



POLICY STATEMENT

Northlands College is committed to maintaining the highest standards of ethical conduct and integrity. This policy provides a framework and encourages all board members, employees, students, contractors, and volunteers, acting in good faith, to report suspected or actual wrongful conduct within the College, ensuring compliance with The Public Interest Disclosure Act, P-38.1 of Saskatchewan. It aims to promote accountability and protect individuals who make disclosures from reprisals.

PURPOSE

The purpose of this policy is to establish a clear and structured framework for individuals to report suspected or actual wrongful conduct within Northlands College. It is designed to promote ethical behavior and accountability within the College, ensuring compliance with applicable laws and regulations, including The Public Interest Disclosure Act. The policy encourages all members of Northlands College, including board members, full-time, part-time, permanent, temporary, and contract staff to report concerns in good faith and ensures protecting individuals who make disclosures from any form of reprisal and fostering an environment of transparency and integrity.

GUIDING PRINCIPLES

- Northlands College upholds the highest standards of ethical conduct and integrity. All stakeholders are encouraged to report suspected wrongdoings to ensure the College operates transparently and responsibly.
- The College guarantees protection from any adverse actions against individuals who, in good faith, report wrongdoing or assist in investigations.
- Disclosures will be handled in strict confidentiality, consistent with the need for a thorough investigation.
- The College is committed to conducting investigations fairly, impartially, and in a timely manner.

SCOPE

This policy applies to all members of Northlands College, including board members, full-time, part-time, permanent, temporary, and contract staff.

DEFINITIONS

- **Wrongdoing:** As defined under The Public Interest Disclosure Act, wrongdoing includes:
 - A contravention of a provincial/federal act or regulation.
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- An act or omission that creates a substantial and specific danger to the life, health, or safety of individuals or to the environment.
- Gross mismanagement of public funds or assets.
- Knowingly directing or counseling an individual to commit any of the above.
- **Protected disclosure:** Communication about actual or suspected wrongful conduct engaged in by a College board member, faculty, staff, student, contractor, or volunteer (who is not also the disclosing individual) based on a good faith and responsible belief that the conduct has both occurred and is wrongful under applicable law and/or College policy. College Employees are protected by the [Saskatchewan Whistle-blower Protection Act - Bill 609](#)
- **Reprisal:** Any adverse employment action taken against an employee because they have made a disclosure in good faith, sought advice about making a disclosure, cooperated in an investigation under the Act, or declined to participate in a wrongdoing.

REPORTING PROCEDURES

Employees who reasonably believe that a wrongdoing has occurred or is about to occur are encouraged to report their concerns. Employees are encouraged to first raise their concerns to their immediate supervisor; however, if the disclosure is about the supervisor, then disclosures can be made in two ways:

- **Internally:**
 - A disclosure of alleged wrongdoing can be made to the Director, Human Resources & Organizational Development.
 - If the disclosure is about the Director, Human Resources & Organizational Development, the disclosure may be made to the Vice President Finance and Administration.
 - If the disclosure is about the Vice President Finance and Administration or Academics, the disclosure may be made to President & CEO.
 - If the disclosure is about the President & CEO, the disclosure may be made to the Chair of Northlands College's Board of Governors.
- **Externally:** If the disclosure is about the Chair of Board of Governors or board members, the disclosure should be to the Public Interest Disclosure Commissioner's Office of Saskatchewan.

Contact information for the Public Interest Disclosure Commissioner's Office:

- Website: <https://ombudsman.sk.ca/pidc/>
- Phone: 1-800-667-978



REQUIRED DOCUMENTATION

All disclosures must be made in writing and should include the following information:

- A description of the alleged wrongdoing, including the date or dates of the alleged wrongdoing, if known, providing as much specific information as possible.
- Identification of everyone involved in the suspected wrongdoing.
- Information about any potential financial interests or rewards, if known.
- The known facts, circumstances, and/or actions observed by the discloser, including any information that may be of assistance in the investigation.

ETHICS COMMITTEE

Within Northlands College, an Ethics Committee will be responsible for reviewing and assessing disclosures. The committee will consist of three members from the following:

- President & CEO
- Vice President Finance and Administration
- Vice President Academics
- Union Representative

Three members are mandatory to form a quorum, depending on whom the disclosure has been reported against.

INVESTIGATION OF DISCLOSURES

All disclosures made will be reviewed and acknowledged promptly:

- Within five business days from the date on which a disclosure is received, receipt of the disclosure will be confirmed in writing.
- The Ethics committee, or designate, will then undertake an initial assessment of the alleged wrongdoing.
- Within 20 business days of receipt of the disclosure, the Ethics committee will notify the individual who made the disclosure as to the actions that will take place to investigate the allegations based on the evidence gathered in the initial assessment. Not all disclosures proceed to a formal investigation.
- Where a formal investigation is necessary, it will be completed within 45 business days from the date on which the disclosure was received.

Designated Officer

- The College Ethics committee will appoint a Designated Officer. Designated officer will be from Ministry of Advanced Education or Immigration and Career Training. The



- Designated Officer will ensure that disclosures are handled promptly, fairly, and in accordance with this policy and the Act.

Protection from Reprisal

Northlands College strictly prohibits any form of reprisal against employees who make disclosures in good faith. Any employee found to have engaged in reprisal actions will be subject to disciplinary measures, up to and including termination of employment.

Confidentiality

All disclosures will be treated confidentially to the extent possible, consistent with the need to conduct a thorough investigation and in accordance with legal requirements.

Investigation Process

Upon receiving a disclosure, the Members of Ethics Committee or Designate will:

- Acknowledge receipt of the disclosure to the reporting employee.
- Conduct a preliminary assessment to determine if the disclosure falls within the definition of wrongdoing under the Act.
- If warranted, initiate a formal investigation, which may involve gathering evidence, interviewing witnesses, and consulting with legal or other experts.
- Conclude the investigation with a written report outlining findings and any recommended corrective actions.

False or Misleading Disclosures

Any board member, employee, student, contractor, or volunteer who knowingly or with reckless disregard for the truth gives false information or knowingly makes a false report of wrongful conduct or a subsequent false report of retaliation will be subject to disciplinary action, up to and including termination. Allegations that are not substantiated yet are made in good faith are not subject to corrective action.

TRAINING AND AWARENESS

Northlands College will provide training and resources to ensure that all employees are aware of this policy, the procedures for making disclosures, and the protections available under the Act.

REVIEW OF POLICY

This policy will be reviewed periodically to ensure its effectiveness and compliance with applicable laws and regulations.



REFERENCES

- The Public Interest Disclosure Act, P-38.1:
<https://publications.saskatchewan.ca/#/products/32959>
- Public Interest Disclosure Commissioner's Office of Saskatchewan:
<https://ombudsman.sk.ca/pidc/>

FOR FORMS:

Whistleblower Report Form

Policy Originated: March 1, 2025	Approved by: Board of Governors
Last Approval Date: March 1, 2025	Approval Motion Number: 03-01-25-3011