

POLICY 1.43 – Safe Disclosure

Policy Category:	General
Subject:	Safe disclosure of unethical behavior or improper financial activity
Sections:	Purpose ; Policy
Approving Authority:	Board of Governors
Responsible Officer:	Vice-President (Operations & Finance)
Responsible Office:	Internal Audit
Related Procedures:	Procedures for Reporting Concerns of Unethical Behaviour or Improper Financial Activity
Related University Policies:	MAPP Policy 1.35 – Non-Discrimination/Harassment/Sexual Misconduct Policy ; MAPP Policy 7.0 – Responsible Conduct of Research ; Scholastic Offences Policy ; MAPP Policy 3.4 – Conflicts of Interest
Effective Date:	November 20, 2025
Supersedes:	June 25, 2015; September 25, 2007

I. PURPOSE

Western University is committed to high standards of ethical behaviour by its members when they are carrying out their responsibilities. The University recognizes that its members, in carrying out their daily activities, are often in the best position to identify activities which could potentially cause harm to other members of the University, risk the reputation of the University, or harm it financially or in other ways.

The University depends on its members to report apparent breaches of ethical conduct in order that they may be investigated and corrective action taken. This policy provides a mechanism to disclose concerns without fear of retaliation and reflects the

University's commitment to accountability and ethical conduct. Anyone who has reasonable grounds to suspect unethical behavior or improper financial activity is expected to bring forward the allegation in a timely manner.

II. POLICY

- 1.00 The University is committed to providing an environment where members of the University community can disclose, in good faith, their concerns about unethical behaviour or improper financial activity that has occurred or could potentially occur, without being subject to reprisal of any kind. For the purposes of this policy, the University community includes but is not limited to employees, students, volunteers, contractors, suppliers, and other individuals who work, study or engage in activities at the University.
- 2.00 Individuals who have made allegations in good faith or provided information in good faith related to an allegation will not be subject to reprisal.
- 3.00 This policy is in addition to and does not replace the rights or responsibilities of an individual under law, employment contract or professional ethics.
- 4.00 Nothing in this policy shall limit or amend the provisions of other policies or the provisions of collective agreements entered into between the University and its employee groups and where such policies and agreements have application, those provisions shall prevail.
- 5.00 To allow a fair and impartial investigation to be completed, all individuals involved in a disclosure or an investigation shall not disclose or discuss the details and results of an investigation with anyone other than those personnel associated with the University who have a need to know such details and results in order to perform their duties and responsibilities. Details and results of investigations shall be confidential within the limitations of the law, collective or employee agreements and University policies.
- 6.00 Individuals who knowingly make false allegations or act in bad faith may be subject to the appropriate disciplinary action.
- 7.00 Any individual who experiences any type of retaliation as a result of reporting evidence of unethical behaviour or improper financial activity should immediately inform the person to whom the original report was made, who, in turn must contact the appropriate human resource officer.
- 8.00 The University has the following offices and processes to deal with various acts of misconduct:

- The Western Special Constable Service should be contacted where an individual has reason to believe that a possible criminal offence has occurred.
- Issues that involve discrimination and harassment should be referred to the Equity and Human Rights Office through [MAPP Policy 1.35 – Non-Discrimination/Harassment/Sexual Misconduct Policy](#) or through provisions in the relevant collective agreement.
- In cases of suspected academic dishonesty, matters should be reported in accordance with the appropriate policy such as MAPP Policy 7.0 – Responsible Conduct of Research or Senate’s Scholastic Offences Policy.
- In the case of an alleged faculty conflict of interest, the provisions in the Faculty Collective Agreement or the Conditions of Appointment for Physicians should be followed.
- Individuals with concerns about unethical behaviour that may be addressed through provisions of a collective agreement or other employment agreement governing their relationship with the University should follow the process identified by the relevant agreement.

In each of the above instances, investigation and reporting will occur in accordance with the relevant policy and/or agreement.

9.00 Internal Audit will be responsible for the investigation of matters related to allegations of improper financial activity.

10.00 For any concerns of unethical behavior not referred to in paragraph 8.00 or for concerns of improper financial activity, individuals should follow the Procedures established pursuant to this Policy.

Last Reviewed: