



Memorandum

Secretariat

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TO: Board of Governors

FROM: Ms. Edyta Rogowska, Secretary-General

SUBJECT: Annual Report on the Policy on Safe Disclosure (“Whistle Blowing”)

DATE: May 10, 2023

DOCUMENT #: GD22-84

ACTION REQUIRED: INFORMATION APPROVAL/DECISION

ISSUE The annual report on the *Policy on Safe Disclosure (“Whistle Blowing”)* is presented to the Board for information. It provides an overview of activities undertaken in relation to, or under, the scope of the policy for the period January 1, 2022, through December 31, 2022.

BACKGROUND & RATIONALE This report is presented in accordance with section 8 of the *Policy on Safe Disclosure (“Whistle Blowing”)*, which states:

8.1 Once per academic year, the Secretary-General shall make a report to Senate and the Board of Governors, which report shall include:

- (i) the number of reports filed by Disclosers;
- (ii) the number of reports investigated;
- (iii) the number of findings of Improper Activity;
- (iv) the types of action taken pursuant to an investigation.

8.2 The annual report of Improper Activities shall respect the privacy of Disclosers and Respondents.

ALIGNMENT WITH MISSION AND STRATEGIC PRIORITIES McGill University recognizes that disclosure of wrongdoing is fundamental to ensuring the integrity of public administration and is a necessary and valuable service to its community.

COMPLIANCE WITH UNIVERSITY POLICY See “Background & Rationale”

COMPLIANCE WITH LEGISLATION / EXTERNAL REGULATIONS The *Act to facilitate the disclosure of wrongdoings relating to public bodies* requires public bodies to produce a report on activities undertaken pursuant to their disclosure of wrongdoing policies.

RISK FACTORS N/A

SUSTAINABILITY CONSIDERATIONS N/A

IMPACT OF DECISION AND NEXT STEPS The next annual report will be presented to Senate and the Board of Governors for information in Spring 2024. It will be based on the requirements of the new Policy on the Disclosure of Wrongdoing, which was approved by the Audit and

Risk Committee at its meeting on May 9, 2023 and by Senate at its meeting of May 10, 2023. The new Policy is being presented to the Board of Governors for final approval on the recommendation of the Audit and Risk Committee at its meeting of May 18, 2023 (see GD22-86).

**MOTION OR
RESOLUTION
FOR APPROVAL**

n/a - the annual report is presented for information.

APPENDICES

Appendix A: Annual Report on the *Policy on Safe Disclosure (“Whistle Blowing”)* 2022

Annual Report on the Policy on Safe Disclosure (“Whistle Blowing”)

Introduction

The *Policy on Safe Disclosure (“Whistle Blowing”)* was approved by Senate in May 2007 and by the Board of Governors in October 2007, and came into force on October 30, 2007. Following a review of the Policy, Senate approved revisions to the Policy on November 18, 2015. The revisions were then approved by the Board of Governors on November 26, 2015.

As stated in the Policy, those responsible for the administration and management of academic, administrative or service units are responsible for addressing situations of Improper Activity in accordance with good management practices and existing policies, guidelines and procedures. It is the expectation that members of the University community will continue to use existing channels to report Improper Activity and only resort to this Policy if such channels prove ineffective or are inappropriate in the circumstances. For more information about the Policy, please see: <https://www.mcgill.ca/secretariat/policies-and-regulations/safe-disclosure-whistle-blowing-reporting>

Section 8.1 of the Policy provides that the Secretary-General report annually to Senate and the Board of Governors on the application of the Policy. This report is presented to Senate and the Board of Governors in discharge of this obligation for the period January 1, 2022, through December 31, 2022.

The annual report shall respect the privacy of Disclosers and Respondents, as stipulated at various points in the Policy.

Report

During the reporting period from January 1, 2022, through December 31, 2022, one confidential disclosure was filed with the Secretary-General in accordance with the Policy. The report was reviewed by the relevant Responsible Officer, who determined that no further action was warranted.

The table below provides a summary of disclosures since November 2007 based on the requirements of the Policy.

Reporting Period	Number of reports filed by Disclosers	Number of reports investigated	Number of findings of Improper Activity	Types of action taken pursuant to an investigation
Jan. 1, 2022 – December 31, 2022	1	0	0	N/A
Jan. 1, 2021- December 31, 2021	1	1	1	Disciplinary action
Jan.1, 2020 – Dec. 31, 2020	1	1	0	N/A
Jan.1, 2019 – Dec. 31, 2019	1	1	1	Disciplinary action
Jan.1, 2018 – Dec. 31, 2018	5	0	N/A	N/A
Jan. 1, 2017 – Dec. 31, 2017	2	2	1	Disciplinary action and other administrative actions
Jan. 1, 2016 – Dec. 31, 2016	1	1	0	N/A
Nov. 1, 2014 – Dec. 31, 2015	4 (3 of which were later withdrawn)	1	0	N/A
Nov. 1, 2013 – Oct. 31, 2014	0	N/A	N/A	N/A
Nov. 1, 2012 – Oct. 31, 2013	1	0	0	N/A
Nov. 1, 2007 – Oct. 31, 2012	0	0	N/A	N/A