

<b>Title</b>	<b>Safe Disclosure</b>		
<b>Classification</b>	Administrative	<b>Oversight Responsibility</b>	Office of the President
<b>Category</b>	Governance and Legal	<b>Responsible Office</b>	People and Culture
<b>Approval</b>	Board	<b>Effective Date</b>	June 20, 2024
		<b>Document No.</b>	1096

This policy is applied in a manner consistent with applicable statutory and legal obligations, including university collective agreements and terms of employment.

The most up-to-date versions of the university's policies are posted on the policy and procedure website. If you have printed this policy, check the website to ensure you have the current version.

**NOTE:** The first appearance of terms in **bold** in this document (except titles) are defined terms – refer to the Definitions section.

## 1.0 POLICY STATEMENT

The Board of Governors (Board) is committed to ensuring that Royal Roads University (University) adheres to the highest standards of ethical conduct and integrity. It is the responsibility of all **Members of the University Community** (University Community) to comply with applicable legal, legislative and regulatory requirements, and the University's policies, procedures and guidelines.

The University provides a mechanism for persons, acting in **Good Faith**, to make a **Safe Disclosure** of alleged **Improper Activity** and/or **Reprisal** within the University. Disclosures of alleged improper activity is taken seriously and managed in an objective and impartial manner. Moreover, the University provides protection from reprisal for persons who, in good faith, disclose alleged improper activity or participate in an investigation of alleged improper activity.

The purpose of this policy is to:

- identify a mechanism to raise serious concerns regarding alleged improper activity within the University where no other process exists under an **Alternate Policy**;
- enrich the University's commitment to accountability and transparency, its adherence to all applicable laws and university policies, and commitment to equity and inclusion;
- provide protection from reprisal to persons who, in good faith, make a safe disclosure; and
- promote public confidence in the administration of the University.

## 2.0 SCOPE

This policy applies to the University Community. The University expects that the University community will comply with this policy, including all requirements for disclosure. Failure to do so may constitute grounds for disciplinary action, up to and including termination of employment, appointment, contract or other relationship with the University.

## 3.0 LIMITATIONS

- 3.1 This policy shall not limit or amend the provisions of collective agreements entered into by the University and its employee groups.
- 3.2 This policy is not designed to question legitimate financial, administrative or business decisions taken by the University through its normal processes, nor should it be used to reconsider any

matters which have already been addressed under the appropriate policies, procedures, or collective agreements.

- 3.3 This policy is not intended to replace policies and procedures already in effect to deal with academic dishonesty, employee or student conduct, harassment, sexual violence or other related issues.

## **4.0 CONFIDENTIALITY**

Members of the University Community involved in the investigation of alleged improper activity must keep the details and results of the investigation confidential to safeguard and protect the rights of those involved in the allegations and preserve the legal validity of all evidence collected.

The University will protect the confidentiality of persons and events under investigation, except where disclosure is required by law. The details and particulars of any investigation will not be disclosed or discussed with any persons or parties other than those deemed necessary for investigation purposes, or as required by law.

## **5.0 POLICY TERMS**

- 5.1 In keeping with the University's commitment to accountability and transparency, the University will maintain an environment of safe disclosure for good faith reporting of improper activity.
- 5.2 Members of the University Community are often in the best position to observe improper activity because of their proximity to day-to-day university operations. The University relies on these persons to report improper activities in good faith so that the university can take prompt corrective action.
- 5.3 Concerns or allegations of alleged improper activity shall be reported within the applicable department/unit and addressed in accordance with the existing University policies, procedures and guidelines that govern the activity in question.
- 5.4 Generally, reports of alleged improper activity should be reported to the person's immediate supervisor or manager who must report the alleged improper activity to the Safe Disclosure Office.
- 5.5 Where a person does not wish to disclose directly to their immediate supervisor or manager, or an executive, the person may contact the Safe Disclosure Office.
- 5.6 The President must be advised of all reports of improper activity made under this policy unless the report is of misconduct on the part of the President, in which case the Chair of the Board of Governors must be advised of such a report.
- 5.7 Disclosures may be made anonymously, however, a decision to remain anonymous may impact the ability of the University to address the matter. The University cannot guarantee follow up or action on anonymous disclosures. To the greatest extent permitted by law and in the course of administrative fairness and equity, the privacy of persons involved in the disclosure process is protected.
- 5.8 Persons against whom allegations are made will maintain the rights, privileges and protections afforded to them through the Freedom of Information and Protection of Privacy Act (FOIPP) and other applicable legislation, university policies, and collective agreements in effect at the time of the alleged Improper Activity.

- 5.9 The University does not tolerate acts of reprisal against a person or persons who sought advice about an improper activity, made a safe disclosure, or participated in an investigation of a reported improper activity. reprisal is a serious contravention of this policy and persons found to have taken or participated in an act of reprisal are subject to disciplinary action up to and including termination of employment or contract.
- 5.10 Any person who knowingly makes an allegation of improper activity which is false, frivolous, vexatious or made in bad faith will be subject to disciplinary action, up to and including termination of employment or contract.

## 6.0 AUTHORITIES, ROLES, AND RESPONSIBILITIES

- 6.1 Board of Governors  
The Board of Governors is responsible to ensure the University has a policy for the Safe Disclosure of alleged improper activity and receives periodic reporting on activities under this policy.
- 6.2 Executive
- a. The President, as delegated by the Board, is responsible for executive oversight of this policy and leads the coordination of the University's safe disclosure program within the University's enterprise risk management framework.
  - b. The President and Vice-Presidents are accountable for promoting a culture of high standards of ethical conduct and integrity and supporting activities of safe disclosure regarding improper activity and/or reprisal.
- 6.3 President  
Administration of the Safe Disclosure Policy and processes are delegated to the President, whose responsibility is to:
- a. coordinate safe disclosure activities and procedures;
  - b. identify and appoint members of the Safe Disclosure Office;
  - c. monitor and report on safe disclosure through periodic review of program activities and trends; and
  - d. regularly report to the Executive Committee and Board of Governors on safe disclosure activity at the University.
- 6.4 Safe Disclosure Office  
The Safe Disclosure Office is responsible for the overall coordination of disclosures and preparing the reporting of findings for executive and board review.
- 6.5 Academic and administrative managers are responsible for establishing effective controls and procedures to prevent and detect improper activities; and to safeguard the University's assets and resources.

## 7.0 DEFINITIONS

For the purposes of this policy:

**Alternate Policy** means an existing university policy or agreement that addresses the suspected Improper Activity being reported.

**Good Faith** means an honestly intended action based on a reasonable belief and without ulterior motive.

**Improper Activity** means a wilful or deliberate act of commission or omission in the context of the university's activities that is or may be perceived as dishonest, unethical, irregular, a conflict of interest, abuse of public trust, unlawful, dangerous to any person or the environment, or adverse to the university's interests or reputation. Improper Activity includes, but is not limited to:

- failure to comply with university policy, procedure, regulatory or legal obligation;
- endangering health or safety;
- criminal activity;
- misuse of public funds or resources;
- improper conduct or unethical behaviour;
- theft, fraud, misappropriation of university assets, forgery, falsification or alteration of documents
- attempts to conceal an Improper Activity;
- personally accepting or seeking anything of material value from contractors, vendors or persons providing or seeking to provide goods or services to the university. For clarity, this shall not include free samples of teaching materials;
- knowingly authorizing, directing or counselling a person to commit or conceal an Improper Activity;
- obstructing a person from reporting an Improper Activity;
- knowingly making a malicious, frivolous, or vexatious disclosure;
- initiating or participating in an act of reprisal; and
- obstructing an investigation into a disclosure of Improper Activity or reprisal.

**Reprisal** means an act that has the intended or actual outcome to harass, discriminate, threaten, demote, discipline, suspend, dismiss, or otherwise adversely affect a person's employment, enrolment, working or learning environment, or denial of a benefit because the person made, or participated in an investigation of, a Safe Disclosure.

**Safe Disclosure** means a written or verbal submission of information reporting alleged Improper Activity and made in Good Faith in accordance with this policy and for which the university affords protection against reprisal.

**Members of the University Community** means members of the Board of Governors, employees, students, contractors, volunteers, guests, visitors and others who access and/or participate in University academic, administrative, and research activities and operations undertaken on behalf of the University on or off-campus.

## 8.0 INTERPRETATION

Questions of interpretation or application of this policy or its guidelines will be referred to the Office of the President.

## 9.0 RELATED DOCUMENTS

Royal Roads University Documents and Information

- Academic Integrity and Misconduct - Faculty and Staff Policy
- Bullying, Harassment, and Discrimination Policy
- Conflict of Interest in Research Policy
- Conflict of Interest Policy
- Corporate Social Responsibility Policy
- Sexual Violence and Misconduct Policy
- Standards of Conduct and Service for Employees and Contractors Policy

- Student Rights and Responsibilities Policy
- Privacy and Protection of Information Policy

Legislation and Information

- The [Royal Roads University Act](#)

### Review, Revision and Approval History

Date	Action
2020-Jun-25	Approved by the Board of Governors
2021-Nov-24	Reviewed by Governance and Nominating Committee
2021-Dec-14	Approved by the Board of Governors
2024-Jun-20	Approved by the Board of Governors; new effective date
2027-Jun-20	<b>Next Review</b>