

# Safe Reporting

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# Safe Reporting

## Purpose

Establishes expectations and protections for disclosing Wrongdoing under the *Public Interest Disclosure Act* (PIDA), British Columbia, and for reporting concerns of other Misconduct, in a safe and confidential manner.

## Scope

This policy applies to all current and former employees and directors of the BCLC Board (Board Directors). It should be read in conjunction with the Safe Reporting Procedure (the Procedure).

Application of this policy to Contractors is restricted as outlined in the sections on Application to Contractors and Protections from Reprisal. This policy does not apply to other external persons. BCLC players and members of the public may instead contact BCLC to report concerns by email or telephone (1-866-815-0222).

This policy applies to :

- Disclosures of Wrongdoing as defined in PIDA, including requests for Advice about Disclosures of Wrongdoing; and
- Reports of other Misconduct that may not meet the definition of Wrongdoing under PIDA, including requests for Advice about Reporting Misconduct.

This policy applies to requests for Advice or Disclosures made internally. This policy does not address requests for Advice from, Disclosures to, or investigations carried-out by B.C.'s Ombudsperson, who has distinct PIDA procedures.

This policy supplements other corporate policies, which continue to apply, including but not limited to the Standards of Ethical Business Conduct, Respectful Workplace Policy, Fraud Prevention Policy, Occupational Health and Safety Policy or the Privacy Management and Accountability Policy. This policy does not supersede other mechanisms set out by BCLC and does not preclude a person from reporting a concern through these other available reporting structures, including issues of discrimination, bullying and harassment or occupational health and safety matters.

In the event of difficulty interpreting whether a matter meets the definition of Wrongdoing under PIDA or in interpreting the provisions of this policy and other mechanisms set out by BCLC, employees and Board Directors are highly encouraged to seek Advice in accordance with this policy and the Procedure and to follow this policy and the Procedure when disclosing Wrongdoing, to trigger protection through PIDA, where available.

## Safe Reporting

This policy does not apply to routine operational issues or employment disputes involving purely individual or team interests that are unlikely to qualify as Wrongdoing or Misconduct. Employees should utilize BCLC's [Dispute Resolution Procedure](#) to express and resolve concerns about working conditions or differences in opinions concerning the application or interpretation of BCLC policies, procedures, or employment-related decisions affecting them.

### Policy Statement

All employees and Board Directors who reasonably believe that Wrongdoing or Misconduct has or is about to occur, are expected to promptly disclose information concerning the Wrongdoing or Misconduct. This enables BCLC to act immediately to resolve problems and minimize the risk of damage to BCLC's business, players, people and the public. Disclosures of Wrongdoing and Reports of Misconduct must be made in good faith<sup>1</sup> and may be submitted in accordance with the Procedure.

All Disclosures and Reports received through the Procedure will be assessed by a Designated Officer according to requirements in the Procedure for the initial assessment of a Disclosure or Report.

All Disclosures and Reports are treated as confidential, and the identity of Disclosers, Reporters, Respondents and witnesses must be kept confidential, unless disclosure is required by Applicable Law. No person may share information, including Personal Information, about a Discloser or Reporter that could enable the identification of the Discloser as the person who made the Disclosure<sup>2</sup> or the Reporter as a person who made the Report.

All persons involved in a PIDA process, or a process related to Misconduct Reports, are responsible for maintaining confidentiality in accordance with the Procedure. For clarity, this includes, but is not limited to, Disclosers, Reporters, witnesses, Respondents, Designated Officers, supervisors, individuals delegated duties under this policy or the Procedure and invited third party attendees.

BCLC has zero-tolerance for Reprisal against persons who seek Advice about or make a Disclosure or Report, or who participate in an investigation of a Disclosure or Report. Persons who come forward in good faith in accordance with this policy and the Procedure are protected from Reprisal (see [Protections from Reprisal](#)).

### Context

#### LEGAL AND POLICY FRAMEWORK

Direction in this policy related to Disclosures of Wrongdoing is governed by PIDA, which provides a clear process for voluntarily disclosing concerns about Wrongdoing occurring or about to occur at a public body, as well as direction on the management and investigation of Disclosures and it provides legal protection from Reprisal.

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<sup>1</sup> PIDA, s. 12(1)

<sup>2</sup> PIDA, s. 6(3) and 9(2)(e)

## Safe Reporting

Reporting Wrongdoing under PIDA does not satisfy other legally mandated reporting requirements that may apply. PIDA does not affect other protections found in other B.C. laws, such as the *Freedom of Information and Protection of Privacy Act* (FIPPA), British Columbia.

### POLICY OBJECTIVES

BCLC is committed to upholding strong standards of ethical business conduct and fulfilling our corporate value of integrity, to be fair, honest, transparent and trustworthy. We seek to fulfill our obligations in part by fostering a culture in the organization where employees and Board Directors are encouraged to disclose Wrongdoing and Report concerns of Misconduct. BCLC is committed to investigating and responding to Disclosures and Reports and providing training on PIDA and this policy.

This policy and the Procedure reflect the guiding principle<sup>3</sup> in PIDA that Disclosures must be managed in an expeditious, fair and proportionate manner. Reports of Misconduct are managed by BCLC according to this same guiding principle.

### Policy Details

#### DESIGNATED OFFICERS

BCLC's Chair of the Board of Directors (the Board Chair), who is designated as BCLC's chief executive for the purposes of PIDA, designates<sup>4</sup> those individuals holding the following positions as BCLC's Designated Officers:

- BCLC's Corporate Secretary:
  - designated only for the purposes of receiving and allocating Disclosures and Reports in accordance with this policy to the Designated Officers below, for Reporting, and providing support to Designated Officers as outlined in the Procedure,
- Executive-level Designated Officers:
  - Chief People Officer (CPO),
  - Chief Compliance Officer (CCO) and Vice President of Legal, Compliance, Security,
- Chair of the Governance Committee (the Committee Chair), and
- Chair of the People Committee to act as the delegate for the Committee Chair in the Committee Chair's absence (the Delegate Committee Chair).

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<sup>3</sup> PIDA, s. 17

<sup>4</sup> PIDA, s. 10(1)

## Safe Reporting

The following Disclosures and Reports must be referred directly to the Committee Chair:

- Disclosures or Reports made by Board Directors; and
- Disclosures or Reports that concern the conduct of any member of BCLC's Executive or a Board Director.

All other Disclosures and Reports should be directed to an Executive-level Designated Officer.

BCLC's two Executive-level Designated Officers have the same authority and shared responsibility for the set of duties assigned to a Designated Officer in this policy and the Procedure. The Designated Officer's set of duties may be segregated, in whole or part, amongst the two Executive Designated Officers. Any duty may be carried out by a single Executive Designated Officer or both Executive Designated Officers acting together. If both Executive Designated Officers are available, they will agree on a case-by-case basis who will perform their duties as set in this policy and the Procedure.

### Disclosures or Reports involving the Governance Committee or Board Chair

If a Disclosure or Report concerns the conduct of any member of the Governance Committee, including the Committee Chair, the Disclosure or Report must be made to the Board Chair and the Board Chair may refer the Disclosure or Report to the Delegate Committee Chair, appoint another director of the Board as a Designated Officer to address the Disclosure or Report, or may refer a Disclosure to the Ombudsperson's office.

Any Disclosure that concerns the conduct of the Board Chair must be referred to the Ombudsperson's office.

### Prohibited from Assuming or Performing Duties

An individual appointed by the Board Chair as a Designated Officer must not assume or perform the duties of a Designated Officer in the following circumstances:

- they are in an actual or perceived conflict of interest or believe a reasonable apprehension of bias exists;
- they are the subject of an allegation in the Disclosure or Report; or
- they have not completed training for Designated Officers as required by BCLC and the Ombudsperson.

If any of these circumstances apply, a Designated Officer should recuse themselves and another Designated Officer should assume all duties assigned to a Designated Officer.

### No Designated Officer Available

If no Designated Officer is available or all Designated Officers must recuse themselves, then the Board Chair should consider appointing another Designated Officer who will be available to assume the duties or refer requests for Advice and Disclosures to the Ombudsperson. If it is apparent all BCLC Designated Officers will be unavailable, Disclosers should consider requesting Advice and making Disclosures directly to the Ombudsperson.

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## Delegation Authority

A Designated Officer may delegate their authority, in writing, in part or whole to another individual to assess and investigate Disclosures and Reports at their discretion and as required in the circumstances on a case-by-case basis. Designated Officers must notify the Board Chair, in writing, of any delegations that are made.

## REQUESTING ADVICE

Employees and Board Directors who are considering making a Disclosure or a Report, or have concerns about Reprisal, may request Advice in accordance with the Procedure. Disclosers and Reporters who seek Advice in accordance with this policy and the Procedure are protected from Reprisal. This protection applies whether or not the Discloser or Reporter decides to make a Disclosure or Report.

Where a supervisor receives information from an employee, outside of a Disclosure or Report, about Wrongdoing or Misconduct that has or is about to occur, the Manager must explain to the employee that they have the right to Disclose Wrongdoing or Report Misconduct through the Procedure. In circumstances where the employee advises that they will not make a Disclosure or Report, the supervisor must document the discussion and promptly escalate the matter to the Corporate Secretary.

## ANONYMOUS DISCLOSURES OR REPORTS

Disclosures and Reports may be made anonymously but Disclosers and Reporters are encouraged to identify themselves. Given the technical and logistical requirements of investigating a Disclosure or Report, anonymous Disclosures or Reports may be difficult to resolve when additional information is required. Anonymous Disclosers and Reporters should consider providing contact information that will not identify them when making a Disclosure or Report (for example, an email address that does not include identifiable information), to allow for follow up to obtain further information, as needed. Key considerations when deciding whether to Disclose or Report anonymously are outlined in the Procedure.

## INVESTIGATIONS

A Designated Officer, or their delegate, must investigate a Disclosure or Report where it is decided that:

- a Disclosure warrants an investigation under PIDA and as outlined in the Procedure; or
- a Report warrants an investigation as outlined in the Procedure.

Investigations must be conducted in accordance with the principles of procedural fairness and natural justice, adhering to the requirements in the Procedure<sup>5</sup>.

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<sup>5</sup> PIDA, s. 9(2)(g) and 19(2)

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A Designated Officer must ensure the confidentiality of the information collected<sup>6</sup> and protect the identity of the Discloser<sup>7</sup>, Reporter or other persons involved, in accordance with this policy and the Procedure.

### Respondent Rights

Respondents have the right to:

- know the nature of the Disclosure or Report;
- receive relevant information; and
- be given an opportunity to respond to the Disclosure or Report.

Details about Respondent rights throughout the Disclosure or Report process are outlined in the Procedure.

### Investigation Report and Recommendations

An investigation report that includes recommendations to address findings of Wrongdoing or Misconduct, as applicable, must be prepared in accordance with the Procedure. Findings and recommendations are considered by the Board Chair in determining corrective measures and/or disciplinary action to be taken by the President and Chief Executive Officer of BCLC to implement the corrective measures to remedy the findings of Wrongdoing or Misconduct.

## PROTECTIONS FROM REPRISAL

### PIDA Protections from Reprisal for Wrongdoing Disclosures

PIDA provides protection from both Reprisal (for board directors and employees) and from retaliation (for Contractors).

Under PIDA, Reprisal is strictly prohibited<sup>8</sup> and an offence (see the Compliance section below). This means Board Directors and employees (including supervisors, co-workers, Executive members and Respondents) are protected from any individual taking an adverse measure against them that impacts their employment or position (or an individual who counsels or directs an adverse measure be taken), when they do any of the following acts in good faith (collectively, the Protected Acts):

- seek Advice about making a Disclosure;
- make a Disclosure; or
- cooperate with a PIDA investigation.

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<sup>6</sup> PIDA, s. (9)(2)(c)

<sup>7</sup> PIDA, s. 6(3)

<sup>8</sup> PIDA, s. 31(1)

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An adverse measure includes but is not limited to termination, suspension and demotion, as well as subtler measures like bullying, ostracising or a workplace transfer. Threatening to take any of these measures is also an adverse measure <sup>9</sup>.

Taking any of the following actions of reprisal<sup>10</sup> against a person under contract or agreement with BCLC who, in good faith, cooperates with a PIDA investigation (Retaliation) is prohibited under PIDA and an offence:

- terminating a contract or agreement;
- withholding payment that is due and payable under an agreement; and/or
- refusing to enter into a subsequent agreement.

### Reporting Reprisal Under PIDA

Only the Ombudsperson has authority under PIDA for investigating complaints of Reprisal under PIDA. Disclosers may contact the Ombudsperson's office to make a complaint if they believe that Reprisal has been taken against them because they did a Protected Act.

### BCLC Protections from Reprisal for Misconduct Reports

No person may take a measure of Reprisal against an employee or Board Director, or Retaliate against a Contractor, who:

- seeks Advice about making a Report;
- makes a Report; or
- cooperates with an investigation of a Report.

A person who believes that Reprisal or Retaliation has been taken against them because they sought Advice about making a Report, made a Report, or cooperated with an investigation of a Report, may report the alleged Reprisal or Retaliation to BCLC using the process outlined in the Procedure for making a Report of Misconduct . The reported Reprisal or Retaliation will be investigated in accordance with the requirements for investigating Misconduct Reports under the Procedure.

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<sup>9</sup> PIDA, s. 31(1)(a)-(e)

<sup>10</sup> PIDA, s. 32



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### REDIRECTING DISCLOSURES OR REPORTS

A Designated Officer may redirect a Disclosure or Report through another BCLC policy or procedure, or a Disclosure may be redirected as a Report, where a Designated Officer decides, in accordance with the Procedure, that a Disclosure does not warrant an investigation under PIDA or a Report does not warrant an investigation under this policy. When a Disclosure or Report is redirected, it must be treated with the same level of protection for confidentiality and Reprisal, regardless of the policy or process under which the Disclosure or Report is redirected. Identity protection requirements within the Procedure continue to apply in these circumstances.

### REPORTING ALLEGED OFFENCES TO LAW ENFORCEMENT

A Designated Officer may report to a law enforcement agency or the Gaming Policy and Enforcement Branch (GPEB), an alleged offence (under any legislation) related to a request for Advice, a Disclosure or Report, or a Reprisal complaint under PIDA or this policy, if they have reason to believe an offence may have been committed. The Procedure provides additional direction and guidelines for Designated Officers reporting an alleged offence to law enforcement.

### REPORTING

A Designated Officer must make certain that there is a mechanism to track all Disclosures and Reports received by either a supervisor or a Designated Officer, and Reports received by BCLC's Safe Reporting Advisor. The mechanism must also track the outcomes of all Disclosures and Reports received. This includes tracking those Disclosures initially made to the public under section 16 of PIDA (see Matters Involving Imminent Risk of Danger within the Procedure).

### Annual Public Reporting

A Designated Officer, as delegated by the Board Chair, must report annually on all Disclosures of Wrongdoing received and investigated with respect to BCLC, including Disclosures made to the Ombudsperson that BCLC has been notified about<sup>11</sup>. The annual public report does not include Reports of Misconduct.

A Designated Officer must include the following information in the annual public report:

- the number of disclosures received (including referrals of Disclosures), and the number acted on and not acted on;
- the number of investigations commenced as a result of a Disclosure;

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<sup>11</sup> PIDA, s. 38(1)

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- in the case of an investigation that results in a finding of Wrongdoing,
  - a description of the Wrongdoing,
  - any recommendations, including those made by the Ombudsperson, and
  - any corrective action taken in relation to the Wrongdoing or the reasons why no corrective action was taken; and
- any other information prescribed by regulation.

BCLC includes this annual report as part of its broader Annual Service Plan Report, which is made publicly available on BCLC's [public website](#)<sup>12</sup>.

### Board Reporting

A Designated Officer must provide a report on Disclosures and Reports to BCLC's President and Chief Executive Officer and the Board of Directors (the Board Report) on an annual basis.

The Board Report must contain the same information required for annual public reporting, as well as:

- the number of Reports received, and the number acted on and not acted on;
- the number of investigations commenced as a result of a Report; and
- in the case of an investigation that results in a finding of Misconduct,
  - a description of the Misconduct,
  - any recommendations, and
  - any corrective action taken in relation to the Misconduct or the reasons why no corrective action was taken.

### Confidential Reporting

The annual public report and Board Reports must not publicly identify anyone who has participated in the Disclosure or Report process, including individuals who have requested Advice but not made an official Disclosure or Report. The Board Chair must make certain any material is deleted or excluded from the reports that would unreasonably invade a person's privacy; reveal the identity of a Discloser or Reporter; or reveal the identity of an individual who was the subject of an investigation<sup>13</sup>. The Board Chair (or their designate) may consult Legal Services or the Information Governance team for assistance.

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<sup>12</sup> PIDA, s. 39(1)

<sup>13</sup> PIDA, s. 38(4)

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### APPLICATION TO CONTRACTORS

Under PIDA, only current and former employees or Board Directors may request Advice about or make a Disclosure of Wrongdoing. Disclosures made by other individuals are not covered under PIDA and Contractors are not permitted to make a Disclosure. However, current and former Contractors may instead report matters that may constitute Wrongdoing through BCLC's process for making a Report of Misconduct as outlined in this policy and the Procedure. The application of this policy to Contractors is therefore restricted to those aspects relating to Reports of Misconduct. The Roles and Responsibilities section outlines responsibilities of Contractors related to reporting Misconduct.

### Roles and Responsibilities

**Current and former employees and Board Directors** are responsible for:

- Seeking Advice in accordance with the Procedure if uncertain about whether to make a Disclosure or Report, or whether a matter involves an imminent risk warranting public Disclosure;
- Making Disclosures or Reports in good faith, on the basis of a reasonable belief that Wrongdoing or Misconduct has or is expected to occur, and in accordance with the Procedure;
- Refraining from engaging in Reprisal and reporting Reprisal in accordance with the Procedure;
- Providing their reasonable cooperation during a review, assessment or investigation by a Designated Officer or the Ombudsperson; and
- Maintaining the confidentiality of information, including Personal Information, received in connection with a process under PIDA, this policy or the Procedure.

**Current and former Contractors** are responsible for:

- Seeking Advice in accordance with the Procedure if uncertain about whether to make a Report of Misconduct;
- Making Reports in good faith, on the basis of a reasonable belief that Misconduct has or is expected to occur and in accordance with the Procedure;
- Providing their reasonable cooperation during a review, assessment or investigation by a Designated Officer; and
- Maintaining the confidentiality of information, including Personal Information, received in connection with a process under this policy or the Procedure.

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**Supervisors** are responsible, in addition to their responsibilities as employees, for:

- Fostering a culture where employees are encouraged to report Wrongdoing and Misconduct;
- Informing employees of the protections provided by PIDA or by BCLC under this policy, and the intended use of this policy and the Procedure; and
- Promptly following the Procedure upon receiving a Disclosure or Report.

**The Board Chair** is responsible for:

- Making certain all employees and Board Directors are made aware of PIDA, this policy and the Procedure;
- Promoting a work environment that encourages individuals to report Wrongdoing and Misconduct;
- Designating Designated Officers;
- Determining an appropriate outcome and/or taking corrective actions, as appropriate, when a Disclosure of Wrongdoing or a Report of Misconduct is substantiated; and
- Addressing breaches of this policy or the Procedure in a timely manner and taking the appropriate action based upon the facts and circumstances.

**Designated Officers** are responsible for:

- Completing training for Designated Officers as required by BCLC, prior to assuming or performing the duties of a Designated Officer;
- Establishing and maintaining channels to facilitate the confidential reporting of Wrongdoing and Misconduct;
- Making training on PIDA, this policy and the Procedure available to employees and Board Directors on an ongoing basis to foster a culture of reporting Wrongdoing and Misconduct;
- Receiving, reviewing and assessing Disclosures and Reports in accordance with the Procedure;
- Investigating Disclosures and Reports in accordance with the principles of procedural fairness and natural justice, and adhering to the Procedure;
- Preparing an investigation report that includes recommendations to address findings of Wrongdoing or Misconduct and providing the investigation report to the Board Chair;
- Protecting the identities of Disclosers, Reporters, Respondents, and witnesses and making certain confidentiality is maintained and that all Personal Information received by BCLC related to a process under PIDA, this policy or the Procedure, is appropriately protected; and
- Maintaining and tracking required information and preparing quarterly Board Reports and annual public reporting that complies with PIDA and this policy.

## Safe Reporting

**BCLC's Safe Reporting Advisor** is responsible for:

- Receiving and documenting Reports from employees, Board Directors and Contractors concerning Misconduct, as outlined in the Procedure;
- Protecting the identities of Reporters in accordance with this policy and the Procedure; and
- Forwarding information regarding each Report made under the Procedure to the Corporate Secretary.

### Compliance

Failure to comply with this Policy or the supporting Procedure could result in BCLC not meeting its obligations under PIDA and, consequently, the Ombudsperson may conduct a full investigation or inquiry and/or impose remedial orders.

Board members and employees may be personally subject to fines up to \$25,000 for a first offence and up to \$100,000 for any subsequent offences<sup>14</sup> pursuant to section 41 of PIDA where they willfully:

- make a false statement, mislead, attempt to mislead, or obstruct a person, including the Ombudsperson, from performing their duties, powers or functions under PIDA<sup>15</sup>;
- disclose Personal Information that is likely to enable a person to identify the Discloser<sup>16</sup>;
- took measures of Reprisal against a Discloser<sup>17</sup>; or
- Retaliate against a person under contract or agreement with BCLC who, in good faith, cooperated with an investigation<sup>18</sup>.

Persons may be subject to action, up to and including termination of employment or contract of service if they:

- engage in Reprisal or Retaliation;
- knowingly make a false or misleading statement in the course of seeking Advice about making a Disclosure or Report, in making a Disclosure or Report, or during an investigation;
- wilfully obstruct an investigation or knowingly conceal Wrongdoing or Misconduct;
- fail to comply with confidentiality requirements within this policy or the Procedure; or
- direct, counsel, or cause, in any manner, a person to do any of the above.

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<sup>14</sup> PIDA, s. 41(4)

<sup>15</sup> PIDA, s. 41(1)

<sup>16</sup> PIDA, s. 6(3) and 41(3)

<sup>17</sup> PIDA, s. 31 and 41(3)

<sup>18</sup> PIDA, s. 32 and 41(3)

# Safe Reporting

## Definitions

Defined (capitalized) terms or acronyms used but not defined in this policy have the meaning attributed to them in the [Policy Glossary](#).

<b>Advice</b>	Means advice that may be requested in respect of making a Disclosure or Report, or in respect of making a complaint about a Reprisal under PIDA or pursuant to this policy and the Procedure.
<b>Applicable Law</b>	Means a domestic or foreign enactment as defined under section 32(1) [ <i>References to enactments</i> ] of the Interpretation Act, an order of a court, or an order made by a public officer or administrative tribunal.
<b>Designated Officer</b>	Has the meaning prescribed to it in section 1 of PIDA and, as at the date of this policy means a senior official designated under section 10 [ <i>designated officer</i> ] to receive requests for Advice and receive and investigate Disclosures under PIDA. This policy also assigns authority to the designated officer(s) to receive requests for Advice and receive and investigate Reports of Misconduct.
<b>Discloser</b>	<p>Has the meaning prescribed to it in section 1 of PIDA and, as at the date of this policy means an employee who requests advice or makes a Disclosure or a complaint about a Reprisal under PIDA.</p> <p>For the purposes of PIDA, “employee” has the meaning prescribed to it in section 1 of PIDA and means:</p> <ul style="list-style-type: none"> <li>a) an employee of a ministry, government body or office, and includes a person appointed under section 15 [<i>appointment by Lieutenant Governor in Council</i>] of the Public Service Act, or</li> <li>b) a member of a class of persons prescribed by regulation.</li> </ul> <p>This includes those individuals prescribed in section 2(a) of PIDA:</p> <ul style="list-style-type: none"> <li>(i) a director or an officer, in respect of a government body, and</li> <li>(ii) a former employee, if a Wrongdoing occurred or was discovered when the employee was employed by the ministry, government body or office, as applicable.</li> </ul>
<b>Disclosure</b>	Has the meaning prescribed to it in section 1 of PIDA and, as at the date of this procedure, means a disclosure of Wrongdoing made by a discloser in accordance with PIDA.

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<b>Misconduct</b>	Means an act or workplace practice involving unethical, illegal or improper conduct that does not constitute Wrongdoing under PIDA, including a violation of BCLC's Standards of Ethical Business Conduct for Employees or Contractors, or another BCLC policy, standard or procedure.  In the case of Contractors, misconduct includes acts or workplace practices that constitute Wrongdoing, as Contractors are not eligible to disclose Wrongdoing under PIDA.
<b>Ombudsperson</b>	Means the Ombudsperson of British Columbia.
<b>Report</b>	Means a report of Misconduct made by a Reporter in accordance with this policy and the Procedure.
<b>Reporter</b>	Means a person who requests Advice about Reporting or Reports an allegation of Misconduct.
<b>Reprisal</b>	Has the meaning prescribed to it in section 31(1)(a) to (e) of PIDA and, as at the date of this policy, includes the following measures: a) a disciplinary measure; b) a demotion; c) a termination of employment; d) any measure that adversely affects the employee's employment or working conditions; e) a threat to take any of the measures referred to in paragraphs a) to d).
<b>Respondent</b>	Means a person(s) against whom allegations of Wrongdoing, Misconduct or a complaint of Reprisal is made or a person who is found to have committed Wrongdoing or Misconduct.
<b>Safe Reporting Advisor</b>	Means an external third party contracted by BCLC to receive Reports of Misconduct on behalf of BCLC, as outlined within this policy.
<b>Wrongdoing</b>	Has the meaning prescribed to it under section 7(1) of PIDA and, as at the date of this policy, means: a) a serious act or omission that, if proven, would constitute an offence under an enactment of British Columbia or Canada; b) an act or omission that creates a substantial and specific danger to the life, health or safety of persons, or to the environment, other than a danger that is inherent in the performance of an employee's duties or functions; c) a serious misuse of public funds or public assets; d) gross or systemic mismanagement; or e) knowingly directing or counselling a person to commit a wrongdoing described in paragraphs a) to d).

Policy

APPROVED

# Safe Reporting

## Policy Ownership

Contact Position	Designated Officers
Policy Owner	President and Chief Executive Officer
Approving Body	Board of Directors

## Revision History

Version	Effective	Approved by	Amendment
1.0	Mar 1, 2024	Board of Directors	New policy superseding the Whistleblower Policy.