



**VICTORIA UNIVERSITY**  
IN THE UNIVERSITY OF TORONTO

## Safe Disclosure Procedure

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

**Effective Date:** October 13, 2016

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# Safe Disclosure Procedure

## *Policy*

This document should be read in conjunction with the Victoria University Administrative Policy – Safe Disclosure.

## *Disclosure*

In accordance with the Safe Disclosure Policy, all members of the University community who have information and reasonable grounds to believe that there has been Wrongdoing are encouraged to make a Disclosure to persons in authority at the University (see Policy for guidance).

Disclosures should be made in a timely manner, and should be in writing and signed.

## *Investigation*

The supervisor or manager to whom a Disclosure has been made shall notify either the Bursar and Secretary of the Board or the Chair of the Audit Committee of the Board, who shall then be responsible for the review and investigation of the Disclosure (the “Investigator”).

The Investigator shall make all reasonable efforts to ensure that confidentiality and privacy are respected throughout the investigation.

The Investigator will consider whether the Disclosure is outside of the scope of the reference policy, and whether it may be resolved by reference to other University policies or guidelines which more appropriately address the reported Wrongdoing.

The Investigator is entitled to require the individual making the Disclosure (the “Claimant”) to meet with him or her for the purpose of discussing the allegation and collecting all available information supporting the allegation. The Investigator shall also be entitled to request a confidential meeting with any member of the University community who may have relevant knowledge of the matter.

The Investigator will have access to the external auditor of the University, external legal counsel, and such other advisors as deemed necessary to complete the investigation.

The Investigator shall submit a written report to the University President outlining his or her findings and recommendations. Where there is a finding of Wrongdoing, the President shall provide relevant information to the appropriate supervisor or manager for a determination on discipline. Any report that directly or indirectly implicates the President in Wrongdoing should be sent directly to the Chair of the Finance and Audit Committee.

To maintain confidentiality, the results of individual investigations will be reported only to those parties with a need to know as determined by the President/Chair of the Finance and Audit Committee

## *Reporting*

The Bursar and Secretary of the Board shall annually provide a report to the Finance and Audit Committee of the Board at its fall meeting, such report including a summary of the number, nature and dispositions of all investigations made under this policy. Following review by the Audit Committee the report, together with any recommendations, will be provided to the Board of Regents in camera.