



Integrity Policy

Effective Date April 3, 2017

Approval Date March 23, 2017

Review Date March 2022

Policy Statement	<p>Ottawa Community Housing Corporation (OCHC) is committed to acting with integrity in protecting its resources.</p> <p>This policy will ensure claims or concerns raised regarding fraud, waste or misuse of OCHC resources are documented, investigated and addressed in a diligent and timely manner.</p>
Policy Objectives	<ul style="list-style-type: none"> • Provide a simple and anonymous mechanism to report claims • Establish a consistent process to document, investigate and address claims in a fair manner • Manage claims diligently and with respect and discretion • Maintain a system to document and track claims • Establish corporate reporting requirements for claims • Identify expectations for the response to substantiated claims
Policy Principles	<ul style="list-style-type: none"> • Accountability, responsible stewardship and transparency in protecting OCHC resources is critical to maintaining public trust • Maintaining an environment where individuals can raise concerns without fear of reprisal is essential • A fair and equitable process is critical to encourage and address claims responsibly
Application	<p>This policy will be used to receive, document, investigate and address claims of fraud, waste, or misuse of OCHC resources.</p> <p>If a claim is under investigation externally (criminally, Canada Revenue Agency, etc.), the internal investigation may be suspended or withdrawn.</p>

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Roles & Responsibilities

Key Roles	Key Responsibilities
Chief Executive Officers	<ul style="list-style-type: none"> • Provide overall direction on the implementation of this policy • Delegate key responsibilities for the administration of this policy • Immediately report significant claims and financial or reputational high-risk patterns of fraud, waste and misuse of resources to the Board of Directors • Ensure that corporate reporting requirements on this policy are met
Vice Presidents Directors	<ul style="list-style-type: none"> • Immediately report significant claims and financial or reputational high-risk patterns of fraud, waste and misuse of resources to the CEO • Ensure that this Policy, procedures and associated documentation are consistently applied within the department • Ensure employees are appropriately informed and supervised in complying with this Policy, procedures and associated documentation
Managers	<ul style="list-style-type: none"> • Ensure employees are informed and supervised to comply with this policy, procedures and associated documentation and highlight areas that are relevant to the employee's work
Vice President, Finance Director, Finance	<ul style="list-style-type: none"> • Review claims of fraud, waste and misuse regarding contractors and business invitees • Designate staff investigator or external investigator • Assign claims for investigation • Oversee investigation process • Advise Manager, Executive Operations of completion status on claim investigations and actions • Review and approve investigation reports • Initiate corrective action when necessary

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<p>Vice President, Tenant Services</p> <p>Director of Operations</p> <p>Director, Human Resources</p>	<ul style="list-style-type: none"> Review claims of fraud, waste and misuse regarding tenants, (received through the online tool and telephone line) and employees Designate staff investigator or external investigator Assign claims for investigation Oversee investigation process Advise Manager, Executive Operations of completion status on claim investigations and actions regarding tenants and employees Review and approve investigation reports Initiate corrective action when necessary
<p>Tenant Services Manager</p>	<ul style="list-style-type: none"> Review claims of fraud, waste and misuse regarding tenants, (received directly through the area offices) Designate staff investigator or external investigator Assign claims for investigation Oversee investigation process Advise Housing Administrator of completion status on claim investigations and actions Review and approve investigation reports Initiate corrective action when necessary
<p>Manager, Executive Operations</p>	<ul style="list-style-type: none"> Register fraud, waste and misuse claims regarding contractors, business invitees and employees using the fraud and waste tool Complete initial triage and information-gathering on claims Submit claims regarding contractors and business invitees that require investigation to the Vice President, Finance Submit claims regarding employees that require investigation to the Vice President, Tenant Services Redirect claims regarding tenants to the Tenant Service Coordinator Update the status of claims on the fraud and waste tool

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Tenant Service Coordinators	<ul style="list-style-type: none"> • Register fraud, waste and misuse claims, (received through the online tool and telephone line) regarding tenants using the fraud and waste tool • Complete initial triage and information-gathering on claims • Submit claims requiring investigation to the Vice President, Tenant Services • Redirect claims regarding contractors, business invitees and employees to the Manager, Executive Operations • Update the status of claims on the fraud and waste tool
Housing Administrators	<ul style="list-style-type: none"> • Register fraud, waste and misuse claims, (received directly through the area offices) regarding tenants on the fraud and waste tool • Complete initial triage and information-gathering on claims • Submit claims requiring investigation to the Tenant Service Manager • Redirect claims regarding contractors, business invitees and employees to the Manager, Executive Operations • Update the status of claims on the fraud and waste tool
Investigator (assigned by the Vice President or designate)	<ul style="list-style-type: none"> • Review the Investigation Guide in advance of commencing an investigation • Follow the investigation steps • Prepare investigation report and recommendations • Submit and brief the Vice President Executive Officer or designate on the investigation report • Keep the investigation material confidential
Employee	<ul style="list-style-type: none"> • Read, understand and comply with this policy, the procedures and associated documentation • Direct individuals who want to report Report possible fraud, waste or misuse to the integrity portal or hotline • Cooperate if required in investigations of a possible fraud, waste or misuse

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Related OCHC Policies and Procedures	<ul style="list-style-type: none"> • Personal Information and Privacy Policy • Conflict of Interest Policy and Procedures • Code of Conduct • Procurement Policy and Procedures • Travel and Hospitality Expense Policy, Procedure and Standards • Tenant Neighbour Complaint Policy and Procedure • Eviction for Cause Policy and Procedure • Fraud, Waste and Misuse Procedure • OCHC Investigation Guide
Other Supporting References	
Questions / Contact	Vice President, Finance Vice President, Tenant Services

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Appendix 1 – Definitions

Term	Definition
Resources	Includes financial, physical and intellectual assets or potential assets such as cash, expected income and subsidies, real property, equipment and corporate information
Integrity	The quality of being ethical, honest and fair
Fraud	Deceitful, dishonest or unfair action(s) taken by an OCHC tenant, employee or contractor for personal gain that has direct or indirect costs to the Corporation
Waste	Careless, inefficient or damaging action(s) by an OCHC tenant, employee or contractor that has direct or indirect costs to the Corporation
Misuse	Incorrect or improper use of OCHC resources, equipment, business processes or corporate information that has direct or indirect costs to the Corporation
Investigation	A structured, fact-finding inquiry completed by an employee or external resource regarding a fraud, waste, and misuse claim
Recovery	The process of attempting to obtain compensation to the Corporation for financial losses caused by proven acts of fraud, waste and misuse
Risk	The likelihood that an event or series of events will occur that will have an adverse impact on achieving results or missing out on opportunities
Without Fear of Retaliation	Assurance that persons who in good faith report potential fraud, waste or misuse will be treated respectfully
Triage	The initial review and organization of fraud, waste, and misuse claim information so that it can be properly registered in the system and directed to the appropriate resource
Corrective Action	The actions that will be taken in situations where the investigation has concluded that a fraud, waste, or misuse claim is upheld.
Business Invitees	Vendors, contractors or other providers of goods and services to OCH tenants or OCH. Community organizations that have a relationship with OCH are also considered business invitees

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Appendix 2 – Document History

Revision Number	Date	Author(s)	Brief Description of Change
0.1	2017-01-05	Brent Schwieg	Initial draft developed from the general sample prepared by Policy and program Officer and shared with the Board of Directors in December 2016
0.2	2017-01-11	Brent Schwieg	Incorporated feedback from the Policy and Program Officer
0.3	2017-01-12	Kelly Hastings	Incorporated feedback from workgroup
0.4	2017-01-17	Kelly Hastings	Incorporated feedback from Steering Committee
0.5	2017-01-20	Brent Schwieg	Incorporated feedback from VP, Tenant Services and Director of Operations (Chapel Office)
0.6	2017-01-24	Brent Schwieg	Incorporated feedback from VP, Tenant Services and VP, Organizational Effectiveness to clarify routing of claims and to identify ownership of policy
0.7	2017-01-30	Brent Schwieg	Incorporated feedback from CEO

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