


Administrative Procedure Reporting Wrongdoing	
	Department: Corporate Services
	Approved by: Leadership Council
	Date Approved: April 20, 2026
	Revision Date(s):
	Review Date:
	<p>External References</p> <ul style="list-style-type: none"> • The Public Interest Disclosure Act (PIDA) and Regulations • The Freedom of Information and Protection of Privacy Act (FOIP) and Regulations • The Archives and Public Records Management Act • Government of Saskatchewan PIDA's web page • PID Commissioner's website • PIDA Designated Officer's Toolkit <p>Internal References</p> <ul style="list-style-type: none"> • Disclosure of Wrongdoing form • Complaint of Reprisal form

Purpose

- [The Public Interest Disclosure Act \(PIDA\)](#) protects employees who make a disclosure of wrongdoing in good faith, which occurred in their workplace and relates to the public interest. This administrative procedure outlines the process by which Saskatchewan Distance Learning Centre (Sask DLC) employees may disclose wrongdoing in good faith and sets out the protections, roles, responsibilities and procedures required under PIDA. As a Treasury Board Crown corporation, Sask DLC is a prescribed government institution under PIDA.
- This administrative procedure is not intended to address routine operational or human resource (HR) matters. This procedure does not replace existing HR, grievance or occupational health and safety processes.

Scope

- This administrative procedure **applies** to all Sask DLC employees and former employees, with respect to reprisal complaints.
- This procedure **does not apply to** persons who are not employees of Sask DLC at the time of making a disclosure and contractors, vendors or members of the public. These individuals may use other available channels.

Policy Statement

Sask DLC is committed to a culture of integrity, accountability and trust. In accordance with PIDA, Sask DLC will:

- Provide employees with a safe, confidential process to disclose wrongdoing in good faith;
- Protect employees from reprisal for making a disclosure, seeking advice, cooperating in an investigation, or declining to participate in wrongdoing;
- Investigate all valid disclosures fairly, impartially and in accordance with the principles of procedural fairness

and natural justice;

- Take appropriate corrective action where wrongdoing is found; and
- Maintain strict confidentiality of all information related to disclosures, including the identity of the disclosing employee, witnesses and any person alleged to have committed a wrongdoing.

An employee who commits a wrongdoing may be disciplined up to and including dismissal, in addition to and separate from any penalty provided for by law.

Procedures

1. What is a wrongdoing under PIDA?

- a) A wrongdoing under PIDA means any of the following:
 - i. A contravention of any federal or provincial Act or regulation;
 - ii. An act or omission that creates a substantial and specific danger to the life, health, or safety of persons, or to the environment — not including dangers inherent to the employee’s normal job duties;
 - iii. Gross mismanagement of public funds or a public asset; or
 - iv. Knowingly directing or counselling a person to commit any of the above.
- b) PIDA does not cover routine operational matters, interpersonal conflicts or personal disagreements with management decisions. Employees who are unsure whether their concern qualifies as a wrongdoing under PIDA may seek confidential advice from Sask DLC Designated Officer (the Designated Officer) or the Public Interest Disclosure Commissioner (the Commissioner) before filing a disclosure.

2. Seeking advice

- a) No formal disclosure is required to seek advice from the Designated Officer or the Commissioner.
- b) Seeking advice is a protected activity under PIDA - no reprisal may be taken against an employee for seeking advice, even if they ultimately choose not to make a formal disclosure. Employees may contact either of the following:

	The Designated Officer	The Commissioner
Name	Sara Hawryluk	Public Interest Disclosure Commissioner
Title	Executive Director, Finance, Human Resources and Planning, Sask DLC (Regina Corporate Office)	Office of the Saskatchewan Ombudsman
Email	pida@saskdlc.ca	commissioner@ombudsman.sk.ca
Telephone	n/a	1-800-667-9787
Website	n/a	www.ombudsman.sk.ca
Confidentiality	Yes — all contacts are confidential	Yes — all contacts are confidential

- c) The Designated Officer or Commissioner may require a request for advice to be made in writing. All advice requests will be logged for record-keeping purposes and treated as strictly confidential.

3. How to make a disclosure

- a) An employee who reasonably believes that a wrongdoing has been committed, is about to be committed, or has been asked to commit a wrongdoing, may make a disclosure to:
 - i. the Designated Officer; or
 - ii. the Commissioner (at any time, including if unsatisfied with handling at Sask DLC level).
- b) A valid disclosure must:
 - i. be made in good faith;
 - ii. be in writing on prescribed [Disclosure of Wrongdoing form](#);
 - iii. contain a description of the wrongdoing, the name(s) of the alleged wrongdoer (if known), and the date(s) (if known); and
 - iv. be made **within two years** of the alleged wrongdoing.
- c) If a disclosure involves personal or confidential information, the disclosing employee must take all reasonable precautions to ensure no more information is disclosed than is necessary to make the disclosure.
- d) Employees who make public disclosures, anonymous disclosures, or disclosures that do not meet the requirements of PIDA will not be protected under PIDA.
- e) An employee must submit completed [Disclosure of Wrongdoing form](#) to the Designated Officer in person, by mail (marked "Personal and Confidential") or by secure email (pida@saskdlc.ca).
- f) Once a disclosure is filed with the Designated Officer, it cannot be withdrawn. The Commissioner may consider a withdrawal under certain circumstances at the Commissioner's discretion.
- g) There are a few situations in which an employee may not make a disclosure under PIDA because another law or regulation prohibits disclosure of the information. For example, an employee is not authorized to disclose:
 - i. information described in Subsection 16(1) of *The Freedom of Information and Protection of Privacy Act* (Cabinet documents, except with consent of Cabinet or where the records are greater than 25 years old).
 - ii. information that is protected by solicitor-client privilege (i.e., all communications, verbal or written, of a confidential character between a lawyer and a client related to seeking, formulating or giving legal advice or assistance).

4. Receiving and reviewing disclosures

- a) Upon receipt of a disclosure, in accordance with PIDA and [PIDA Designated Officer's Toolkit](#) the Designated Officer will:
 - i. receive and log — date-stamp the disclosure, open a secure separate file, and log it in the confidential PIDA tracking record;
 - ii. discuss with the disclosing employee — **within 20 days**, arrange to privately discuss the disclosure, confirm communication preferences and advise of confidentiality protections and obligations. An employee may bring a support person (e.g., a union representative for in-scope employees) when

meeting with the Designated Officer. The support person is present to provide support only and may not speak on behalf of the employee;

- iii. review — **within 40 days**, assess whether the matter is within Sask DLC's jurisdiction, falls within PIDA's wrongdoing categories, was made in good faith, is within the **two-year time limit**, and whether a conflict of interest exists;
 - iv. notify — advise the CEO (unless the CEO is the subject) and advise the disclosing employee of next steps. If the criteria in iii. above are not met, the Designated Officer will close the file and notify both the disclosing employee and the CEO. The Designated Officer must nonetheless determine whether any other action may be warranted under another Act, regulation or administrative procedure;
 - v. investigate or act — if criteria are met, conduct an investigation or take immediate corrective action if warranted. Investigations must be completed within a reasonable amount of time;
 - vi. report and close — **within 30 days of completing investigation**, deliver a written report with findings and recommendations to the CEO and advise the disclosing employee of the outcome.
- b) If a conflict of interest exists (e.g. the disclosure involves the Designated Officer or the CEO), the matter must be referred to the Commissioner for review and handling.

5. Protection from reprisal

- a) No person at Sask DLC shall take or direct a reprisal against an employee or former employee because the employee, in good faith:
 - i. sought advice about making a disclosure;
 - ii. made a disclosure under PIDA;
 - iii. cooperated in an investigation under PIDA; or
 - iv. declined to participate in suspected wrongdoing.
- b) Protection from reprisal applies even if no wrongdoing is ultimately found.
- c) An employee (or former employee) may make a complaint of reprisal directly to the Commissioner. When filing a complaint of reprisal, the employee must demonstrate that they have a reasonable belief that a reprisal has been committed or is about to be committed. A complaint of reprisal must:
 - i. be made in good faith;
 - ii. be in writing on prescribed [Complaint of Reprisal form](#);
 - iii. contain a description of the reprisal, the name(s) of the person(s) alleged to have committed or be about to commit the reprisal (if known), and the date of the reprisal (if known); and
 - iv. be made **within two years** of the alleged reprisal.
- d) Only the Commissioner can process complaints of reprisal. Each case will be managed individually.

6. Confidentiality

- a) All persons involved in the disclosure process must protect the identity of the disclosing employee, witnesses, and the alleged wrongdoer to the fullest extent possible.

- b) All disclosure files must be kept in separate, secure files protected from unauthorized access. Electronic records must be stored in a secure system accessible only to authorized individuals.
- c) Disclosure records are subject to FOIP.

7. Offences under PIDA

- a) The following are offences under PIDA and apply to all persons - including employees, managers, the Designated Officer and the CEO. Each offence is punishable by a fine of up to \$10,000.
 - i. It is an offence to knowingly make a false or misleading statement, orally or in writing to the Designated Officer, CEO or the Commissioner, or to a person acting on their behalf or under their direction, in seeking advice about making a disclosure, in making a disclosure, or during an investigation.
 - ii. It is an offence to willfully obstruct the Designated Officer, CEO or the Commissioner, or a person acting on their behalf or under their direction, in the performance of a duty under PIDA.
 - iii. It is an offence to destroy, mutilate, alter, or falsify a document, make a false document, or conceal a document or thing — or to direct, counsel, or cause such destruction, falsification, or concealment — knowing that the document or thing is likely to be relevant to an investigation under PIDA.
- b) Taking or directing a reprisal against an employee who has, in good faith, sought advice, made a disclosure, cooperated in an investigation, or declined to participate in wrongdoing is also an offence under PIDA, punishable by a fine of up to \$10,000.

8. Records management

- a) The Designated Officer must maintain a mechanism to track all disclosures for annual reporting purposes. All records related to disclosures, advice requests, and investigations must be:
 - i. maintained in separate, secure, and confidential files;
 - ii. protected from unauthorized access;
 - iii. subject to records retention requirements under *The Archives and Public Records Management Act*; and
 - iv. retained in accordance with Sask DLC's records management procedures.

Roles and Responsibilities

Leadership Council is responsible for

- Approving this administrative procedure and any amendments; and
- Providing organizational oversight to ensure Sask DLC meets its obligations under PIDA.

CEO is responsible for

- Establishing and maintaining this procedure;
- Appointing a Designated Officer for Sask DLC;
- Receiving notifications from the Designated Officer regarding disclosures received;

- Taking appropriate corrective action following an investigation finding; and
- Ensuring the enforcement and follow-up of any disciplinary or corrective action taken pursuant to PIDA.

Sask DLC Designated Officer is responsible for

- Receiving, reviewing, and managing disclosures of wrongdoing made by Sask DLC employees;
- Providing confidential advice to employees considering making a disclosure;
- Conducting or overseeing investigations in accordance with this procedure;
- Referring disclosures to another designated officer or to the Commissioner where appropriate;
- Maintaining secure, confidential disclosure files and a tracking log;
- Preparing and submitting investigation reports to the CEO within 30 days of completion;
- Contributing to annual reporting requirements under PIDA; and
- Acting in good faith, with objectivity and impartiality, in all matters under this procedure.

All Sask DLC employees are responsible for

- Disclosing concerns in good faith using the prescribed form;
- Maintaining confidentiality about the disclosure and all persons involved;
- Cooperating with the Designated Officer or Commissioner during any investigation;
- Refraining from taking or directing any reprisal; and
- Refraining from making false or misleading statements — an offence under PIDA, punishable by a fine.

Definitions

Disclosure: A written report made in good faith by an employee who reasonably believes information could show that a wrongdoing has been committed, is about to be committed, or that an employee has been asked to commit a wrongdoing.

Public Interest Disclosure Commissioner: An independent officer of the Saskatchewan Legislature.

Reprisal: Any measure that adversely affects the public service employee's working conditions (e.g., a dismissal, layoff, suspension, demotion or transfer, discontinuation or elimination of a job, change of job location, reduction in wages, change in hours of work or reprimand), as well as a threat to take any of the measures mentioned above.

Wrongdoing: Under PIDA, a wrongdoing is a contravention of federal or provincial law; an act or omission that creates substantial and specific danger to life, health, safety or the environment; gross mismanagement of public funds or assets; and knowingly directing someone to commit any of these.