

Procedure Number:	1514p
Procedure Title:	Safe Disclosure Procedure
Approved by:	President
Approval date:	January 12, 2023
Effective date:	January 12, 2023
Review date:	January 12, 2028
Next review date:	January 12, 2028

1. Purpose

1.1. The Procedures are designed to support the Safe Disclosure Policy.

2. Reporting Concerns

2.1. Individuals who are aware of or have reason to suspect any Wrongdoing at the University should report their concerns as soon as practicable.

2.2. Suspected or actual Wrongdoing should be reported either verbally or in writing to the Office of the Chief Compliance Officer of GUS Canada (the “Office of the CCO”), using one of the following methods:

E-Mail: compliance@GUSCanada.ca

Phone/Voicemail: 778-653-0966

Mail: Chief Compliance Officer of GUS Canada, c/o University Canada West, 1461 Granville Street, Vancouver, BC, V6Z 0E5, Canada

2.3. Reports to the Office of the CCO under section 2.2 are Protected Disclosures, and may be made either anonymously or with identifying information.

2.4. Alternatively, Employees, members of the University Community, and Contractors may also raise the matter directly with the President of UCW if they have reasonable grounds for believing that the Office of the Chief Compliance Officer of GUS Canada (the “Office of the CCO”) is involved in the alleged Wrongdoing.

2.5. In the further alternative, Employees may also report suspected or actual Wrongdoing in writing directly to their supervisor or manager. Students may report suspected or actual Wrongdoing in writing directly to the Chair of their program or to the Ombudsperson. Supervisors, managers, Chairs, and the Ombudsperson must promptly share the Protected Disclosure of the alleged Wrongdoing in writing to the Office of the CCO.

2.6. Individuals must provide factual information to substantiate their Protected Disclosures and to share any evidence supporting their allegations. Characterization of conduct is not sufficient.

- 2.7. The Office of the CCO is responsible for investigating Protected Disclosures in a timely manner and taking any actions it deems appropriate following the receipt of such Protected disclosures. This may include reporting the Protected Disclosure to the UCW President and Board, where appropriate.

3. Investigations

- 3.1. The Office of the CCO will attempt to notify the disclosing individual (when identity is known) to acknowledge receipt of the Protected Disclosure. When appropriate, the Office of the CCO shall inform the external agencies or authorities and internal bodies of the receipt of the Protected Disclosure.
- 3.2. All Protected Disclosures will be promptly investigated, and appropriate corrective action will be taken when warranted by the investigation.
- 3.3. The Office of the CCO shall determine the scope, manner, and parameters of any investigation.

4. Confidentiality

- 4.1. Employees are encouraged to identify themselves when making a Protected Disclosure to facilitate the investigation of the allegations. It may not be possible for the Office of the CCO to conduct a complete investigation where a Protected Disclosure is anonymous.
- 4.2. Protected Disclosures of suspected or actual Wrongdoing will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation. Whether or not an employee's identity can be fully protected will depend upon the nature of the allegations. While every effort will be made to respect an employee's wish to remain anonymous, no guarantee of confidentiality can be made given the investigation process.
- 4.3. Employees interviewed under this Policy are expected to treat the matter confidentially and refrain from discussing it in the workplace or elsewhere.
- 4.4. The investigation's content and results will be kept confidential to the extent authorized or required by law. Information sharing will be restricted to those who have a clear need to know.
- 4.5. Confidentiality violations or suspected violations may be submitted by an Employee through the Reporting Process in section 2.1.

5. Good Faith / No Retaliation Policy

- 5.1. Anyone reporting a suspected or actual Wrongdoing must act in good faith and have reasonable grounds for believing that the information disclosed may indicate Wrongdoing. Any False Allegations will be viewed as a serious disciplinary offence subject to discipline up to and including termination of employment.

- 5.2. The University will ensure that no Employee, member of the University community, or contractor who in good faith reports a concern will suffer intimidation, harassment, retaliation, discrimination, or adverse employment consequences because of such Protected Disclosure.
- 5.3. Any employee of the University who retaliates against someone who has reported a suspected or actual Wrongdoing in good faith is subject to discipline up to and including termination of employment.

6. Financial Misuse Investigations

- 6.1. The Office of the CCO must immediately notify the Vice President Administration of the University of any suspected or actual Wrongdoing regarding financial misuse, including but not limited to fraud, theft, embezzlement, bribery, kickbacks, corporate accounting irregularities or practices, or auditing irregularities or practices.

7. Record Keeping

- 7.1. The Office of the CCO will retain on a strictly confidential basis for a period of seven (7) Years (or otherwise as required under the University's record retention and disposal policies) all records relating to any Protected Disclosure, the investigation and resolution thereof.
- 7.2. All such records are confidential to the University, and such records will be considered privileged and confidential unless disclosure is required by law.