

# 2025 Annual Whistleblower Report

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February 12, 2026



# What is the Whistleblower Program?

- Whistleblower Policy determines scope of the Whistleblower Program
- Confidential and potentially anonymous method to report allegations of “serious wrongdoing”- fraud, waste, serious misuse of funds or assets, certain conflicts of interest
- One tool in a suite of initiatives necessary to demonstrate commitment to honesty and integrity

CITY OF VANCOUVER		Corporate Policy
POLICY TITLE	Whistleblower Policy	
CATEGORY	Council	
POLICY NUMBER	COUN-010 (formerly ADMIN-002)	
POLICY OWNER	Auditor General	
ACCESS	Public	

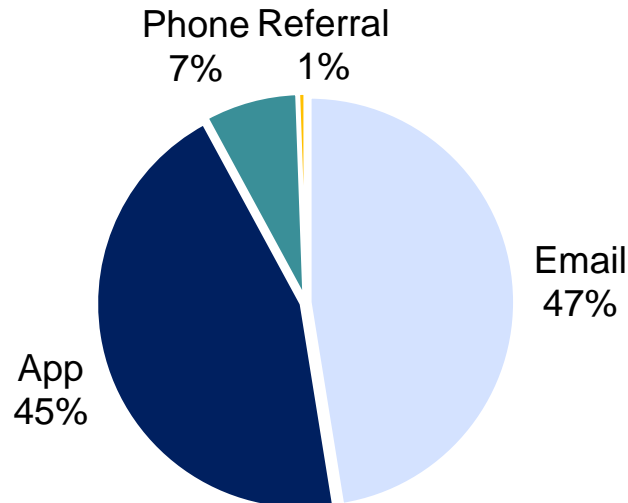


## Whistleblowing

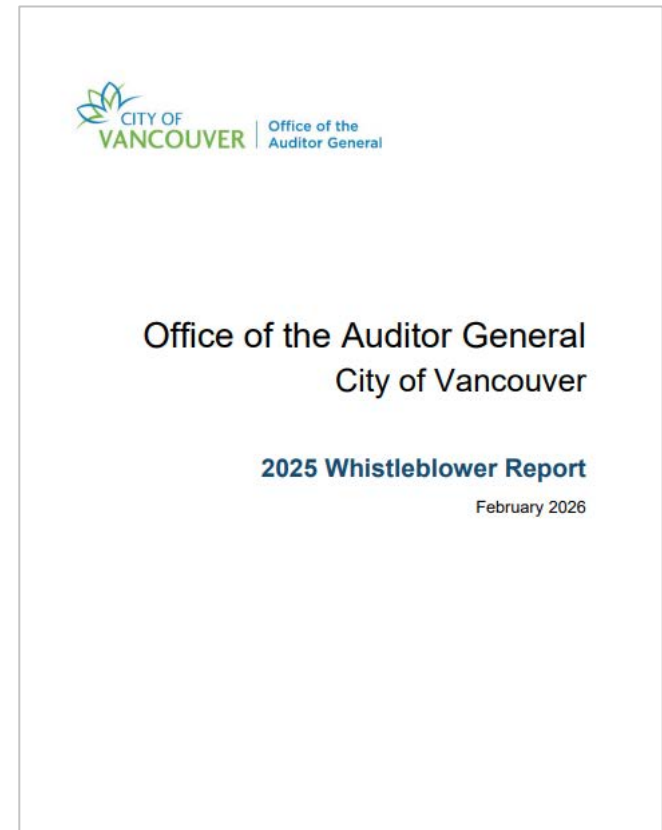
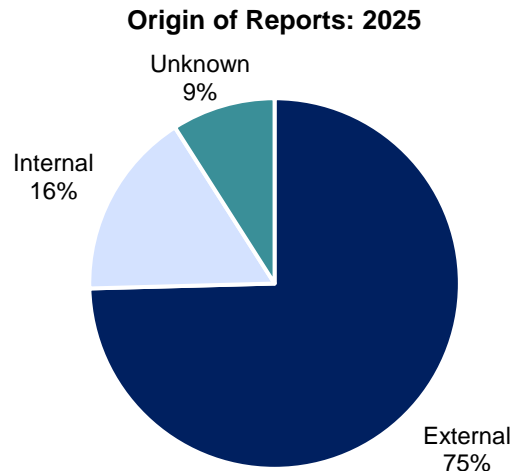
Confidentially report alleged serious wrongdoing involving City resources, assets, and programs.

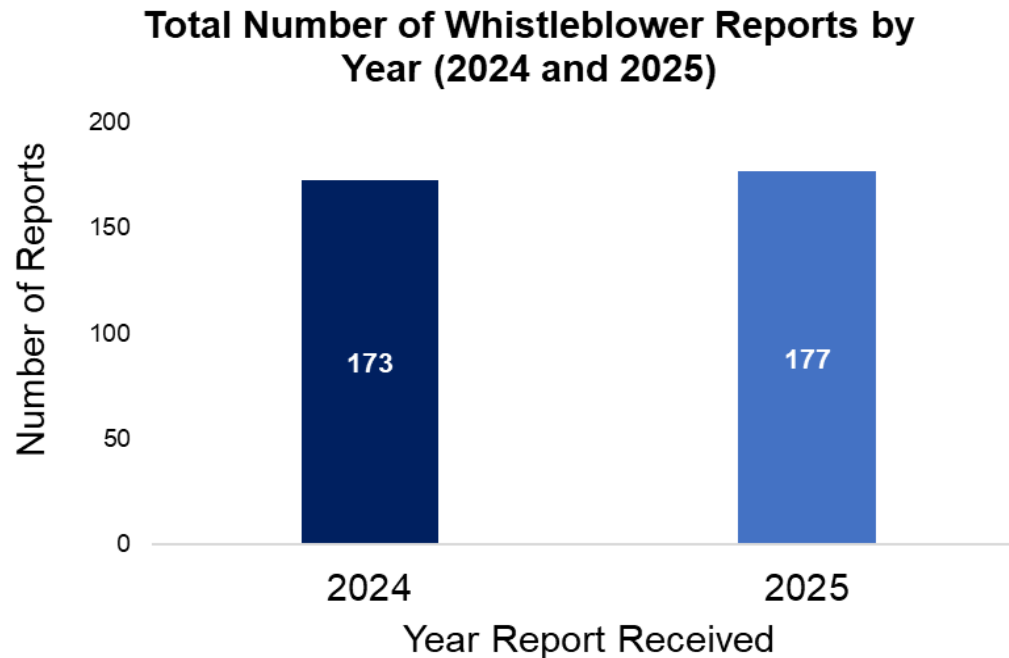
- Council assigned the Auditor General responsibility for a revised and expanded Whistleblower Policy from January 1, 2024
- Expansion included enabling public to report
- Reports received via dedicated OAG-managed webform, email or phone

**Reports by Intake Method: 2025**



- Doesn't duplicate:
  - Other City Policies e.g. Code of Conduct
  - Dispute resolution mechanisms e.g. for parking tickets
  - Collective or other employment agreements
- 2<sup>nd</sup> Annual Whistleblower Report

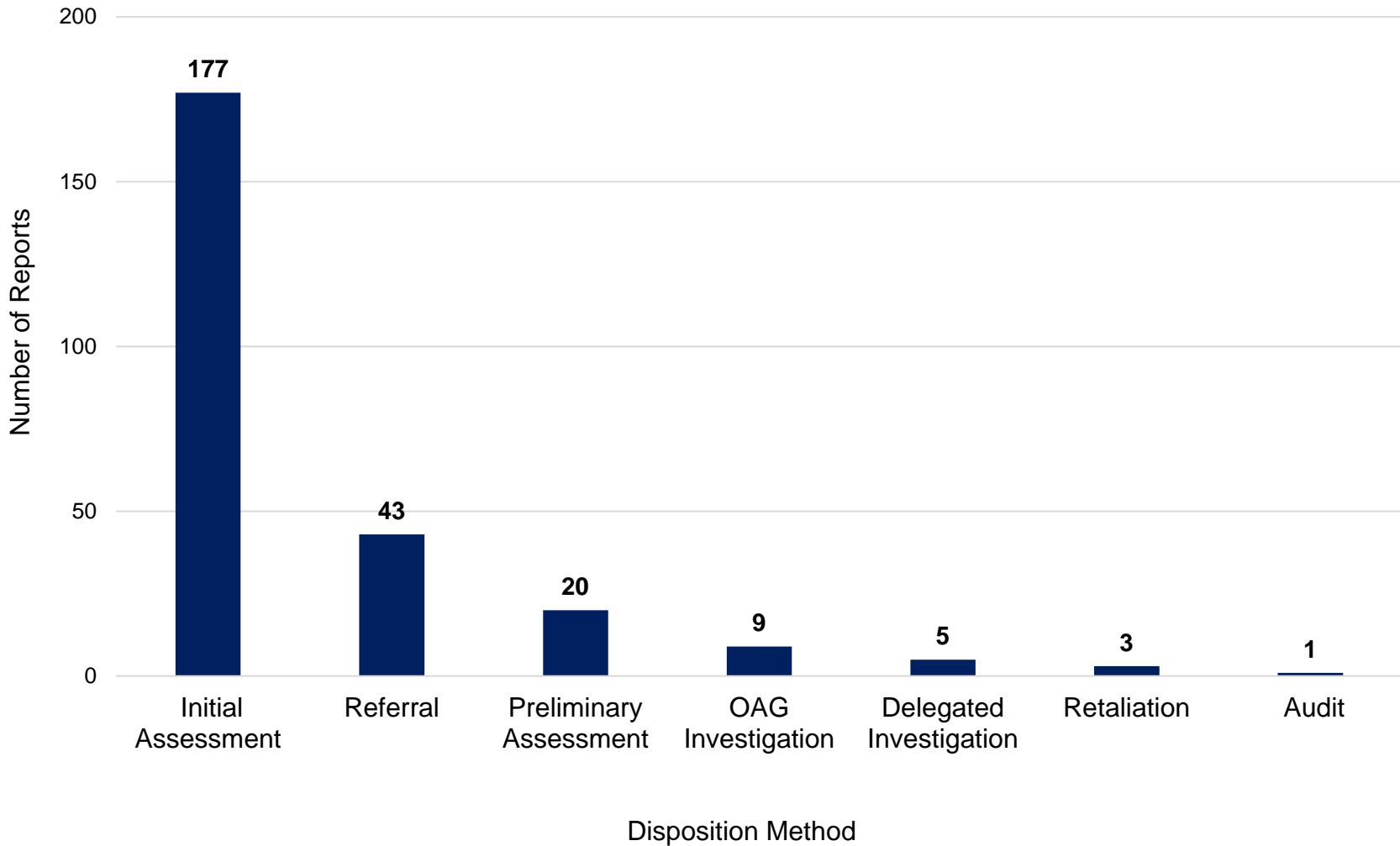




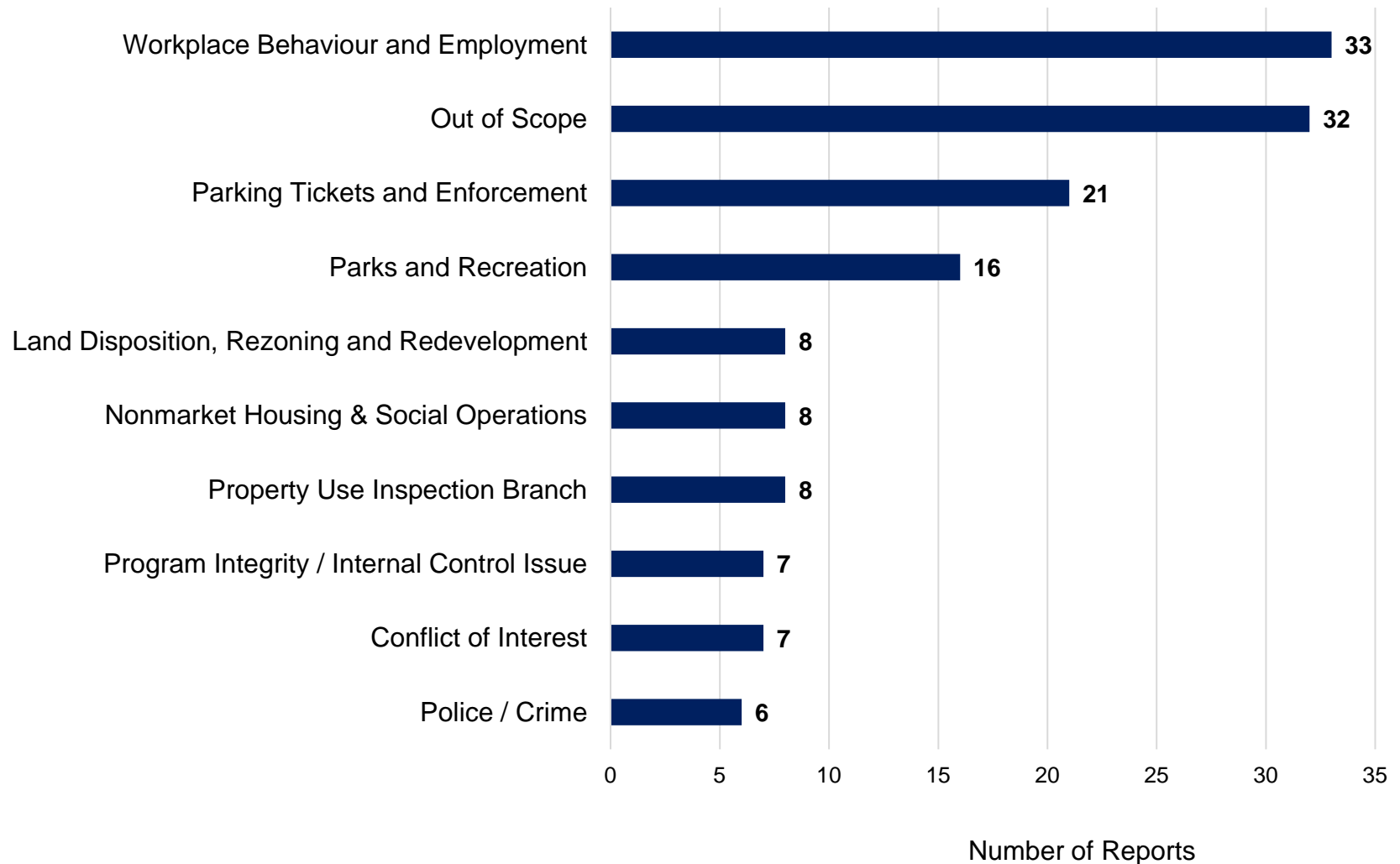
- 171 of 177 2025 reports (204 allegations) resolved
- All remaining reports from 2024 resolved
- All remaining reports under active assessment or investigation

# Disposition of Whistleblower Reports

**Disposition Status of Reports Closed or In Progress as at December 31, 2025**

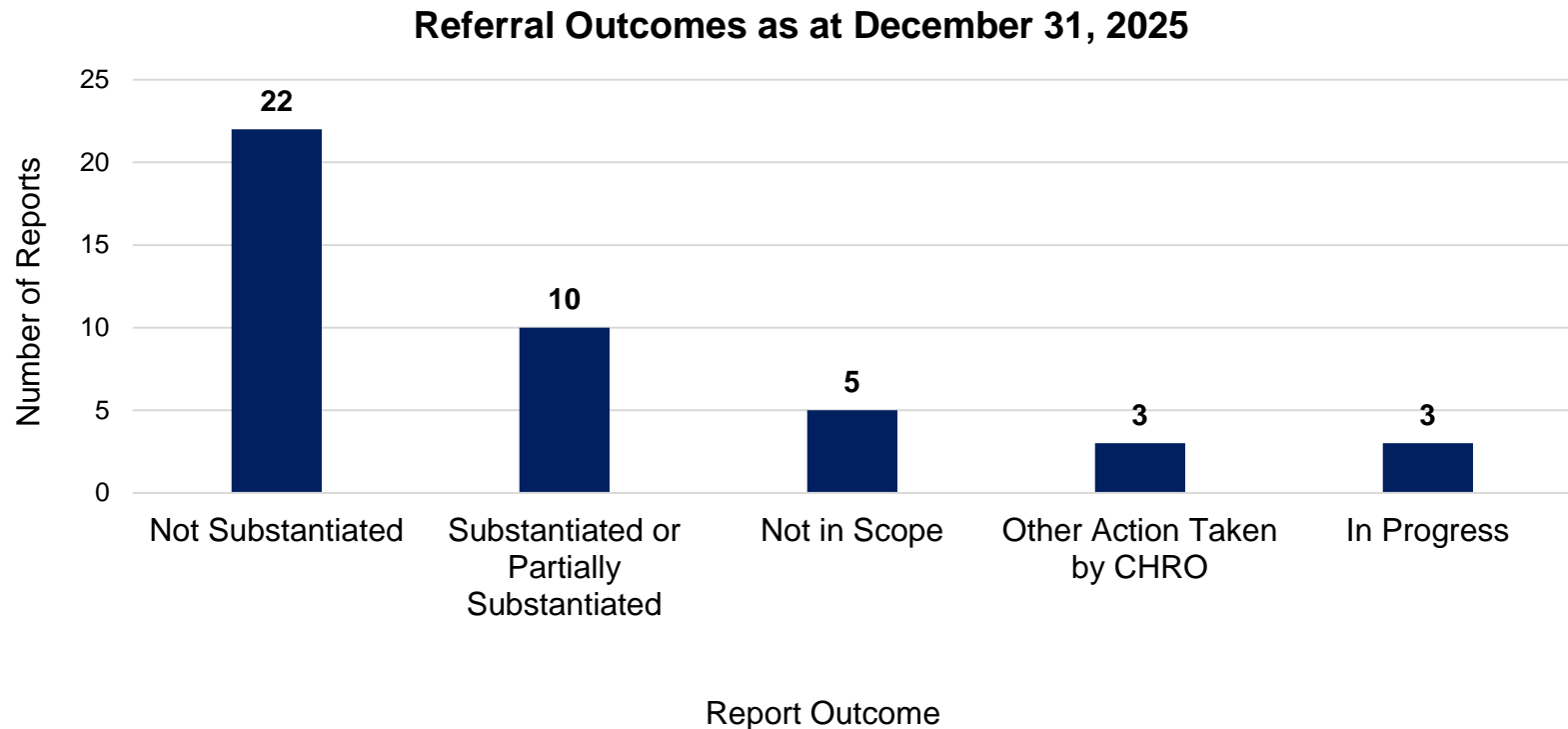


## Ten Most Common Issues Raised in 2025 Reports



# Referral outcomes: added value from Whistleblower function

- Referrals a sizeable portion of outcomes for reports
- Don't conduct referral investigations but track them for completeness
- Results show significant value add



## Complaint self-assessment tool

Use this tool to check whether your concern could be investigated by the OAG.

Is your report about a City of Vancouver employee, volunteer, or contractor?

Yes

No

Next

- 40 recommendations provided to City departments from OAG Whistleblower reports
- Implemented Whistleblower software
- Launched new Whistleblower webpage and webform

## Whistleblower Report

Office of the Auditor General, City of Vancouver

### Instructions

You're about to submit a report to the Office of the Auditor General for the City of Vancouver (OAG)

- This form provides a **confidential and secure** means of reporting allegations of serious wrongdoing...

[Show more](#)

### Report Details:

Estimated time to complete: 5-10 minutes

Use this section to describe your allegation(s) of serious wrongdoing by a City of Vancouver employee, volunteer or contractor, which could involve:

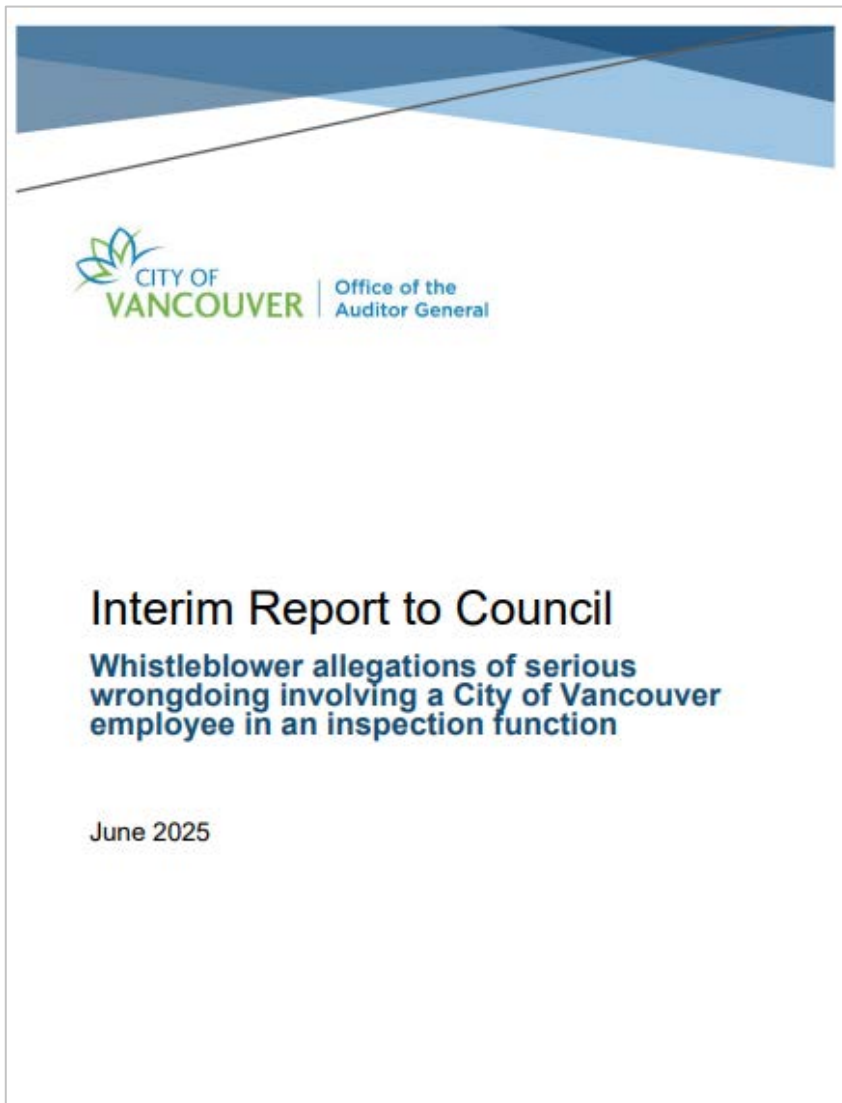
- conflict of interest,
- serious misuse of public funds or assets,
- fraud and/or
- waste.

You don't have to be certain that serious wrongdoing has occurred – the OAG will review every report.

**Description of the potential serious wrongdoing:** (required)

### Instructions

Describe the potential serious wrongdoing in as much detail as you can.



- First substantial employee-informed whistleblower investigation identified and addressed significant control weaknesses in the City
- 19 recommendations endorsed by AGC

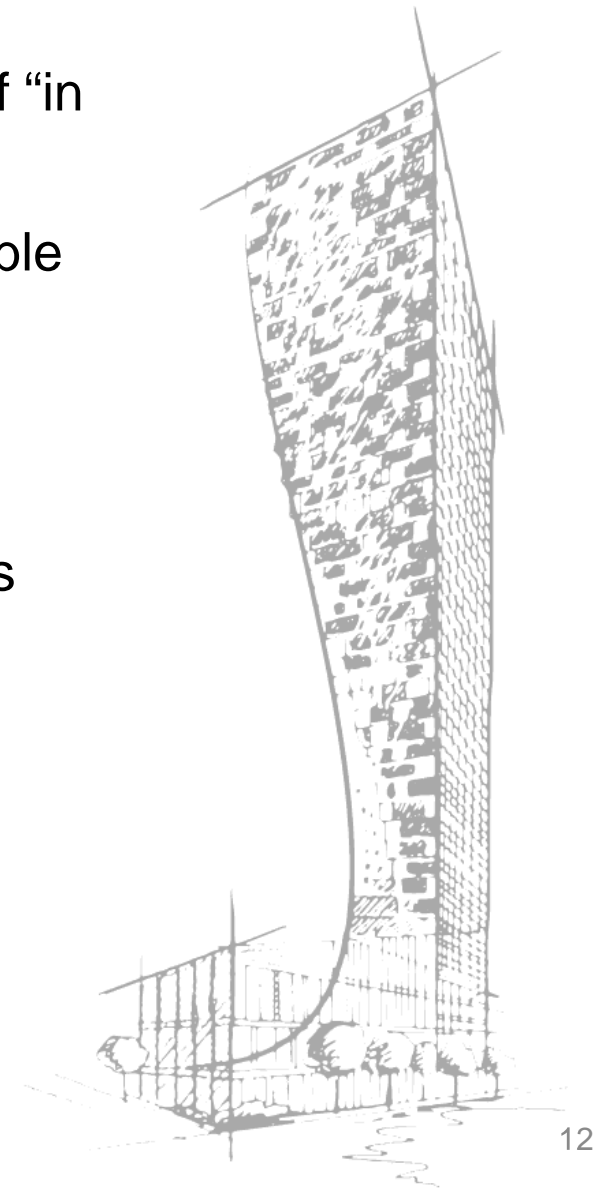
# Recommendation implementation: Substantial progress

- 17 recommendations in 2024
- 19 of this year's 40 recommendations from the June 2025 Interim Report AGC endorsed in June 2025
- City self-reports on progress:
  - 14/17 (82%) completed on 2024 Reports
  - 14/19 (74%) already completed on 2025 Interim Report



# Example Report 1: Delivery of Community Amenity Contributions

- Agreement with developer included \$6 million of “in kind” value
- Management of in-kind CAC short of a reasonable standard
- Amounted to waste under Whistleblower Policy definition
- Six recommendations address the shortcomings



1. When the City and a developer agree upon in-kind CACs, a clearly defined, itemized, and costed list of deliverables should be created. This list should be reviewed and agreed to by the developer and the City departments with relevant subject matter expertise to provide the necessary certainty for an enforceable agreement, ideally prior to it being submitted to Council for approval.
2. The City should calculate the cost implications for anything more than minor changes made to agreed upon CAC-related deliverables. These calculations and decisions should be formally documented.
3. The City should obtain Council approval of materiality thresholds for reporting and approving changes to CAC-related deliverables, with guidance sought from the City's Legal Services department as needed.

4. Using the list suggested in Recommendation 1, City staff should ensure that all CAC-related deliverables have been completed before issuing an occupancy permit for a development.
5. The list of deliverables suggested in Recommendation 1, and any subsequent and material changes should be made publicly accessible by the City to ensure a high degree of transparency and accountability, as is expected in the public sector. The City could publish a database of CACs so the public can see the public benefits linked to particular development approvals.
6. The City should create mechanisms to ensure that in-kind CACs provided by developers, including public access to assets delivered under a CAC, remain at a standard approved by Council. These mechanisms could draw from those in City services agreements where applicable.



- Allegation of pre-determination and preferential treatment in allocation of mobile vending permits
- Significant gaps between advertised and actual selection process
- Vulnerable to serious wrongdoing and uneven playing field
- Potentially retaliatory comments addressed by staff
- Five recommendations around robust and procedurally fair process

1. The Park Board should ensure that the Request for Expressions of Interest (RFEOI) document and its website accurately describe the selection process that will be undertaken, including the criteria for selection, any exceptions that may be possible to the criteria, and who will make the permit decisions.
2. The Park Board should ensure that all applicants are assessed against the same objective criteria listed in the RFEOI document, with weightings for the criteria added to the RFEOI process. To facilitate this, the Food and Beverage Ops team should access the expertise of the City's Supply Chain Management (SCM) team to ensure the process can withstand scrutiny.
3. The Park Board's assessments of each applicant against the criteria--- including reasoning for rejection or selection, and any exceptions---should be formally documented and ensure criteria not in the RFEOI are not used to determine who is granted a permit under the Program.

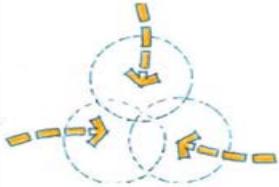
4. The Park Board should consider improving communication with potential applicants, including responding in a timely and transparent manner to questions raised about the RFEOI process and informing all applicants of the outcome of the RFEOI process.
  
5. The Park Board should ensure no one staff member is solely responsible for determining successful applicants under the Program to reduce the risk of integrity breaches in the Program process. Options to achieve this include having a) at least two members of staff independently score applicants, with highest average scored applications selected or b) have one member of staff complete the initial scoring of all applications and a second independent member of staff review their work and rationale.

- Complaint about procurement of planning services for False Creek South neighbourhood
- Engagement initially scoped at \$50,000, City paid over \$900,000
- Allegations considered:
  1. City contracted with a firm without a competitive bidding process
  2. Contract was inappropriately managed, including payments made before they were authorized
  3. A subsequent City contract potentially duplicated the consultant's work.

- Process did not meet several Procurement Policy requirements for selecting and contracting a third-party
- “Serious mismanagement of public funds”
- The City sole sourced the contract without satisfying the grounds in the City’s Procurement Policy
- No evidence of approval to sole source
- No documentation of whether sole sourcing represented “Best Value” to the City



- In second phase, City attempted to invoke “exigent circumstances” exception to sole source without a Notice of Intent to Contract.
- Asserted need for confidentiality not formally documented or independently scrutinized
- Unclear whether confidentiality needed
- Sole sourcing shielded the selection from stakeholder engagement and scrutiny- contrast with Council’s *Vision Statement and Provisional Guiding Principles for False Creek South*, which committed to engage community and stakeholders in a meaningful way



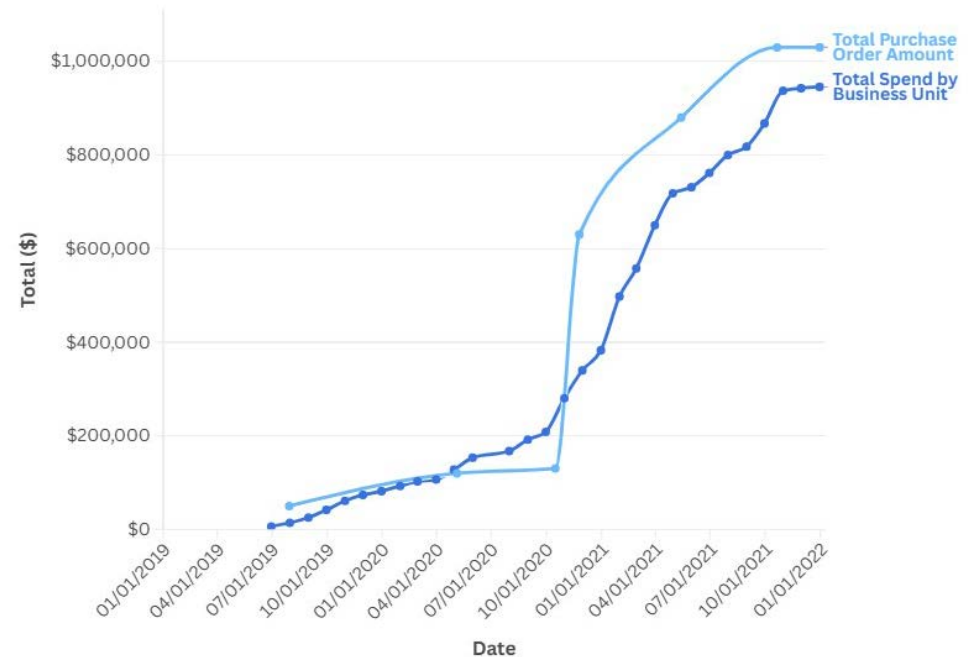
**PRINCIPLE 9:  
ENGAGE COMMUNITY AND  
CITY-WIDE STAKEHOLDERS IN A  
MEANINGFUL WAY**

Undertake a process inclusive of the community, adjacent communities, and city-wide stakeholder perspectives. Work within the City of Reconciliation framework and its foundational components.

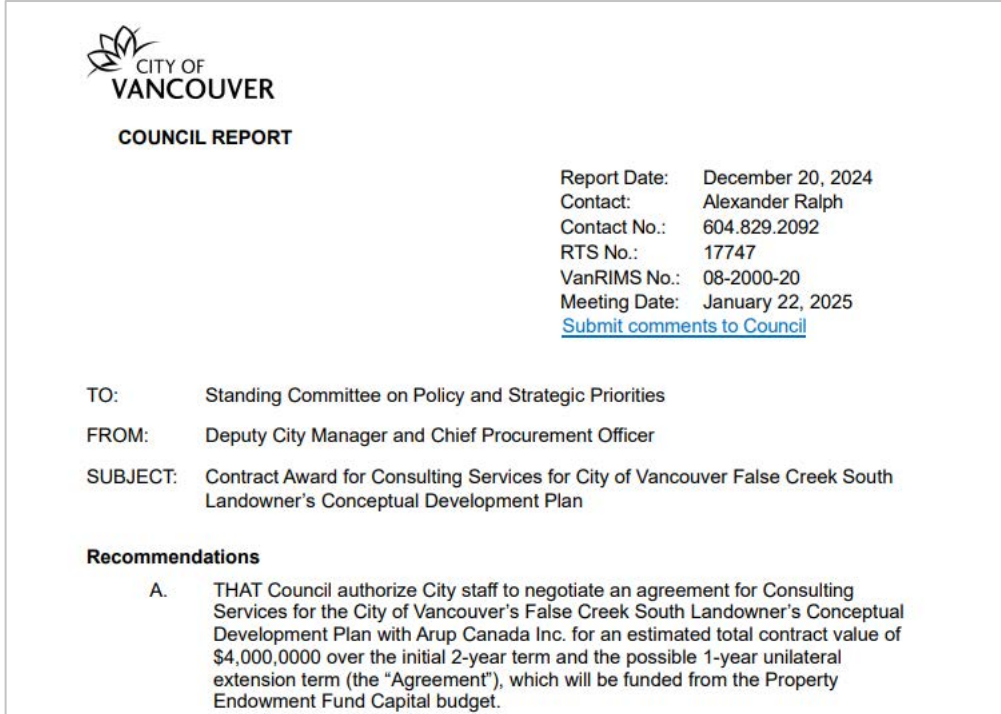
# False Creek Procurement: Allegation 2


- Allegation substantiated: Steps required under City Procurement Policy not taken or documented
  - “serious mismanagement of public funds”
- Work began before City approvals obtained
- Invoices exceeded purchase orders at several points
- No total or fixed price
- Structure avoided Policy requirement where cost increases are subject to increasing levels of senior-level approval

Total spend by City vs. total approved purchase order



- Allegation not substantiated
- New RFEOI was issued in 2024, but \$4 million contract awarded to different consultant for related not the same work
- Recommendations:
  - Improve the City's procurement practices to better achieve the aims of the Procurement Policy and mitigate risks
  - Improve documentation of the decision rationale and increased scrutiny of rationale



 CITY OF VANCOUVER  
**COUNCIL REPORT**

Report Date: December 20, 2024  
Contact: Alexander Ralph  
Contact No.: 604.829.2092  
RTS No.: 17747  
VanRIMS No.: 08-2000-20  
Meeting Date: January 22, 2025  
[Submit comments to Council](#)

TO: Standing Committee on Policy and Strategic Priorities  
FROM: Deputy City Manager and Chief Procurement Officer  
SUBJECT: Contract Award for Consulting Services for City of Vancouver False Creek South Landowner's Conceptual Development Plan

**Recommendations**

A. THAT Council authorize City staff to negotiate an agreement for Consulting Services for the City of Vancouver's False Creek South Landowner's Conceptual Development Plan with Arup Canada Inc. for an estimated total contract value of \$4,000,0000 over the initial 2-year term and the possible 1-year unilateral extension term (the "Agreement"), which will be funded from the Property Endowment Fund Capital budget.

1. If choosing to sole source a contract that relies on the “exigent circumstances” provision, City staff should formally document what the rationale for sole sourcing is and how the sole source provider represents Best Value for the City of Vancouver.
2. If not issuing a Notice of Intent to Contract, City staff should formally document their rationale for doing so. The rationale should include, where applicable, clear reasoning for how and why a public Call would impair confidentiality, cause adverse economic consequences, or be contrary to the public interest.
3. The rationale for decisions by the CPO to sole source contracts for goods and services over \$75,000 without a public Call or without issuing a Notice of Intent to Contract should be reviewed and approved by a senior member of City management.

4. The City's Procurement Policy states that application of the City's Procurement Policy will be monitored and reviewed by the CPO, who will annually report to the Corporate Leadership Team and City Council on the procurement activities of the Vancouver Group for the previous year. In instances where the CPO is directly involved in the procurement, particularly where a competitive procurement process is not undertaken, the General Manager of Finance & Supply Chain (FSC) should conduct this monitoring, reviewing and reporting activity to provide the necessary independent assurance to Council over procurement activities.
5. The City should update the Procurement Policy (ADMIN-008) to require that a formal reassessment process be undertaken at certain dollar increments (to be specified by the CPO) on sole sourced contracts that did not have a public Call or that were not the subject of a Notice of Intent to Contract. At these increments, the CPO and the contracting business unit should assess whether a public Call or Notice of Intent to Contract should be issued for any additional spending or if the original rationale for neither occurring still exists.

6. SCM should exert appropriate control through the Procurement Policy over “time and materials” contracts, including limiting when they can be used and ensuring that costs under such contracts are governed by approval mechanisms similar to those which apply to contracts with a Total Price.
7. All City departments should be required to formally document the rationale for contract scope expansions that exceed approval limits established in the Procurement Policy, for review and scrutiny by SCM.
8. The City should educate and inform departments of the risks associated with obtaining goods or using services prior to having sufficient and approved funding in their purchase orders, and devise and enforce consequences for staff who commit the City to spending without the necessary approvals.

- Allegation: A City of Vancouver employee had a conflict of interest in the procurement of an external consultant
- No conflict of interest: procurement was administered by employee's unit, but the particular employee was not involved in it.
- Investigation identified shortcomings in the City's management of the procurement processes and resulting standing offers for consultants
- Two recommendations regarding procurement process and coordination

1. The OSCO should coordinate with Engineering Services on procurement processes for safety consultants intended for use on projects managed by Engineering Services. This includes considering involving Engineering Services personnel in developing criteria for and scoring proponents on public Calls.
2. The OSCO, Supply Chain Management (the City's procurement specialists), and the Engineering Services department should better document administrative decisions regarding the safety-related third-party contracts. This includes documenting the rationale for utilizing some pre-qualified consultants over others for individual engagements, and when consultants' work is deemed unsatisfactory. Consultants' work product should be evaluated by staff receiving that work and that evaluation should be considered when awarding future work to consultants under the RFQ.

- THAT the Auditor General Committee endorse the 21 recommendations made in the Auditor General's report entitled "2025 Whistleblower Report", dated February 5, 2026.
- FURTHER THAT the endorsement be recommended to Council for approval.

Questions?