

<b>Title</b>	<b>Public Interest Disclosure Act (PIDA)</b>		
<b>Classification</b>	Administrative	<b>Oversight Responsibility</b>	Office of the President
<b>Category</b>	Governance and Legal	<b>Designated Office</b>	People and Culture
<b>Approval</b>	Executive	<b>Effective Date</b>	2024-Dec-01
		<b>Document No.</b>	1102

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.

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 BC Public Interest Disclosure Act (PIDA) provides a mechanism for employees or former employees (**employees**) to disclose or seek advice about disclosing **serious or systemic wrongdoings** (wrongdoing). PIDA also provides legal protection from **reprisal** for employees who in **good faith** report a wrongdoing and employees who cooperate with an investigation. In compliance with PIDA, this policy and related procedures set out the process for requesting advice to report a wrongdoing, disclosing a wrongdoing, and cooperating with an investigation.

## 2.0 SCOPE AND COMPLIANCE

- 2.1 This policy applies to University employees.
- 2.2 Employees are expected to comply with applicable legal, legislative and regulatory requirements, and Royal Roads University's (University) policies, standards, procedures and guidelines. Non-compliance with this policy may result in appropriate action, managed in accordance with applicable laws and the University's policies, collective agreements, and contracts.

## 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 POLICY TERMS

- 4.1 The University:
  - a. adheres to the highest standards of ethical conduct and integrity and promotes a culture of honest, transparent, and accountable behaviour;

- b. protects the privacy of employees involved in requests for advice, disclosures of wrongdoing, and investigations, in accordance with applicable laws including PIDA and the Freedom of Information and Protection of Privacy Act (FOIPPA);
  - c. conducts investigations in accordance with procedural fairness and applicable laws and University policy, employee agreements, and collective agreements;
  - d. prepares reporting under this policy in compliance with PIDA and FOIPPA; and
  - e. will not tolerate acts of reprisal against a person or persons who sought advice about a wrongdoing, made a disclosure, or participated in an investigation of a wrongdoing.
- 4.2 Concerns or allegations of alleged wrongdoing are reported to the Designated Officer and addressed in accordance with this policy and related procedures.
- 4.3 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.
- 4.4 Any person who knowingly makes an allegation of wrongdoing 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.
- 4.5 The University will monitor government legislation and revise this policy as required. In any event, this policy will be reviewed at least once every three years.

## **5.0 AUTHORITIES, ROLES, AND RESPONSIBILITIES**

### **5.1 President**

The President, as delegated by the Board:

- a. leads the coordination of the University's PIDA program within the University's enterprise risk management framework;
- b. appoints the University's designated officer; and
- c. regularly reports to the Executive Committee and Board of Governors on PIDA disclosures and activity at the University.

### **5.2 Designated Officer**

The Designated Officer, as appointed by the President:

- a. oversees the management of and protects the integrity of this policy;
- b. provides advice to employees about making a disclosure of wrongdoing; and
- c. receives disclosures from employees;
- d. coordinates investigation activities with the Safe Disclosure Office; and
- e. monitors and reports on PIDA program activities and trends.

### **5.3 Safe Disclosure Office**

The Safe Disclosure Office:

- a. coordinates disclosure of wrongdoing investigations; and
- b. prepares the investigation findings report for executive and Board of Governors review.

## 6.0 DEFINITIONS

For the purposes of this policy:

**Employee** means

- a. a current employee of the University; or
- b. a former employee of the University if the wrongdoing occurred or was discovered by the former employee when the former employee was employed by the University.

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

**Serious or systemic wrongdoing** means

- a. A serious act or omission that, if proven, would constitute an offence under an enactment of B.C. or Canada;
- b. An act or omission that creates a substantial and specific danger to the life, health, or safety of persons or to the environment, other than a danger that is inherent in the performance of an employee's or health professional's duties or functions;
- c. A serious misuse of public funds or public assets;
- d. Gross or systemic mismanagement (i.e., mismanagement of funding, services, or people in a way that is highly inappropriate, irresponsible or reckless, or mismanagement that is broad, longstanding, recurrent or inherent to a public sector organization's culture and practices); or
- e. Knowingly directing or counselling a person to commit any of the wrongdoing described above, whether or not the person commits the act or omission.

**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.

**Disclosure** means a written or verbal submission of information reporting alleged serious wrongdoing and made in good faith in accordance with this policy.

## 7.0 INTERPRETATION

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

## 8.0 RELATED DOCUMENTS

Royal Roads University Documents and Information

- Public Interest Disclosure Act (PIDA) Procedures
- 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
- Student Rights and Responsibilities Policy
- Privacy and Protection of Information Policy

Legislation and Information

- [Public Interest Disclosure Act](#)

**Review, Revision and Approval History**

<b>Date</b>	<b>Action</b>
2024-Dec-17	Approved by Executive Committee; effective date is December 1, 2024 to coincide with BC Government direction; first implementation.
2025-Dec-17	<b>Next Review</b> (one year post-implementation)