

## Safe Disclosure Reporting Mechanism – Operating Guidelines

### Reporting of Alleged Illegal or Unethical Behavior

- All suspected illegal or unethical behavior should be reported, and employees and other USask members are encouraged to talk to or contact their immediate supervisor, department/unit head, dean/director, or other appropriate USask personnel identified below about suspected and/or observed behavior that they believe may be illegal or a violation of USask policy; or when the employee or other USask member is in doubt about the best course of action to take in a particular situation.
  1. USask members (including students) are expected to report any known or suspected violations of USask policy, applicable laws, rules, or regulations. Generally, reports of suspected violations should first be directed to the employee's immediate supervisor. This may encourage the resolution of the employee's concerns within the applicable department/unit. Reports from students should be made to the Dean, Executive Director or designate of the student's College or School; or alternatively to the Provost and Vice-President (Academic).
  2. If, for any reason, an employee or student is not comfortable reporting the matter through the above reporting channels, they should contact one of the following USask personnel: USask Internal Auditor, AVP People and Chief Human Resources Officer, Director of Protective Services, or a Safe Disclosure Officer.
  3. USask members who are not employees or students, should contact one of the following personnel to report concerns or allegations: Safe Disclosure Officer, USask Internal Auditor, Director of Protective Services, Vice-President (Administration) and Chief Operating Officer, Chief Financial Officer, Provost and Vice-President (Academic), the President, or any member of the Board of Governors.
  4. If a USask member is not comfortable with the above reporting options, or wishes to report a matter confidentially or anonymously, they may contact USask's Safe Disclosure Hotline, either by telephone at 1-844-966-3250 or via the web page at [www.safedisclosure.usask.ca](http://www.safedisclosure.usask.ca). Internet reporting is via a SSL encrypted site to ensure security. This Hotline is available 24 hours a day, 7 days a week. It is a multilingual service that provides a safe place to report concerns. All Hotline reports are handled confidentially, and can be made anonymously to the extent permitted by law. The reporting individual's IP address and caller ID are not stored to ensure anonymity. All information reported to the Hotline is maintained in a secure environment; and access to the confidential data is username/password protected.

- All reports of alleged wrongdoing should include the following information:
  1. A description of the alleged wrongdoing.
  2. The name(s) of the individual(s) alleged to have committed the wrongdoing.
  3. The date(s) of the alleged wrongdoing.
  4. The particulars, and any supporting documentation, of any previous related disclosures that have been made either to USask personnel, the external Safe Disclosure Hotline, or other external individual or entity.
  5. Any evidence or documentation supporting the alleged wrongdoing.
  6. Any other available information relevant to the assessment of the allegations.

### **Confidentiality, Impartiality and Protection from Reprisal**

- USask will ensure that individuals who make reports in good faith are not subjected to retaliation in any form, such as termination, demotion, harassment, or exclusion from promotion. USask will investigate and take all appropriate action to address all allegations of reprisal. However, any individual that is found to be responsible for making malicious or bad faith allegations/reports may be subject to disciplinary action up to, and including, dismissal. When requested, members of the USask community are expected to cooperate in all internal or external investigations of misconduct or wrongdoing.
- Any person who believes that he or she has been subject to reprisal as a result of reporting an alleged wrongdoing should immediately provide documented details to the Safe Disclosure Officers. The Safe Disclosure Officers will ensure that all allegations of reprisal are investigated, and, if justified, that appropriate corrective action is taken, in accordance with USask procedures and protocols.
- During any subsequent investigation of a report, USask will not reveal that the investigation is as a result of a tip received, to maintain the anonymity and confidentiality of the reporting individual.
- USask will take all necessary and appropriate action to carefully and fairly review, investigate and respond to reports of alleged wrongdoing.
- Any persons involved in allegations of wrongdoing will be treated fairly and impartially, and will maintain all rights, privileges and protections that are provided to them under legislation, USask policies and collective agreements in effect at the time of the alleged wrongdoing.

**Receipt, Review and Recording of Disclosure**

- All incident reports received through USask's safe disclosure reporting mechanism will be provided to the two (2) designated University Safe Disclosure Officers within 24 hours of being reported. The dual dissemination of incident reports will serve as a system of checks and balances at USask. The University Safe Disclosure Officers will review and record the incident report information (including the name and contact information of the discloser, where anonymity has not been requested) in the internal Safe Disclosure database, and will forward the incident report to the appropriate USask official, within 10 days of receipt, for review and investigation, according to established USask procedures and protocols.
- All incident reports received through USask's safe disclosure reporting mechanism will be internally maintained in the same comprehensive electronic case management system. Each reported incident will receive a unique reference number so that a follow-up can be entered as received. Each reported incident will include the following information: date the report was submitted, description of report complaint, submitted by (if known), current status (resolved, under investigation, dismissed, withdrawn, pending/no action), and actions taken (date and comments). An on-demand case management system will facilitate USask's ability to analyze reported incident data/information, effective management of the investigation and resolution process, testing by Internal Audit, and oversight by the Audit and Finance Committee.
- All reports of alleged wrongdoing, whether received internally by a USask employee, or through the external safe disclosure reporting mechanism, will be dealt with in accordance with existing USask policies, procedures and processes.

**Reporting to USask's Audit Committee and Board of Governors**

- At the end of each fiscal year, the USask Internal Auditor, with input from USask's Safe Disclosure Officers, will provide the Audit and Finance Committee of the Board of Governors with a written report that includes the following:
  1. The number of safe disclosure reports received
  2. The number of reports investigated
  3. The findings of any corresponding investigations
  4. Any actions taken pursuant to an investigation, and the corresponding results.
- This report shall respect the privacy of all individuals involved in the reported incidents.

**Management of Safe Disclosure Report Information**

All safe disclosure report data and information will be managed and retained in accordance with USask's Management of University Records policy.