

WHISTLE BLOWER POLICY

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APPROVAL DATE	MAY 30, 2014
LAST AMENDMENT	FIRST VERSION
REVIEW DATE	MAY 2019
AUTHORITY	BOARD OF GOVERNORS
PRIMARY CONTACT	CHAIR OF AUDIT COMMITTEE

POLICY

Thompson Rivers University (TRU) encourages members of the TRU community, acting in good faith, to responsibly report to University authorities Improper Activity (defined below) on the part of the University or its employees without fear of retaliation.

The University is committed to protecting individuals from interference with making a Protected Disclosure (defined below) and from retaliation for having made a Protected Disclosure.

REGULATIONS

1. **Definitions.** For the purpose of this Policy:
 - a. “Improper Activity” means any activity that is undertaken by the University, an employee of the University, a student, a volunteer or a contractor, that:
 - i. is in violation of federal, provincial or municipal laws or regulations including corruption, malfeasance, bribery, theft of University property, fraud, coercion, misuse of University property, or willful omission to perform duty;
 - ii. is a serious violation of University policy; or
 - iii. involves gross misconduct, gross incompetence or gross inefficiency.
 - b. “Protected Disclosure” means a communication to a responsible University employee about actual or suspected Improper Activity based on a good faith and reasonable belief that the activity has both occurred and amounts to Improper Activity.

- c. "Retaliation" means adverse action by the University against an individual because she or he has made a Protected Disclosure.
2. **False or Reckless Allegations.** Any employee or volunteer who knowingly, or with reckless disregard for the truth, makes a false report (a "False Report") of Improper Activity is liable to disciplinary action, up to and including termination. Any student who makes a False Report is subject to discipline, up to and including suspension. Nothing in this policy prevents a member of the University community from bringing an action for defamation. Allegations that are not substantiated but which are made in good faith are not subject to discipline by the University.
3. **Retaliation.** No individual who makes a Protected Disclosure will suffer harassment, Retaliation or adverse employment consequences. Any person who imposes Retaliation against any individual who makes a Protected Disclosure is subject to discipline, up to and including termination. Individuals who report their own misconduct are not protected by this Policy.

Reporting and Action by the University. Members of the University community should make a Protected Disclosure to the Audit Committee using the following procedure.

A member of the University community who reasonably knows or has reason to believe that the University, or a member of the University community is engaged in Improper Activity should describe his or her concern in writing and should include sufficient information to allow the Audit Committee to understand and review the written concern. If the individual making the Protected Disclosure wishes to remain anonymous, the written communication should clearly indicate this wish for anonymity. All concerns should be forwarded to the Chair of the Audit Committee at the office of the Secretariat - University Governance, in a sealed envelope labeled as follows:

"To be opened by the Chair of the Audit Committee only."

Concerns can be sent via inter-campus mail to:

Chair of the Audit Committee

c/o Office of the Secretariat - University Governance, CT 300

Or via post to:

Chair of the Audit Committee

c/o Office of the Secretariat - University Governance, CT 300

Thompson Rivers University

900 McGill Road

Kamloops , BC, Canada V2C 0C8

If the individual making the Protected Disclosure wishes to discuss any matter with the Audit Committee, this request should be indicated in the submission. In order to facilitate such a discussion, the applicable individual may include a telephone number at which he

or she can be contacted. Any such envelopes received by the University will be forwarded promptly and unopened to the Chair of the Audit Committee.

4. Promptly following receipt of any Protected Disclosure submitted to it, the Audit Committee has the authority to do an investigation and or delegate to appropriate University department for investigation. The Audit Committee has the authority to retain at the University's expense, legal counsel, accounting and other advisors, consultants or experts it deems necessary in the performance of its duties. Outcomes Members of the University community found to have participated in Improper Activity may be subject to disciplinary action, which may include termination of employment and prosecution.
5. **Confidentiality.** Where appropriate, the University will use reasonable efforts in keeping Protected Disclosures confidential. However, individuals who make Protected Disclosures should be aware that confidentiality is not the same as anonymity, and that individuals who are accused of Improper Activity will, in most cases, be entitled to know the name of the person who has accused them.

The Audit Committee will retain as part of its records, all Protected Disclosures received for a period of no less than seven years. The Audit Committee will keep a written record of all such reports or inquiries and make quarterly reports on any ongoing investigation which will include steps taken to satisfactorily address each complaint.