



At times, concerns are raised with elected officials or members of Administration with regard to conduct by City contractors or subcontractors. These concerns can be wide-ranging, including those in relation to:

- racism, transphobia, homophobia, anti-Semitism, Islamophobia, or other human rights violations;
- unfair or illegal employment practices;
- contractors breaching contracts with or dealing unfairly with subcontractors or suppliers;
- tax evasion or tax avoidance;
- fraud or other criminal conduct;
- competition law, including bid-rigging, deceptive marketing, and anti-competitive behaviour;
- corruption, including bribery of foreign or domestic government officials;
- intellectual property infringement;
- employing and/or mistreating undocumented workers;
- misuse of the Federal Temporary Foreign Worker Program or other immigration programs, including mistreatment of Temporary Foreign Workers;
- human trafficking;
- non-compliance with occupational health and safety legislation;
- non-compliance with environmental legislation; and
- privacy violations.

Those with concerns about these issues should also provide any information they have to the appropriate government agency. Many issues fall within the jurisdiction of other orders of government and regulatory agencies, so the City may have limited ability to act on the information. A list of contacts is included at the end of this document (note that this contact information is subject to change and may not be current).

By raising the concern with the appropriate contact, the complainant will be contacting those with expertise in the type of issue, as well as those with investigative and enforcement tools the City does not have. The contractor or subcontractor complained of is also more likely to receive due process and have the opportunity to defend themselves against the allegations.

After directing the complainant to contact the appropriate agency, Administration can decide whether the City can and should take further action with respect to the complaint.

Consult with Legal Services and Corporate Procurement and Supply Services (CPSS) for options. If the contractor or subcontractor is part of an ongoing procurement process or if they are performing work under a current City contract, Legal Services can advise on

what options are available based on the wording of the procurement process or contract. Legal Services will also advise as to whether the City has other legal obligations specific to the type of complaint, and whether the City should notify the contractor of the complaint.

Unless the allegations against a contractor or subcontractor have been proven or admitted in the appropriate court or tribunal, there is legal risk in taking action against the contractor or subcontractor. These risks include:

- breach of contract - if the City terminates a contract without having the clear right to do so under the contract, it could be in breach of contract, leading to potential damages claims by the contractor; or
- defamation claims - if the City makes untrue claims about a contractor or subcontractor, they could claim that the City has damaged their reputation.

These risks must be weighed against the considerations including the following:

- Are the concerns allegations or has a court or other appropriate tribunal found the contractor or subcontractor guilty of the conduct in question?
- Is the conduct related to the work the contractor or subcontractor is doing for the City?
- Are there any City employees involved in the conduct?
- How serious is the conduct?
- If the concerns are still allegations, is there any evidence for the truth of the allegations? How weighty and reliable is the evidence?
- Does the City have reasonable grounds to believe that harm to people, animals, or the environment is imminent or is already occurring? Would action by the City be able to reduce or stop this harm?
- Would the proposed action by the City against the contractor or subcontractor be illegal?
- What options are available under the contract or procurement process?
- Would the City's reputation be harmed in the eyes of the public by doing business with the contractor or subcontractor?

The action the City decides to take will depend upon all of these factors. Some possible actions include:

- Contacting the Office of the City Auditor and/or Corporate Security;
- Giving a contractor a limited time to resolve the concerns;
- Terminating one or more contracts with a contractor;
- Disqualifying a bidder from a procurement process;
- Directing a contractor to replace one of its subcontractors;
- Putting a contractor on probation or under suspension; or
- Taking control of a work site.

Other options, including taking no action, may be relevant depending upon the particular situation. Legal Services and CPSS can help City staff make the right decision depending upon the complaint.

RELEVANT GOVERNMENT AGENCIES

Complaint related to...	Contact...
Competition law, including bid-rigging, deceptive marketing, and anti-competitive behaviour	<p>Competition Bureau Toll-free: 1-800-348-5358 https://competition-bureau.canada.ca/</p>
Contractors breaching contracts with or dealing unfairly with subcontractors or suppliers	<p>Service Alberta Toll free: 1-877-427-4088 https://www.alberta.ca/file-consumer-complaint</p> <p>Better Business Bureau https://www.bbb.org/</p> <p>Professional Regulators https://www.alberta.ca/regulatory-bodies</p> <p>Alberta Courts https://albertacourts.ca/</p> <p>Law Society of Alberta Lawyer Directory https://lsa.memberpro.net/main/body.cfm?menu=directory</p>
Corruption, including bribery of foreign or domestic government officials	<p>Royal Canadian Mounted Police (bribes to foreign or Canadian federal officials) Telephone: 780-412-5454 https://www.rcmp-grc.gc.ca/en/prevent-corruption-reporting</p> <p>Edmonton Police Service (bribes to Canadian municipal or provincial officials) Non-emergency line: 780-423-4567 https://www.edmontonpolice.ca/</p>
Employing and/or mistreating undocumented workers	<p>Border Watch Line Toll-free: 1-888-502-9060 https://www.cbsa-asfc.gc.ca/security-securite/bwl-lsf-eng.html</p> <p>Edmonton Police Service Emergency line: 9-1-1 Non-emergency line: 780-423-4567 https://www.edmontonpolice.ca/</p>

Complaint related to...	Contact...
Fraud or other criminal conduct	<p>Edmonton Police Service Non-emergency line: 780-423-4567 https://www.edmontonpolice.ca/CrimePrevention/PersonalFamilySafety/Frauds/ReportingFraud</p> <p>Canadian Anti-Fraud Centre Toll-free: 1-888-495-8501 https://antifraudcentre-centreantifraude.ca/report-signaliez-eng.htm</p>
Human trafficking	<p>Canadian Human Trafficking Hotline Toll-free: 1-833-900-1010 https://www.canadianhumantraffickinghotline.ca/submit-a-tip/</p> <p>Edmonton Police Service Emergency: 9-1-1 Non-emergency line: 780-423-4567 https://www.edmontonpolice.ca/</p>
Intellectual property infringement	<p>Law Society of Alberta Lawyer Directory https://lsa.memberpro.net/main/body.cfm?menu=directory</p>
Misuse of the Federal Temporary Foreign Worker Program or other immigration programs, including mistreatment of Temporary Foreign Workers	<p>Alberta Temporary Foreign Worker Advisory Office Toll-free: 1-877-944-9955 https://www.alberta.ca/temporary-foreign-workers</p> <p>Employment and Social Development Canada 24-7 tipline: 1-866-602-9448 https://www.canada.ca/en/employment-social-development/services/foreign-workers/report-abuse.html</p> <p>Edmonton Police Service Emergency: 9-1-1 Non-emergency line: 780-423-4567 https://www.edmontonpolice.ca/</p>
Non-compliance with environmental legislation	<p>Energy and Environmental Response Line 24-hour response line: 1-800-222-6514 https://www.alberta.ca/energy-and-environment</p>

Complaint related to...	Contact...
	al-response-line
Non-compliance with occupational health and safety legislation	OHS Contact Centre Toll-free: 1-866-415-8690 https://www.alberta.ca/file-complaint-online
Privacy violations	Office of the Information and Privacy Commissioner of Alberta https://oipc.ab.ca/request-a-review-file-a-complaint/
Racism, transphobia, homophobia, anti-Semitism, Islamophobia, or other human rights violations	Alberta Human Rights Commission Confidential Inquiry Line: 780-427-7661 https://albertahumanrights.ab.ca/
Tax evasion or tax avoidance	Canada Revenue Agency Toll-free: 1-866-809-6841 https://www.canada.ca/en/revenue-agency/programs/about-canada-revenue-agency-cra/suspected-tax-cheating-in-canada-overview.html
Unfair or illegal employment practices	Employment Standards Toll free: 1-877-427-3731 https://www.alberta.ca/employment-standards