

<b>CALGARY STAMPEDE FOUNDATION – CORPORATE POLICY</b>			
<b>Department</b>	Youth Campus & Youth Education	<b>Number</b>	CSF-CP-012
<b>Subject</b>	Protected Disclosure Policy	<b>First Issued</b>	February 23, 2023*
		<b>Effective</b>	February 23, 2023
<b>Issued to</b>	Employees, Contractors, Volunteers and Participants	<b>Version</b>	02 (Dec. 2024)
<b>Approved by</b>	Board of Directors	<b>Next Review</b>	December 2026

**1.0 POLICY STATEMENT**

- 1.1 The Calgary Stampede Foundation has high standards of personal ethics and conduct for individuals involved with its programs and activities and encourages a culture of integrity and accountability.
- 1.2 The Calgary Stampede Foundation has established this policy, including an Escalation Report mechanism, to provide for the prevention, detection, reporting and investigation of any suspected Misconduct by employees, contractors, volunteers, and participants involved with Calgary Stampede Foundation programs and activities.
- 1.3 Everyone involved with Calgary Stampede Foundation programs and activities is encouraged to raise concerns about Misconduct without risk of Reprisal so that concerns can be investigated and addressed.

**2.0 PURPOSE**

- 2.1 The purpose of this policy is to:
  - a. Provide stakeholders with mechanisms for reporting concerns about suspected Misconduct;
  - b. Provide a mechanism for Escalation Reports;
  - c. Ensure concerns are received and addressed in accordance with Calgary Stampede Foundation procedures; and
  - d. Protect those who report concerns in good faith.

**3.0 SCOPE**

- 3.1 This policy applies to:
  - a. Calgary Stampede Foundation employees, contractors, and volunteers;
  - b. Calgary Stampede employees, contractors, and volunteers involved with Calgary Stampede Foundation programs and activities;
  - c. Calgary Stampede Foundation Program Participants;
  - d. Participants’ parents and/or legal guardians; and
  - e. Any other stakeholder who becomes aware of or is concerned about the health, safety, and welfare of Participants or others involved with Calgary Stampede Foundation programs and activities.
- 3.2 Calgary Stampede employees, contractors, and volunteers may also report concerns about Misconduct in accordance with this policy, however, the Calgary Stampede is responsible for investigating and addressing concerns in accordance with its policies and procedures. The Calgary Stampede Foundation may receive and investigate reports regarding the conduct of Calgary Stampede employees, contractors, Participants, and volunteers in collaboration with the Calgary Stampede and may take action with respect

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to individuals' involvement with Calgary Stampede Foundation programs and activities.

- 3.3 Guests of CSF Education School Programs (schoolteachers, volunteers, and students) are not subject to the CSF Code of Conduct and any concerns about misconduct by these individuals is outside the scope of this Protected Disclosure Policy. These program participants are responsible to follow their respective school board policies, however they may report concerns about CSF personnel conduct in accordance with this policy as would any member of the public who becomes aware of misconduct.

#### 4.0 DEFINITIONS

- 4.1 **Escalation Report** refers to concerns about serious Misconduct (such as fraud, theft, illegal or unsafe activity, harassment, or violence) that are made directly to the Executive Director.
- 4.2 **Misconduct** means conduct that violates expectations and requirements set out in relevant Calgary Stampede or Calgary Stampede Foundation policies including applicable Code of Conduct policies, Respectful Workplace policies and the Calgary Stampede Foundation Duty of Care Policy. This may include contravention of applicable laws, any act or omission that creates harm or risk of harm to others, knowingly counselling another to commit Misconduct, or retaliation or reprisal against an individual for reporting a concern or participating in an investigation in accordance with this policy.
- 4.3 **Participants** refers to youth, typically ages 7-25, who are enrolled or registered in a Calgary Stampede Foundation program such as the Calgary Stampede Showband, the Calgary Stampede Showriders, the Young Canadian School of Performing Arts, the Young Artist Poster Competition, the Indigenous Youth Program, the Stampede Summer Camp.
- 4.4 **Reprisal** refers to retaliatory measures that are taken against an individual because the individual has sought advice about a concern, made a report in good faith, or cooperated in an investigation in accordance with Calgary Stampede Foundation policy. Retaliatory measures may include but are not limited to any threat or action that adversely affects an individual's involvement with the Calgary Stampede Foundation such as the employment, working conditions, or educational experience of the individual as applicable.
- 4.5 **Trauma-Informed** refers to the practice of responding to situations in a manner that minimizes risk of re-traumatizing someone, recognizing that processes involved with complaints, disclosures, and reports of alleged Misconduct may inadvertently recreate the conditions of a person's previous trauma. A trauma-informed approach seeks to provide a sense of safety, of choice and control to the person who has experienced trauma, acknowledges what the survivor has gone through, allows the survivor to decide what healing looks like, involves them in decision-making, and requires frequent check-ins to make sure their needs are being met.

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**5.0 REPORTING CONCERNS OF MISCONDUCT – GENERAL**

- 5.1 Concerns about Misconduct should be made verbally or in writing to the applicable Calgary Stampede Foundation Manager or Director.
- 5.2 If a Manager or Director is the subject of a concern, the report may be made to another Calgary Stampede Foundation employee (e.g. another Manager, Director, or the Executive Director).
- 5.3 Misconduct concerns may be reported anonymously, but this may limit the Calgary Stampede Foundation’s ability to respond and investigate.
- 5.4 Misconduct concerns may also be reported through the Confidential Reporting Line. The Confidential Reporting Line can be contacted by email at [reporting@activatehr.ca](mailto:reporting@activatehr.ca) or by phone at 1-833-648-4437.
- 5.5 Others including volunteers, contractors, and Participants in leadership roles, may become aware of concerns about misconduct or wrongdoing. These individuals should encourage others with firsthand knowledge of the concern to make a formal report and are encouraged to make a report themselves in accordance with this policy to ensure a concern is addressed.

**6.0 RECEIVING A REPORT OF POTENTIAL MISCONDUCT**

- 6.1 Any Calgary Stampede Foundation employee who receives a report of Misconduct is responsible to immediately document the report, if received verbally, and forward it to the Executive Director or designate in accordance with the Internal and External Complaints Standard Operating Procedure.
- 6.2 Individuals receiving a report of Misconduct verbally should ensure the safety and wellbeing of the reporter by arranging a private time and place, inviting a supportive third-party of the reporter’s choosing (e.g., a parent or legal guardian if the reporter is a Participant under 18 years old), and listening to the report without interruption. In receiving the report, the receiver should record as many details as possible including:
  - a. The reporter’s name and contact information;
  - b. The nature and details of the Misconduct including applicable dates, times, and the names of other people involved or who may have been witness to the issues giving rise to the concern;
  - c. Any information or evidence to substantiate the concern; and
  - d. If applicable, the reporter’s desired outcome.
- 6.3 Reports of Misconduct will be promptly investigated and addressed in accordance with the Investigation Procedure.
- 6.4 Reports related to fraud will follow the Financial Fraud Reporting Policy.

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## **7.0 ESCALATION REPORTS**

- 7.1 Escalation Reports may be made directly to the Executive Director or designate at when:
- a. The concern is about serious Misconduct (e.g., theft, illegal or unsafe activity, sexual or physical assault, harassment, or violence); and
  - b. A previous report made under section 5.0 in this policy has not been appropriately addressed, or the individual reporting does not feel comfortable reporting a concern to the Program Manager or another Calgary Stampede Foundation employee.
- 7.2 The Executive Director is required to report to the Board of Directors on all Escalation Reports.
- 7.3 Escalation Reports will be promptly investigated and addressed in accordance with the Investigation Procedure.
- 7.4 Any report involving potential Misconduct of the Executive Director may go directly to the Calgary Stampede Foundation Board Chair

## **8.0 CONFIDENTIALITY AND PROTECTION FROM REPRISAL**

- 8.1 The Calgary Stampede Foundation will treat reports of Misconduct as confidential to the greatest extent possible and will only disclose information as necessary for the purpose of investigating and addressing the complaint and as required by law. In such instances the individual(s) involved in a Misconduct investigation will be informed in advance.
- 8.2 Individuals who seek advice about this policy or a concern, report Misconduct, and participate in investigations in good faith will be protected from Reprisal for doing so. Reprisal will not be tolerated and may result in disciplinary action, which may include termination of an individual's involvement with any Calgary Stampede Foundation program or activity.
- 8.3 Any individual who believes they have been subject to Reprisal because they have sought advice about this policy or a concern, reported a concern about Misconduct, or participated in an investigation in good faith should report this to their Manager or Director in accordance with this policy so that the concern of Reprisal may be investigated and addressed.

## **9.0 COMPLIANCE AND ENFORCEMENT**

- 9.1 Any report that proves to be false, malicious, frivolous or vexatious may be treated as a violation of the applicable Code of Conduct Policy and result in disciplinary action, which may include termination of an individual's involvement with any Calgary Stampede Foundation program.

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**10.0 REFERENCES**

- CSF-CP-007 Code of Conduct Policy
- CSF-CP-012 Participant Code of Conduct Policy
- CS Code of Conduct Policy
- CSF-PE-001 Respectful Workplace Policy
- CS Respectful Workplace Policy
- CSF-CP-011 Duty of Care Policy
- CSF-PR-SOP-001 Investigation Procedure
- CSF-PE-SOP-001 Internal and External Complaints Standard Operating Procedure

Note: \*\*This is policy, in combination with others listed in the references, consolidates, updates, and formalizes CSF Youth Interaction Practices issued in 2019