

Title	Safe Disclosure		
Parent Policy	Safe Disclosure	Responsible Office	Office of the President
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Approval	President		

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

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

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1.0 INTRODUCTION

1.1 Purpose

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 including the **Public Interest Disclosure Act** (PIDA).

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 procedure 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.

1.2 Scope

This procedure applies to the University Community. The University expects that the University Community will comply with this procedure, 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.

2.0 DISCLOSURE PROCEDURES

2.1 Designated Officer

- a. The President designates the Executive Officer and AVP, People and Culture as the Designated Officer 1 (DO1) and the Associate Director, Human Rights and Accessibility as the Designated Officer 1 (DO2) for receiving and reviewing disclosures and managing investigations under this procedure for RRU.
- b. The DO may delegate their authority to another employee or a third party to assess and investigate disclosures at their discretion and as required in the circumstances.

2.2 Requests for Advice

- a. A member of the university community who is considering making a disclosure under this procedure, or has concerns about reprisal after making a disclosure under this procedure, may seek advice about doing so from:
 - i. their union representative or other employee representative;
 - ii. a lawyer;
 - iii. their supervisor; or
 - iv. a Designated Officer.
- b. Supervisors or Designated Officers may require the employee to make the request for advice in writing.
- c. Supervisors and Designated Officers will document all requests for advice received under the procedure and maintain a written record of the advice provided.

- d. Supervisors and Designated Officers are to clarify that a request for advice is being made under this procedure in cases where there is ambiguity.
- e. Members of the university community may wish to specify that they are requesting advice under the procedure.
- f. Employees who seek advice from the people set out above are protected from reprisal under this procedure. No person can adversely affect a person's employment or working conditions because the employee sought advice about making a disclosure.
- g. This protection applies whether or not the member of the university community decides to make a disclosure.

2.3 Making a Disclosure

- a. Members of the university community can make disclosures of improper activity and/or reprisal under this procedure for improper activity in or relating to the University:
- b. Members of the university community can make disclosures, in good faith, about improper activities that they reasonably believe have occurred or are about to occur.
- c. If a disclosure is made to a supervisor, the supervisor must forward it to a Designated Officer immediately. If a Designated Officer is the subject of the allegations, the supervisor will forward the disclosure to the other Designated Officer.
- d. Employees who wish to make a disclosure must do so in writing. Employees are encouraged to use the Disclosure Form. Disclosures must include the following information, if known:
 - i. a description of the improper activity;
 - ii. the name(s) of the person alleged
 - to have committed the improper activity, or
 - to be about to commit the improper activity;
 - iii. the date(s) of the improper activity;
 - iv. whether the information or conduct that is being disclosed relates to an obligation under another policy and, if so, a reference to the policy;
 - v. whether the improper activity has already been disclosed under this procedure or another policy; and
 - vi. if paragraph 2.3 v. applies, the name of the person to whom the disclosure was made and the response, if any, that has been received.
- e. Disclosures can also be made to a supervisor or a Designated Officer by email or mail.
- f. If an initial disclosure is not made in writing, the supervisor or Designated Officer will assist the discloser to document their disclosure using the Disclosure Form.

2.4 Anonymous Disclosures

- a. Disclosures may be made anonymously. While anonymous disclosures are permitted, those who may be considering making anonymous disclosures should be aware that it can be very difficult for the Designated Officer to follow up, which could impact the investigation of the disclosure.
- b. It is possible that an anonymous report will not contain adequate detail with respect to an allegation to enable a full and thorough investigation and the Designated Officer may be unable to seek clarification or further information if there is no way to contact the anonymous discloser. Additionally, the Designated Officer may be unable to advise an anonymous discloser of whether an investigation will be conducted, what steps may be taken in response, or the results of an investigation.

- c. If a discloser chooses to make a disclosure anonymously, they need to be anonymous from the start when they make the disclosure. An anonymous disclosure cannot contain any information which identifies the person who submitted it (such as their email address, personal address or name).
- d. If advice was previously sought under this procedure and the identify of the discloser is known to the person they sought advice from, they cannot ask to make the disclosure anonymously. The Safe Disclosure policy provides confidentiality and protections from reprisal to protect you if you make a disclosure.

2.5 Multiple Disclosers

- a. If multiple disclosers come forward at the same time regarding the same improper activity, the Designated Officer may assess and investigate the disclosures together as a single matter.
- b. The fact that multiple disclosers have come forward about the same alleged wrongdoing will not be shared with the other disclosers. Each discloser will have protections from reprisal under this procedure and will be interviewed separately.

2.6 Reprisal

- a. Reprisal is prohibited under the policy.
- b. Reprisals may include: a disciplinary measure, demotion, termination of employment or contract, and any other measure that adversely affects the discloser's employment or working conditions.
- c. Disclosers are protected from reprisals resulting from:
 - i. seeking advice about making a disclosure;
 - ii. seeking advice about concerns of reprisal;
 - iii. making a disclosure;
 - iv. reporting a reprisal; or
 - v. cooperating with an investigation in accordance with this procedure.

3.0 ASSESSMENT PROCEDURES

3.1 Designated Officer

- a. The Designated Officer is responsible for receiving disclosures and assessing whether they meet the threshold for improper activity.
- b. The Designated Officer will conduct this initial assessment prior to determining whether an investigation is warranted.

3.2 Initial Interview

- a. The Designated Officer will confirm receipt of a disclosure to a discloser within two (2) business days. The Designated Officer will conduct an initial interview with a discloser as soon as possible after receipt of a disclosure. The interview, and any subsequent interviews, will be conducted in a manner and place that maintains the confidentiality of the identity of the discloser.
- b. The purpose of the interview is to gather more information about the nature of the disclosure and to assess whether it meets the threshold for improper activity. The interview is also intended to inform the Designated Officer's assessment of the urgency of the matter, as well as an initial consideration of any risk of reprisal to the discloser.

3.3 Gathering Information

- a. The Designated Officer is responsible for reviewing the disclosure form or other written submission to ensure the information is complete.
- b. If the information is not complete, the Designated Officer will identify the information that is outstanding and ask the discloser to provide that additional information, if known.
- c. If the discloser makes their disclosure verbally, the Designated Officer will require the employee to follow-up with a written disclosure, as described in paragraph 2.3.4 above.

3.4 Assessing the Disclosure

- a. The Designated Officer will assess the disclosure to confirm the following:
 - i. the discloser is a member of the university community;
 - ii. the alleged wrongdoing occurred in or relating to the university;
 - iii. the allegations meet the threshold of improper activity; and
 - iv. the disclosure is in writing and contents of the disclosure are complete.
- b. If the Designated Officer determines that the allegations, if proven, would meet the threshold of improper activity, the Designated Officer will also consider whether there is a reasonable basis to support an investigation. The Designated Officer will assess whether the discloser has provided some evidence that could support a conclusion that the alleged improper activity occurred. Mere speculation on the part of the discloser without any evidentiary support does not suffice.

3.5 Deciding Whether to Investigate

- a. Once the assessment of a disclosure is complete, the Designated Officer must determine whether or not to investigate. The Designated Officer will decide whether to investigate within 30 days of receipt of the disclosure.
- b. If the Designated Officer concludes that the assessment will require more than 30 days, they will notify the President of the delay, reasons for the delay, and the expected date on which the assessment will be complete and a decision made.

3.6 No Investigation

- a. If the improper activity alleged does not relate to the University, the Designated Officer must refuse to investigate under this procedure.
- b. If the disclosure does not meet the threshold for improper activity under the policy, or there is no reasonable basis to support an investigation, the Designated Officer must refuse to investigate under this procedure.
- c. Where the disclosure meets the criteria, the Designated Officer must consider whether they are prohibited from investigating under this procedure.
- d. The Designated Officer is prohibited from investigating if the disclosure relates primarily to:
 - i. a dispute between an employee and the University respecting their employment;
 - ii. a matter relating to law enforcement;
 - iii. a matter relating to the prosecution of an offence; or
 - iv. an adjudicative function of a court, tribunal or other statutory decision maker, including a decision, or the processes or deliberations that have led to or may lead to a decision, by the court, tribunal or other statutory decision maker.

If any of the above circumstances apply, the Designated Officer must not investigate the disclosure.

- e. If the Designated Officer determines they are not prohibited from investigating, they will consider whether they should exercise their discretion to refuse to investigate applying the following discretionary considerations:
 - i. the disclosure does not provide sufficient details or particulars about the wrongdoing;
 - ii. the disclosure is frivolous or vexatious;
 - iii. the disclosure was not made in good faith;
 - iv. the investigation of the disclosure would serve no useful purpose or could not be reasonably conducted because the length of time that has passed between the date of when the subject matter of the disclosure arose and the date of the disclosure;
 - v. the disclosure relates solely to a public policy decision.
 - vi. the disclosure has been referred to another appropriate authority for investigation; or
 - vii. the disclosure has already been or is being appropriately investigated.
- f. The Designated Officer may seek additional sources or information to assist in determining whether or not an investigation is appropriate.
- g. The Designated Officer will notify the discloser of a decision not to investigate the disclosure and will provide reasons for their decision in writing.
- h. Where the Designated Officer decides not to investigate, the Designated Officer will consider whether there are other mechanisms available for addressing the discloser's concerns and provide that information to the discloser as appropriate.

3.7 Report to Law Enforcement

- a. The Designated Officer may report an alleged offence relating to a request for advice, a disclosure or a reprisal complaint under the Safe Disclosure policy or this procedure to a law enforcement agency if they have reason to believe an offence may have been committed. The offence may be reported regardless of whether the disclosure is determined to meet the threshold for improper activity or whether the Designated Officer decides to investigate the allegations. In assessing whether to make a report, the Designated Officer will consider the seriousness of the allegations and whether the alleged offence may be a criminal offence.
- b. The victim of any alleged offence will be consulted prior to a report being made, unless consultation poses health and/or safety concerns. Designated Officers may also wish to consider concerns about reporting to law enforcement in cases where persons involved belong to communities or groups that have historically been overpoliced.
- c. The Designated Officer will not report an offence without first consulting the President unless the President is implicated in the alleged offence.
- d. The Designated Officer will provide no more information to law enforcement than is necessary to make the report.

3.8 Postponing or Suspending an Investigation

- a. The Designated Officer may postpone or suspend an investigation if they:
 - i. report an alleged offence to law enforcement prior to, or during an investigation;
 - ii. consider that investigation may compromise another investigation; or
 - iii. become aware that the alleged wrongdoing being investigated is also being investigated in the prosecution of an offence.
- b. The Designated Officer must consult with the President prior to postponing or suspending an investigation unless the President is implicated in the wrongdoing.
- c. The discloser must be notified of the decision to postpone or suspend an investigation, unless the Designated Officer considers that the notification would compromise another investigation.

4.0 INVESTIGATION PROCEDURES

If the Designated Officer decides a disclosure warrants investigation under this procedure, the Designated Officer must investigate in accordance with of these procedures, and in accordance with the principles of procedural fairness and natural justice.

4.1 Notifying Parties

a. Notice to Discloser

The Designated Officer must notify the discloser of the decision to investigate. The notification may be brief and may be provided orally or in writing. The notification will include the scope of the investigation. If only part of the disclosure will be investigated, the Designated Officer will provide the discloser reasons for their decision not to investigate the remaining portions of the disclosure.

b. Notice to President

- i. Generally, the Designated Officer will provide notice to the President of the decision to investigate. Notice may be delayed until an appropriate time if the Designated Officer considers that notification may compromise the investigation or expose the discloser to reprisal.
- ii. If the President is alleged to be responsible for the improper activity, the Designated Officer will notify the chair of the board of directors, or an executive officer or a person occupying a comparable position with respect to Royal Roads University.

c. Notice to Respondents

The Designated Officer will notify any respondents that their conduct is the subject of an investigation at an appropriate time, taking into account the need to protect the integrity of the investigation and the respondents' rights to procedural fairness. Respondents will in all cases receive notice of the allegations prior to being interviewed.

4.2 Requiring Another Body to Suspend or Postpone an Investigation

- a. This procedure does not limit the authority of a public body to undertake other investigations while a Designated Officer investigates a disclosure of improper activity. However, where there is prima facie evidence that a public body undertook an investigation in order to compromise an investigation of a disclosure under this procedure, the Designated Officer may require the public body to suspend or postpone its investigation.
- b. The Designated Officer will not suspend or postpone another investigation without first consulting the President, except in circumstances where the President is implicated in the wrongdoing.

4.3 Maintaining Confidentiality

- a. Designated Officers and supervisors may collect, use and disclose personal information for the purpose of this procedure where the personal information is included in a disclosure or is for the purpose of an investigation or report.
- b. Information about the identity of the discloser is confidential. No person may share personal information about a discloser that could enable the identification of the discloser as the person who made the disclosure, unless:
 - i. the provision or use of the information is for the purposes of the Act, including as necessary to effectively manage the disclosure in accordance with this procedure and the principles of natural justice and procedural fairness;
 - ii. the provision or use of the information is in connection with another lawful purpose;
 - iii. the discloser has given express consent, in writing, to the release or use of the personal information; or
 - iv. the personal information has previously been lawfully published.

- c. Where necessary to effectively carry out an investigation, a Designated Officer may share that the discloser was a witness and a source of evidence. Wherever possible, the Designated Officer will not share or confirm that the discloser made the disclosure.
- d. The Designated Officer will explain confidentiality provisions to the discloser.
- e. Information and documents obtained in the disclosure process will be stored in a safe and secure manner and must be protected from unauthorized access, use and disclosure.

4.4 Obtaining Documentary and Written Evidence

The Designated Officer will seek to obtain information in the order, format and fashion that they determine is most appropriate and effective. They may contact whomever is most appropriate to obtain records related to the allegations.

4.5 Conducting Interviews

a. General

- i. Interviews of disclosers, respondents and witnesses will be conducted in the order and format (i.e., in-person, telephone or video) appropriate for the circumstances. Efforts should be made to accommodate the individual's preferences and accessibility needs.
- ii. Interviewees will be provided notice of an interview date, time and place along with the general nature of the interview. Interviews may be held outside the workplace as necessary to maintain confidentiality and the integrity of the investigation.
- iii. In some cases, it may be necessary for the Designated Officer to provide the interviewee with copies of documents in advance of the interview, including where doing so will enhance the effectiveness of the interview and/or to accommodate the interviewee's needs.
- iv. The Designated Officer will remind each witness of the prohibition against reprisal as stated in the policy.

b. Respondent Interviews

- i. Respondents are afforded a high level of procedural fairness. They must be provided notice that they are under investigation and the opportunity to respond to the allegations against them. If documents will be discussed in an interview with a respondent, the Designated Officer will consider providing advance opportunity for the respondent to review the documents unless they have reason to believe that doing so could compromise the investigation.
- ii. If, during an interview of a witness, the Designated Officer receives information that raises concerns that the witness may be implicated in improper activity, they must stop the interview and inform the person of this concern. The person will then be treated as a respondent and provided the same level of procedural fairness provided to all respondents. The interview will be rescheduled to allow sufficient time for the person to prepare for the interview and seek advice should they choose.

c. Presence of Third Parties

- i. Interviewees are permitted to have a support person present during the interview, such as a family member or friend. Requests for the attendance of a union representative or lawyer will be considered on a case-by-case basis.
- ii. Interviewees must obtain permission for any third party to attend at least 5 days in advance of the scheduled interview. Third parties may not be permitted in an interview in the following circumstances:
 - they are a witness or respondent in the investigation,
 - they were not requested by the interviewee to attend,

- they did not receive permission to attend, or
- their presence would present a conflict of interest or jeopardize the integrity of the investigation.

4.6 Investigating Other Wrongoings

If, during an investigation, the Designated Officer reasonably believes that another wrongdoing has been committed, the Designated Officer may investigate that wrongdoing. The same policies and procedures that apply to disclosures, with necessary modifications, will apply to other potential wrongoings identified during the course of an investigation.

4.7 Discontinuing an Investigation

At any time after an investigation has commenced, the Designated Officer may discontinue an investigation for the reasons set out in paragraphs 3.7 above. If the Designated Officer decides not to complete an investigation after it has begun, the discloser must be notified of the decision to discontinue the investigation. Notice will be provided in writing, setting out the reasons for discontinuing the investigation.

4.8 Timelines

Investigations will be completed, and a draft report prepared within four months from the decision to investigate. If the Designated Officer concludes that the investigation will require more than four months to complete, they must notify the President of the delay, reasons for the delay, and the expected date on which the investigation will be completed.

5.0 REPORTING PROCEDURES

5.1 Draft Investigation Report

- Upon conclusion of gathering, reviewing and analyzing evidence, the Designated Officer will prepare a draft investigation report. The report will include the allegations, applicable laws and policies, evidence, analysis, findings and any recommendations to address findings of wrongdoing, as applicable.
- Recommendations may be developed through a consultative process between the Designated Officer and the President.

5.2 Draft Report to Person(s) Adversely Affected

- In accordance with the principles of procedural fairness, the Designated Officer will provide all those who may be adversely affected by any findings or recommendations in the investigation report with the opportunity to make representations before it is finalized. Representations may be provided orally or in writing.
- Generally, the President, any respondents and other individuals who may be adversely impacted by the investigation report will be provided the opportunity to make representations. The Designated Officer may provide a copy of the draft report, excerpts of the report, or a summary of evidence and findings as the context requires.
- The Designated Officer will review and consider all representations received before finalizing the investigation report.

5.3 Final Reports

- The final investigation report will be provided to the President, unless the President is implicated in founded improper activity. If the President is implicated in founded improper activity, the report will be provided to the chair of the board of directors, an executive officer or a person occupying a comparable position with respect to Royal Roads University.

- b. The final investigation report must include:
 - i. the findings;
 - ii. the reasons to support the findings; and
 - iii. any recommendations.
- c. The President will consider the findings and recommendations and take corrective measures to remedy the wrongdoing and any other deficiencies identified in the report. Where the President declines to take corrective measures, they will set out the reasons for declining to do so in the annual report.
- d. The Designated Officer will provide a summary of the investigation report to the discloser. Where practicable, the Designated Officer will also provide a summary of the report to any person alleged or found to be responsible for wrongdoing. The kind of information and level of detail contained in the summary will be decided by the Designated Officer in consultation with the President, on a case-by-case basis.

5.4 Reporting

- a. The President, or delegate, will report regularly on all disclosures of wrongdoing received and investigated with respect to the University to the board of governors. The report must include:
 - i. the number of disclosures received, including referrals of disclosures, and the number acted on and not acted on;
 - ii. the number of investigations commenced as a result of a disclosure;
 - iii. in the case of an investigation that results in a finding of wrongdoing,
 - a description of the wrongdoing,
 - any recommendations, and
 - any corrective action taken in relation to the wrongdoing or the reasons why no corrective action was taken;
 - iv. any other information prescribed by regulation.
- b. The report must not include any information that would
 - i. identify the discloser;
 - ii. identify a respondent; or
 - iii. unreasonably invade a person's privacy.

6.0 ROLES AND RESPONSIBILITIES

6.1 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.

6.2 Designated Officer

The President designates the Executive Officer and AVP, People and Culture and the Associate Director, Human Rights and Accessibility for receiving requests for advice, receiving disclosures and investigating disclosures under this procedure.

6.3 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. People and Culture will align implementation of this Procedure including, but not limited to:

- a. identifying roles and responsibilities for receiving and acting on Disclosures in accordance with the direction of this Procedure;
- b. receiving Disclosures as set out in this Procedure;
- c. undertaking a review following receipt of a Disclosure to determine the appropriate action;
- d. maintaining all communications with parties to a Disclosure;
- e. setting criteria for decisions to request further information, to proceed to investigation, to refer to another body for action, to dismiss the matter if found without merit, and to close;
- f. coordinating investigations and all report preparation;
- g. identifying investigation processes and responsibilities;
- h. maintaining records necessary to ensure confidentiality and the effective management of the Disclosure process; and
- i. reporting monthly to the Executive and annually to the Executive and Board of Governors on Safe Disclosure activities within the University, including recommendations on any policy updates or other process improvement considerations.

6.4 Supervisors

Per this Procedure, supervisors are responsible for forwarding Disclosures they receive to the Responsible Office within twenty-four (24) hours of receiving.

6.5 Employees

It is the responsibility of employees to immediately report any serious wrongdoing.

7.0 DEFINITIONS

For the purposes of this procedure:

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.

Designated Officer means the Executive Office & AVP, People & Culture or Associate Director, Human Rights and Accessibility

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 procedure 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.

Discloser means a member of the university community who makes a disclosure of improper activity or seeks advice about making a disclosure under the policy.

Disclosure means a disclosure made by a discloser in accordance with the policy.

Respondent means a person alleged or found to have committed wrongdoing.

8.0 INTERPRETATION

Questions of interpretation or application of this procedure will be referred to the Responsible Office.

9.0 RELATED DOCUMENTS

Royal Roads University Documents and Information

- Safe Disclosure Policy
- Privacy and Protection of Information Policy
- Public Interest Disclosure Policy
- Public Interest Disclosure Procedure

Legislation and Other Information

- [Public Interest Disclosure Act](#)

Review, Revision and Approval History

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