any of the conditions set out in section 3.7, the Responsible Investigator may refuse to investigate the Report. The Responsible Investigator will advise the Whistleblower and the City Liaison in writing of the outcome of the initial assessment.

5.3 Investigation

- (a) Upon receipt of notification of an investigation from the Responsible Investigator, the City shall take immediate action to prevent theft, alteration, or destruction of relevant records.
- (b) The Responsible Investigator may conduct interviews with the Whistleblower, the Respondent, and any witnesses of alleged Wrongdoing in the Report.
- (c) The Respondent will be provided with the specifics of the alleged Wrongdoing and the opportunity to respond to the allegations.

- (d) At the discretion of the City, the Respondent may be placed on paid administrative leave for the duration of the investigation.
- (e) The Responsible Investigator will complete the investigation in a timely manner, having regard to the nature and complexity of the Report. Most investigations should be concluded within 90 calendar days, where feasible.
- (f) If it is determined that an investigation will exceed 90 calendar days, the Responsible Investigator will provide a written notice to the Whistleblower and the City Liaison as soon as reasonably practical. Thereafter, the Responsible Investigator will provide updates to the Whistleblower and the City Liaison regarding the expected timeline every 30 calendar days.
- (g) If at any point during the Investigation it becomes clear to the Responsible Investigator that, at their sole discretion, the Report meets any of the conditions set out in section 3.6 or 3.7, the Responsible Investigator may postpone, suspend, or discontinue the investigation and advise the Whistleblower and the City Liaison in writing.
- (h) During an investigation, a Whistleblower who is an Employee and has chosen not to remain Anonymous may be temporarily reassigned to other duties for the duration of the investigation, provided that such reassignment or leave is not undertaken as Retaliation.

5.4 Decisions

- (a) Upon the conclusion of the investigation, a Responsible Investigator will:
 - (i) prepare and issue a written Decision to the City Liaison;
 - (ii) prepare and issue a De-identified version of such Decision to the Audit Committee and the City Manager;
 - (iii) advise the Whistleblower in writing that the investigation is concluded and whether the allegations in the Report were substantiated.
- (b) The City Liaison will provide a copy of the Decision internally to those individuals who have a legitimate need to know, as determined on a case-by-case basis pursuant to the advice of the Responsible Investigator.

6. CONFIDENTIALITY

- 6.1 Wherever feasible, the City will ensure that all reasonable efforts are made to keep the identities of all parties involved in an investigation confidential; however, the City cannot guarantee that the identities will remain

confidential in all circumstances where procedural fairness may directly or indirectly reveal the identity of a City Representative.

6.2 All parties who have knowledge of or who are participants in an investigation must treat any participation and all related information as confidential. Such information must not be discussed with anyone other than the Responsible Investigator or other authorities subject to section 3.5, as applicable. An acceptable response to inquiries is “I am not at liberty to discuss this matter”.

6.3 Where results are expected to be of public interest, the City Liaison may develop a communications strategy in consultation with the City Manager, which shall be subject to privacy legislation and civil liability risk assessment. Media inquiries shall be referred to the City Manager or, where the City Manager is the Whistleblower or the Respondent, to the Audit Committee Chair.

7. GROUNDS FOR DISCIPLINARY ACTION

7.1 The City may take Disciplinary Action against:

- (a) a Respondent who is found to have committed Wrongdoing;
- (b) a City Representative who knowingly:
 - (i) submits a Report that is not in Good Faith;
 - (ii) makes false or misleading statements to a Responsible Investigator;
 - (iii) withholds, conceals, or destroys evidence related to an investigation;
 - (iv) takes any other action to frustrate an investigation; or
 - (v) carries out or encourages the carrying out of Retaliation; and
- (c) a City Representative who does not maintain confidentiality related to an investigation.