Disclosure of Wrongdoing Policy

Policy Number: G-02.05.00	Next Review Date: 2027
Approved by: NSRDDA Board	Approval Date: February 8, 2026

1. Purpose

The purpose of this policy is to promote a culture of integrity, accountability and ethical conduct by providing a clear and safe process for reporting suspected wrongdoing within the organization. It enables individuals to raise serious concerns in good faith, ensures those concerns are addressed fairly and appropriately, and reinforces the organization's commitment to acting responsibly in the public interest.

2. Scope

This policy applies to:

- All Board and Committee members
- All employees and contractors
- All registrants (in relation to their interactions with the Regulator)

This policy addresses internal disclosures of wrongdoing related to the operation of the Regulator. It is not intended to replace other reporting mechanisms such as:

- Complaints about registrant conduct (which are dealt with under the regulatory complaints process)
- Human resources grievances or complaints
- Occupational health and safety concerns

3. Definition of Wrongdoing

Wrongdoing, for the purpose of this policy, includes but is not limited to:

- A contravention of federal or provincial laws or regulations
- Gross mismanagement, including misuse of funds or assets
- Serious breach of the Regulator's Code of Conduct, Conflict of Interest and other governing policies
- Knowingly directing or counselling a person to commit wrongdoing
- A substantial and specific danger to life, health, safety, or the environment
- Reprisal against an individual making a disclosure or participating in an investigation under this policy

4. Guiding Principles

- **Good Faith Reporting**: Disclosures must be made honestly and with a sincere belief that the information provided is true or that wrongdoing may have occurred. Individuals who make disclosures in good faith are protected under this policy, even if the concerns are ultimately unsubstantiated. However, knowingly making a false or malicious allegation is a serious matter and may result in appropriate follow-up or disciplinary action.
- **Confidentiality**: The identity of individuals making disclosures, and the information disclosed will be protected to the extent possible, subject to the need to investigate and take corrective action.
- **No reprisal**: No one shall suffer reprisal for making a disclosure in good faith or participating in an investigation under this policy.
- **Fairness**: Individuals alleged to have committed wrongdoing will be treated fairly and provided with an opportunity to respond to allegations.
- **Equity and Inclusion**: Disclosures will be received and considered in a manner that is respectful, inclusive, and free from bias, recognizing the diverse identities and lived experiences of those involved.

5. Making a Disclosure

Disclosures should be made in writing and submitted to:

Primary Contact

- Registrar (registrar@nsrdda.ca)
- If the concern involves the Registrar or if the individual is uncomfortable reporting to the Registrar, the disclosure may be submitted to:

Alternate Contact

- Chair of the Board or Chair of the Finance, Audit and Risk (FAR) Committee

Anonymous disclosures will be accepted but may limit the ability to investigate effectively.

A disclosure should include:

a. The nature of the wrongdoing
b. The name(s) of person(s) involved (if known)
c. Dates, locations, and other relevant details
d. Any supporting evidence available

6. Investigation Process

a. The Registrar (or Board Chair or FAR Committee Chair, as applicable) will review the disclosure and determine whether it meets the definition of wrongdoing under this policy.

b. If accepted, an investigation will be initiated, which may be conducted internally or by an external party, depending on the nature of the allegation.
c. The individual making the disclosure will be informed of the outcome of the initial review and whether an investigation will proceed.
d. All parties involved will be expected to cooperate with the investigation.
e. Where appropriate, the investigation process will incorporate culturally responsive and accessible practices to ensure fairness for all parties.
f. Upon conclusion, the investigator will prepare a report outlining findings, and if appliable, recommendations for corrective action.

7. Outcomes and Corrective Action

If an investigation confirms that wrongdoing has occurred, the organization will take appropriate corrective and/or disciplinary action, which may include:

- Remedial training or coaching
- Revision of internal procedures or controls
- Formal reprimand or warning
- Suspension or termination of employment, contract, or appointment
- Referral to law enforcement authorities, if warranted
- Restitution or recovery of misused funds or assets
- Notification to affected parties, where appropriate

Where the investigation finds no wrongdoing, the matter will be closed, and efforts may be made to restore trust or working relationships if needed.

8. Protection from Reprisal

Individuals who, in good faith, disclose wrongdoing or participate in an investigation under this policy shall not be subject to retaliation or reprisal. Any act of reprisal will be treated as a serious violation and may result in disciplinary action.

The NSRDDA recognizes that individuals from equity-deserving or marginalized communities face additional barriers or risks when reporting concerns. Any retaliation or reprisal, including those based on identity, background, or lived experience, will not be tolerated.

9. Record Keeping and Reporting

All disclosures and related investigation records will be maintained in a secure and confidential manner. A summary of disclosures and outcomes (without identifying information) may be reported to the Board annually to support oversight and continuous improvement.

There may be instances where disclosure to the Board occurs at an earlier stage when/if the issue is deemed to be valid for investigation, or if the Board Chair, FAR Committee Chair, or Registrar prefers consultation with the Board. As with all Board matters, these communications would be strictly confidential.

10.Monitoring and Policy Review

The Chair of the FAR Committee and the Registrar will ensure that this policy is reviewed in accordance with the Board's policy review cycle or as required by significant operational or environmental changes.

11. Accountability

The Board Chair and the Registrar are accountable for ensuring compliance with this policy.