

Protected Disclosure (Whistleblower)

POLICY

Policy #:	PPL-POL-95		
Type:	☐ Academic	✓ Administrative	☐ Board
Effective date:	May 21, 2025		
Approved by:	Alim Remtulla, Vice President, People and Culture		College Council
Last revision:	November 2018		
Next scheduled review:	November 2026		

1. Purpose/Rationale

Georgian College is committed to transparent and accountable institutional operations. All members of the college community are expected to conduct themselves in a manner that is consistent with the College's stated values regarding ethical conduct and maintaining high standards of integrity and accountability in conducting college business.

This policy provides for the protected disclosure of wrongdoing (whistleblowing) to maintain and enhance public and college community confidence in Georgian College of Applied Arts and Technology (hereinafter also referred to as "Georgian" or "the College") and the integrity of its employees. This policy aligns with Georgian College's Board of Governors' policies and fulfills the requirements set out in the *Ontario Colleges of Applied Arts and Technology Act (2002) Regulation 34/03* and the *Minister's Binding Policy Directives*.

2. Scope

This policy applies to all members of the Georgian College community, including members of the Board of Governors, and all College activities and functions relating to the College, on or off campus premises.

This policy is not intended to replace other college policies and procedures put in place to address complaints of discrimination, workplace violence or harassment, individual complaints, academic appeals, accessibility, copyright, intellectual property, individual health and safety, management of employee performance, or provisions in any collective agreement. See Appendix A respecting areas of concern outside of this policy and its applicable policy and/or procedure.

3. Definitions

The table below lists the key terms and their meanings as they pertain to this policy document. Terms are listed in order of their first appearance.

Word/Term	Definition
Disclosure	The written communication of a concern, complaint or a report of any wrongdoing or suspected wrongdoing.
Good Faith	An honest and sincere belief or motive without any malice or the desire to deceive or mislead others.
Investigator	The individual to whom a disclosure is submitted. In most cases, the Investigator will be the Executive Director, Campus Safety Services.
Members of the College Community	Any person who studies, teaches, conducts research or works at or under the auspices of the college and includes, without limitation, any of the following: a. Any person who is an employee of the college b. Any person who is an appointee (including a volunteer, governor, member of an advisory committee, etc.) of the college c. Students, visiting executives and scholars, and any other person who is acting on behalf of, or at the request of, the college Any contractor, subcontractor, agent, vendor or company who is providing a product or service to the college; is receiving a service from the college; or is involved in a request for proposal / tender process issued by the college.
Procedural Fairness	The right of a person to be heard in a fair, unbiased and respectful manner prior to the making of a decision that may have a negative impact on their rights or interests.
Retaliation	Any harassment, intimidation, loss of business, discipline, demotion, or termination or threat to do so, with the intent to compel a college community member to abstain from disclosing wrongdoing or to retaliate against a college community member who has disclosed, or who is suspected of disclosing, a wrongdoing in good faith. In addition to the above, retaliation for employees could include, but would not be limited to, dismissal, layoff, suspension, demotion, transfer, discontinuation or elimination of a job, change in the location of a job, reduction in wages, change in hours of work, or reprimand or threatening to take any such action. Retaliation for students could include, but would not be limited to suspension, expulsion, assigning a failing grade, etc. or threatening to take any such action.
Whistleblower	A member of the college community making a disclosure of wrongdoing.
Whistleblower Disclosure	A whistleblower disclosure must include each of these elements:

Word/Term	Definition
	i. With adequate detail, specific incidents, acts or decisions thought to constitute a covert wrongdoing ii. The circumstances that surround the wrongdoing, including but not limited to the relevant times and places iii. The individuals involved in the wrongdoing, and iv. The rationale for invoking the Whistleblower Procedure, including an explanation as to why there is thought to be no other appropriate, confidential internal policy, procedure or mechanism available within the college under which the covert wrongdoing could be raised. If the disclosure does not include all four elements stated above, it is not deemed to be a whistleblower disclosure and it will be reviewed and considered under the other existing mechanisms.
Whistleblowing	The release or disclosure of information by a member of the college community that is evidence of improper activity or a violation of law as defined below. Whistleblowing is not an individual concern, appeal, complaint, grievance, or issue associated with matters such as but not limited to: academic appeals, student or employee conduct, harassment, discrimination, accessibility, copyright, intellectual property, individual health or safety, management or employee performance, provisions contained in collective agreements and/or legal statute.
Wrongdoing	For the purpose of this procedure, it is activity that constitutes: a. A criminal offence b. Negligent, improper or gross mismanagement of any College or public funds c. A serious, willful, and/or flagrant breach of federal, provincial, or municipal statute, College policy, procedure or regulation; and/or substantial and specific danger to the environment or public health and safety

4. Policy Statement

Georgian College is committed to fostering a college community that maintains internal and external confidence while fulfilling its vision, mission and legislated objectives and responsibilities. Ethical behaviour and acting with integrity build trust and inspires confidence in Georgian and helps to create successful partnerships within our college community, our broader external community, our local and regional employers, governments, other academic institutions, our donors and alumni and the public on the whole.

This policy is specific to the disclosure of wrongdoing, as outlined:

Included Under this Policy	Excluded Under this Policy
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• A criminal offence. • Negligent, improper or gross mismanagement of any College or public funds. • A serious, willful, and/or flagrant breach of federal, provincial or municipal statute, College policy, procedure or regulation; and/or substantial and specific danger to the environment or public health and safety.	• Individual concern, appeal, complaint, grievance • Academic appeals • Student or employee conduct • Harassment • Discrimination • Accessibility • Individual health or safety issues • Management or employee performance • Provisions contained in collective agreements and/or legal statute
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The excluded matters noted above are managed through other internal operational policies and procedures and/or other established avenues for resolution, Appendix A.

This policy supports members of the college community in reporting concerns that they do not feel comfortable in reporting to their direct supervisor or other primary contact connected to established policies and/or procedures.

4.1 Guiding Values and Principles

4.1.1 Every member of the Georgian College community is expected to conduct themselves with integrity and in an ethical manner that avoids real or perceived wrongdoing.

4.1.2 Every College community member has the right to come forward freely and without threat of reprisal where there is an honest belief that the College or its community members are engaged in criminal activity, negligent, improper or gross mismanagement of any College or public funds, and/or a serious, willful, and/or flagrant breach of federal, provincial, or municipal statute, College policy, procedure or regulation, and/or a substantial and specific danger to the environment, public health or safety.

4.1.3. The College takes all reports of wrongdoing seriously and will conduct an investigation that is appropriate to the circumstances.

4.1.4. All persons involved in allegations of wrongdoing have a right to procedural fairness and will be treated fairly and impartially regardless of their position within the College community or length of involvement with the College.

4.1.5 Reprisals and retaliation against any College community member(s) for applying this policy in good faith will not be tolerated.

4.1.5 The College will establish and make available procedures to ensure that reports of alleged breaches of this policy are dealt with in a fair and timely manner.

4.2 Accountability

4.2.1 Any member of the Georgian College community who knows of, has reason to believe, or has evidence that another college community member is engaged in serious wrongdoing may make a whistleblower complaint by following the established [Protected Disclosure \(Whistleblower\) Complaint Procedure](#).

4.2.2 Whistleblower complainants are to provide as much detail as possible including dates, individuals or witnesses involved, and any supporting material or evidence pertaining to the allegation.

4.2.3 While whistleblower complaints can be made anonymously, it is the accountability of the complainant to request their identity remain anonymous. All efforts will be made to ensure anonymity.

4.2.4 Whistleblower complaints will only be acted upon if the evidence collected in the preliminary investigation establishes that the report has merit, can be properly investigated, and should be pursued as a matter of the college's best interest.

5. Roles and Responsibilities

5.1 The Executive Director of Campus Safety Services is accountable for receiving, reviewing and determining the appropriate approach to follow to verify and investigate the matter, including the possible use of external legal counsel.

5.2 In the event a complaint is made respecting any member of the Campus Safety Services department, the Vice President of Finance and Corporate Services is responsible for receiving, reviewing and determining the appropriate approach to follow to verify and investigate the matter.

5.3 The Chair of the Board is responsible for reviewing whistleblower complaints related to Board matters, a Board member and/or the President.

5.4 The President is responsible for receiving whistleblower complaints about Vice Presidents, the Chairperson of the Board of Governors or in the event of a conflict of interest.

6. Related Procedure

[Protected Disclosure \(Whistleblower\) Complaint Procedure](#)

Contact	Email
<i>Leanne Jackson, Manager, Conflict Resolution & Investigations, Campus Safety Services</i>	Leanne.jackson@georgiancollege.ca

<i>Alim Remtulla, Vice President, People and Culture</i>	Alim.remtulla@georgiancollege.ca
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APPENDIX A

The following list includes areas of concern that are not covered by the *Protected Disclosure (“Whistleblower”) Policy* and their related policies and/or procedures. Please note, this list is not exhaustive.

Area of Concern	Applicable Policy and/or Procedure
Grades	<i>Academic Regulations, Student Code of Conduct</i>
Accessibility	<i>Accessibility Procedure</i>
Vexatious comments or conduct related to prohibited grounds (race, religion, colour, ancestry, place of origin, ethnicity, citizenship, sex, sexual orientation, age, marital or family status, disability and receipt of public assistance)	<i>Accommodation for Disabilities Policy Accommodation for Family Status Policy Accommodation for Religious Observance Policy Employee Code of Conduct Freedom of Expression Policy Human Rights and Anti-Discrimination policy Anti-Hate Policy Student Code of Conduct</i>
Unwanted sexual acts	<i>Sexual Violence Procedure</i>
Health and Safety	<i>Illness, Injury and Hazard Reporting Procedure</i>
Uttering threats, acts of violence or attempted violence, charges of sexual harassment, charges of discrimination, behaviours considered a crime under the <i>Canadian Criminal Code</i>	<i>Violence Prevention and Protection Policy</i>
Behaviour interfering with activities of the College and/or the learning environment	<i>Student Code of Conduct Employee Code of Conduct</i>
Plagiarism, Cheating	<i>Academic Integrity Policy Academic Regulations</i>