

**Name:** Safe Disclosure Policy  
**Policy Number:** 12-009  
**Approving Authority:** Board of Governors  
**Approved:** March 24, 2023  
**Responsible Office:** President  
**Responsibility:** University Secretary & General Counsel  
**Revision Date(s):** Not Applicable  
**Supersedes:** Not Applicable  
**Next Review:** March 23, 2026

- iv. Financial misconduct, including but not limited to:
  - 1) theft, misapplication, or misappropriation of University assets;
  - 2) destruction, removal or concealment of University records or property for personal gain;
  - 3) forgery, falsification or alteration or inappropriate destruction of finance-related documents;
  - 4) accepting or seeking anything of material value from contractors, vendors or persons providing or seeking to provide goods or services to the University for personal gain or benefit. For clarity, this shall not include free samples of teaching materials; and
  - 5) authorizing or receiving payments for goods not received, services not performed, or hours not worked.
  
- c. **Reprisal** means any act of intimidation, harassment, discipline, or retaliation towards any individual related to a Good Faith Disclosure and includes, without limitation, any demotion, suspension, termination, or any actual or threatened action that adversely affects the employment or learning environment of any faculty, staff or student, or the working conditions or contractual arrangements of a contractor or supplier.

#### 4. Policy:

- a. **Commitment to integrity:** Saint Mary's University is committed to conducting its activities and managing its resources with integrity and in accordance with all applicable legislative and regulatory requirements and University policies. All persons subject to this Policy are expected to act with integrity and to deal with University assets and resources in a fiscally responsible manner, in compliance with applicable legislative and regulatory requirements and University policies.
  
- b. **Disclosure of Improper Activity:**
  - i. To support the University's commitment to integrity, accountability, and transparency, any faculty, staff, student, volunteer, contractor, or supplier who has reasonable grounds to believe that Improper Activity has occurred or will occur is entitled and encouraged to make a Good Faith Disclosure. Good Faith Disclosures should, wherever possible, be made directly to the relevant academic or administrative unit or supervisor.
  - ii. Nothing in this Policy relieves those responsible for the administration and management of academic, administrative, or service departments from the responsibility of addressing situations of Improper Activity in accordance with good management practices and existing policies, guidelines, and procedures. It is also the expectation that members of the University community will continue to use existing channels to report Improper Activity and only resort to this Policy if such channels prove ineffective or are inappropriate in the circumstances.
  - iii. Where an individual does not wish to disclose directly to the relevant unit or supervisor, the individual may make a Good Faith Disclosure under this Policy in accordance with the Safe Disclosure Procedures.
  - iv. The University will use reasonable efforts to keep the details of a Good Faith Disclosure confidential, including the identities of all participants in an investigation of wrongdoing, including the persons making the Good Faith Disclosure, witnesses, and the persons alleged to be responsible for wrongdoing, and any details of the alleged misconduct that could identify persons, to the extent permitted under legislation, regulations, University policy and collective agreements. All participants in an investigation of alleged Improper Activity, including persons who make a disclosure, witnesses, and the persons alleged to





reasonable grounds to investigate and whether there is any reason to believe the disclosure is not made in good faith.

#### **4. Confidentiality of disclosures**

As set out in Section 4 of the Policy, the University will endeavor to protect the confidentiality of the discloser and any participants in an investigation, subject to any of the requirements of any collective agreements, University policies or applicable legislative and regulatory requirements.

#### **5. Investigations**

If the disclosure is determined to have reasonable grounds and to have been made in good faith, within 5 business days of the determination the disclosure will be:

- a. Referred to the appropriate policy owner for investigation pursuant to the applicable policy; or
- b. Referred to the University Secretary for investigation if there is no applicable policy; or
- c. If it is determined to be appropriate, referred to an external investigator.

If the disclosure is determined to lack reasonable grounds to investigate or to have not been made in good faith, the University may decline to investigate further, and the University Secretary will notify the discloser of this decision if contact information or a mechanism for contacting the

**PART C**

**Reporting of disclosures**

**8. Investigation reports**

Any investigation conducted in response to a disclosure under the Safe Disclosure Policy must result in a written report which shall be provided to the applicable administrators under the relevant policy and in all cases to the President and the University Secretary.

**9. Reporting to Board**

The University Secretary shall annually provide a report to the Audit and Risk Committee of the Board of Governors. The confidential summary report will include a summary of the number, nature and disposition of all investigations made under this Policy, but will exclude personal information. This report, together with any recommendations, will be provided3y -0.011 Tw 0.554 will