



**VICTORIA UNIVERSITY**  
IN THE UNIVERSITY OF TORONTO

## Safe Disclosure Policy

**Approval Authority:** Victoria University Board of Regents

**Effective Date:** October 13, 2016

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# Safe Disclosure Policy

## *Policy*

Victoria University (the “University”) wishes to ensure that any Wrongdoing on the part of University representatives is reported, investigated, and dealt with in a fair, expeditious and appropriate manner. The University recognizes that in some circumstances an individual aware of such Wrongdoing may be reluctant to report it through normal administrative channels for fear of personal or professional Reprisal. This document describes the means by which such an individual may make a “safe” Disclosure through the use of a protected and approved reporting mechanism.

## *Scope of Policy*

This policy may be invoked by any member of the University community who considers that they may be subject to Reprisal should they make a Disclosure of Wrongdoing through normal administrative channels.

The subsequent Disclosure may identify Wrongdoing on the part of any individual (employee, contractor, volunteer or other) who is employed or otherwise compensated by the University, or who may be seen to represent the University through their activities.

## *Related Documents*

Administrative Procedure – Disclosure: Describes the detailed mechanism by which wrongdoing will be reported and investigated in accordance with this policy.

Other administrative and human resources policies or collective agreements may provide additional guidance and protection.

## *Requirements*

All members of the University community who have reasonable grounds to believe that Wrongdoing has occurred, and that they are at risk of Reprisal if they report it through normal administrative channels, may make a Disclosure as described in this policy.

The Disclosure should be clearly identified as falling under this policy in order to ensure that proper procedures are followed and protection against Reprisal is ensured.

Disclosure should be made at the administrative level closest to the perceived Wrongdoing; where this is not feasible because of the risk of Reprisal, it should be made at the next appropriate administrative level. Administrative levels to consider are:

- The next appropriate supervisor or manager;
- The Bursar and Secretary of the Board;
- The President of the University;
- The Chair of the Audit Committee of the Board ([vic.audit.chair@utoronto.ca](mailto:vic.audit.chair@utoronto.ca))

The University will take all necessary and appropriate steps to fairly and promptly investigate and respond to any Disclosures, while using all reasonable efforts to protect the identity of the person making the Disclosure (the “Claimant”).

Further, the University will investigate and take all appropriate action within existing employment policies to address any allegations of Reprisal made subsequent to a Disclosure under this policy.

Any person who knowingly makes a false, frivolous, vexatious, or bad faith allegation of Wrongdoing will be subject to appropriate disciplinary action in accordance with relevant employment policies.

## *Definitions*

Wrongdoing: Any gross financial or related misconduct, breach of University policy, and/or violation of legal or regulatory requirements.

Disclosure: Any disclosure made under this Policy concerning an actual or perceived Wrongdoing that is based on reasonable belief and is not malicious, frivolous, vexatious, or made in bad faith.

Reprisal: Any adverse reaction or retaliation taken against an individual for making a Disclosure.