

Procedure

Whistleblower Protection

This procedure falls under the Fraud Administrative Policy, A1464

Program Impacted	Strategy and Business <i>The City of Edmonton's corporate processes are robust and helpful for integrated service delivery</i> Financial Sustainability. <i>The City of Edmonton's resilient financial position enables both current and long-term service delivery and growth.</i>
Approved By	City Manager
Date of Approval	July 8, 2025
Approval History	January 19, 2017
Next Scheduled Review	July 8, 2029

The City of Edmonton is committed to accountability, transparency, responsibility, and sound ethical operating practices, and will protect its revenue, property, records, information, and other assets. To this end, the City will take appropriate measures to maintain an environment in which employees can report incidents without fear of retaliation.

No City employee or person acting on behalf of The City shall take any action in retaliation, oral or written, against a reporter submitting a report in good faith, or against a witness cooperating with a fraud and misconduct investigation.

Employees who receive or investigate retaliation complaints must keep the details and outcome of the investigation confidential. This means disclosure is only permitted to those who have a legitimate need to know, and such disclosure shall be restricted to what must be disclosed to ensure a thorough, effective, and complete investigation/response, or as otherwise required by law.

Retaliation Reporting

If an employee believes that retaliation has occurred, the employee may submit a written complaint to the City Manager within six months of the date the employee knew that the alleged retaliation occurred.

The retaliation complaint must include:

- name and work address of the complainant;
- name and title of each City employee against whom the complaint of retaliation is made;
- the specific type of retaliation;
- the specific date(s) of retaliation;
- a statement as to the facts that form the basis of the complaint of retaliation; and
- a statement from the complainant explaining how their reported allegation and/or participation in an investigation, proceeding, or hearing is related to the retaliation.

Protection against reprisal cannot be effectively provided to non-employees, or to reporters who choose to remain anonymous.

Employees may not seek protection under this Procedure from reprisal that they believe they are experiencing for conduct unrelated to the submission of a report (e.g. poor work performance, a different workplace infraction) as this Procedure deals with reprisal related to reporting only. Likewise, if an investigation finds misconduct on the part of an employee, the employee cannot seek protection under this Procedure for the resulting consequences of that misconduct (e.g. disciplinary action, etc.).

Exceptions

- If a retaliation complaint implicates the City Manager, employees must submit the complaint to the City Auditor instead of the City Manager. The City Auditor will investigate, make determinations, and report the outcome to the Audit Committee as required.
- If a retaliation complaint implicates the City Auditor, employees must submit the complaint to the City Manager. The City Manager will investigate, make determinations, and report the outcome to the Audit Committee as required.

Retaliation Investigation

- Upon receipt of a retaliation complaint, the City Manager will assign the retaliation complaint to an Independent Reviewer who is not involved in any aspect of the complaint.
- The Independent Reviewer will investigate, make determinations, and report the outcome to the City

Manager and all parties involved.

- An employee may appeal the outcome of the Independent Reviewer's investigation to the City Manager by submitting a written request for review of the outcome within 30 days of the date on which the employee receives the report of the Independent Reviewer. The City Manager will review the appeal, conduct a further investigation as appropriate, and may adjust the outcome if necessary. The City Manager will notify all parties, including the Independent Reviewer, of the City Manager's decision regarding the appeal. The City Manager's decision is final for the purpose of this procedure.

Definitions

Unless otherwise specified, words used in this procedure have the same meaning as defined in the City Administration Bylaw, Bylaw 16620.

In addition:

- **Audit Committee** - The standing committee of Council established by Bylaw 12300, Procedures and Committees Bylaw;
- **City Auditor** - The designated officer established by the City Auditor Bylaw, Bylaw 21111;
- **Good Faith** - A report is submitted in good faith when it is genuine and based on reasonable belief/grounds and not made with malicious intent, solely for self-interest, or in support of a personal or political agenda.
- **Fraud** - an act committed by an individual who, by deceit, falsehood, or other fraudulent means, whether or not it is a false pretence, defrauds or attempts to defraud the City, whether ascertained or not, of any property, money, or valuable security or any service
- **Independent Reviewer** - a Deputy City Manager, assigned by the City Manager to review a retaliation complaint, who does not manage the department in which the alleged retaliation occurred, and who is not implicated, involved, or otherwise conflicted in relation to any aspect of the retaliation complaint.
- **Retaliation** - A negative action or threat made by a City employee against a reporter submitting a report in good faith, or against a witness cooperating with a fraud and misconduct investigation.

References

The following are legislative and administrative references relevant to this administrative procedure:

- [Audit Committee - Bylaw 16097](#)
- [City Auditor - Bylaw 21111](#)
- [City Administration - Bylaw 16620](#)