

Queen's University Policy and Procedures for Safe Disclosure Reporting and Investigation

Approved by Senate January 20, 2011
Ratified by the Board of Trustees March 4, 2011

1. Rationale

Queen's University seeks to promote a culture of honesty, transparency, and accountability, maintaining high ethical standards in all of its activities. The University recognizes that the good-faith reporting of alleged Improper Acts is a necessary and valuable service to the

5. Procedure for Reporting and Investigating a Report of an Alleged Improper Act

Stage 1

A Discloser should contact the Safe Disclosure Officer in the University Secretariat to make a confidential report of an alleged Improper Act.

The Safe Disclosure Officer shall review the following with the Discloser:

- a. These procedures;
- b. Other existing procedures, if applicable, for dealing with this matter;
- c. Confidentiality protections and required exceptions relating to the safety and/or security of the University Community;
- d. The commitment of the University to protect the Discloser from reprisal to the extent possible.

Anonymous reports will be accepted, but a Discloser's decision to remain anonymous or to request that his or her name not be disclosed by the Safe Disclosure Officer may influence the subsequent investigation of the alleged Improper Act.

Stage 2

The Safe Disclosure Officer shall compile a written report which shall include:

- a. The date and time the disclosure was received;
- b. Name and contact information of the Discloser (unless the Discloser is anonymous or has requested that his or her name not be disclosed by the Safe Disclosure Officer);
- c. Name(s) of the person(s) involved in the alleged Improper Act (the "Respondent"); and
- d. Full details of the alleged Improper Act, including a description and dates if known; and
- e. Any other available information relevant to an assessment of the report.

The Safe Disclosure Officer shall submit the written report to the appropriate Responsible Officer within ten (10) days of the receipt of the disclosure of an alleged Improper Act.

Stage 3

The Responsible Officer shall decide on a course of action regarding the report within fifteen (15) days of receipt. If the Responsible Officer finds that the report has insufficient details to support a decision, the Responsible Officer may meet with the Safe Disclosure Officer to determine if further details are available from the Discloser within this time frame in order to seek clarification or to obtain further information. The Responsible Officer will:

- a. Determine whether any interim measures should be initiated to protect Members of the University Community or the public, or to protect or secure funds or property that belong to the University or for which the University is directly or indirectly responsible. The initiation of such measures shall be without prejudice to the rights of the Respondent;

no further investigation is necessary, all documents related to the investigation shall be destroyed.

Stage 5

If the Responsible Officer determines that the Investigator should be asked to investigate further:

- a. The Investigator shall identify and obtain any additional records needed in order to pursue further investigation. The Respondent shall be given access to all materials received from the Discloser and otherwise concerning the report. The Investigator shall ensure that a record is made of all documentation collected and reviewed.
- b. The Investigator shall interview the Discloser (if the Discloser neither is anonymous nor has requested that his or her name not be disclosed by the Safe Disclosure Officer) and the Respondent. The Respondent and the Discloser may be accompanied by an advisor of their choosing. The name and position of an advisor shall be provided to the Investigator at least three (3) days prior to any meeting. If the advisor is legal counsel, five (5) days notice shall be provided.
- c. The Investigator may interview individuals suggested by the Discloser or Respondent or Responsible Officer who may shed light on the nature and substance of the report of an alleged Improper Act.
- d. The Investigator shall prepare a written report on the investigation, based on a. b. and c. above, within twenty (20) days the Responsible Officer having requested further investigati

- i. If any of the timelines defined above cannot be met, the Responsible Officer must be informed and approve a revised timeline.
- j. Records concerning reports and investigation of alleged Improper Acts shall be kept by the University Secretariat.

6. Protection from Reprisal

All reasonable steps consistent with the law and the rights of the Respondent shall be taken by the Safe Disclosure Officer, the Responsible Officer, the Investigator, or other officer or body charged with investigation of a good-faith report of an alleged Improper Act to protect the position, reputation, privacy and confidentiality of a Discloser who has made a report of an alleged Improper Act. Any breaches of confidentiality shall be reported to the Responsible Officer who will in turn inform the Discloser (if not anonymous) through the Safe Disclosure Officer if confidentiality can no longer be maintained.

No person shall take

alleged Improper Acts. At the end of each academic year, the Safe Disclosure Officer shall provide the Provost, the Senate and the Board of Trustees with an annual written report of:

- a. The number of reports made by Disclosers
- b. The number of reports investigated under this policy;
- c. The findings of investigations conducted pursuant to a report
- d. Any action taken pursuant to an investigation

This report shall respect the privacy of Disclosers and Respondents. The Report and all material collected during the investigation shall be held in the office of the Safe Discloser Officer and destroyed after a period of five years.

9. Related Policies

Employment Agreements

- [CUPE local 1302 collective agreement](#)
- [CUPE local 229 collective agreement](#)
- [CUPE local 254 collective agreement](#)
- [QUFA collective agreement](#)
- [QUSA Memorandum of Agreement](#) and [Memorandum of Understanding](#)

Related Senate and Board of Trustees Policies and Procedures (i.e. those that include report of wrongdoing, grievance or complaint procedures)

[Academic Integrity Procedures – Requirements of Faculties & Schools](#)

Computer User Code of Ethics
Human Subjects, Ethical Conduct for Research Involving
Integrity in Research