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| CANADIAN BLIND SPORTS ASSOCIATIONWHISTLEBLOWER POLICY |
| ***This Policy has been prepared by the Organization and is a Pan-Canadian Policy applicable to the Organization and its Participating Members. This document cannot be modified by a Participating Member without consultation and approval from the Organization.*** |

1. **Definitions**
2. The following additional terms have these meanings in this Policy:
3. *“Director”* – An individual appointed or elected to the Board
4. *“Worker”* – An individual who has signed an Employment Agreement or Contractor Agreement with the Organization or a Participating Member
5. **Purpose**
6. The purpose of this Policy is to allow Workers to have a discrete and safe procedure by which they can disclose incidents of wrongdoing without fear of unfair treatment or reprisal.
7. **Application**
8. This Policy only applies to Workers who become aware of incidents of potential wrongdoing committed by Directors or by other Workers.
9. Incidents of potential wrongdoing or misconduct observed or experienced by participants, volunteers, spectators, parents of participants, or other individuals not employed or contracted by the Organization or a Participating Member can be reported under the terms of the *Discipline and Complaints Policy* and/or reported to the organization’s Board of Directors or senior staff person to be handled under the terms of the individual Worker’s Employment Agreement or Contractor Agreement, as applicable, and/or the organization’s *Human Resources Policy*.
10. Matters reported under the terms of this Policy may be referred to be heard under the *Discipline and Complaints Policy* at the discretion of the Compliance Officer.
11. **Wrongdoing**
12. Wrongdoing can be defined as:
13. Violating the law;
14. Intentionally or seriously breaching of the *Code of Conduct and Ethics*;
15. Intentionally or seriously breaching the organization’s policies for workplace violence and harassment;
16. Committing or ignoring risks to the life, health, or safety of a participant, volunteer, Worker, or other individual;
17. Directing an individual or Worker to commit a crime, serious breach of a policy, or other wrongful act; or
18. Fraud.
19. **Pledge**
20. The Organization and its Participating Members pledge not to dismiss, penalize, discipline, or retaliate or discriminate against any Worker who discloses information or submits, in good faith, a report against a Worker under the terms of this Policy.
21. Any individual affiliated with the Organization or a Participating Member who breaks this Pledge will be subject to disciplinary action up to and including termination.
22. **Reporting Wrongdoing**
23. A Worker who believes that a Participant has committed an incident of wrongdoing should prepare a report that includes the following:
24. Written description of the act or actions that comprise the alleged wrongdoing, including the date and time of the action(s);
25. Identities and roles of other people or Participants (if any) who may be aware of, affected by, or complicit in, the wrongdoing;
26. Why the act or action should be considered wrongdoing; and
27. How the wrongdoing affects the person submitting the report (if applicable).
28. **Authority**
29. The following Compliance Officer has been appointed to receive reports made under this Policy: Brian Ward, CBSA Safe Sport Ombuds at safesport\_wwdrs@primus.ca.
30. After receiving the report, the Compliance Officer has the responsibility to:
31. Assure the person reporting of the **Pledge**
32. Connect the Worker reporting to the Alternate Liaison if the individual feels that he or she cannot act in an unbiased or discrete manner due to the individual’s role and/or the content of the report
33. Determine if the report is frivolous, vexatious, or not submitted in good faith (e.g., the submission of the report is motivated by personal interests and/or the content of the report is obviously false or malicious)
34. Determine if the *Whistleblower Policy* applies or if the matter should be handled under the *Discipline and Complaints Policy* or other applicable policy
35. Determine if the local police service be contacted
36. Determine if mediation or alternate dispute resolution can be used to resolve the issue
37. Determine if the senior staff person and/or Board of Directors of the Organization or the Participating Member, if applicable, should or can be notified of the report
38. Begin an investigation
39. **Investigation**
40. If the Compliance Officer determines that an investigation should be launched, the Compliance Officer may decide to contract an external investigator. In such cases, the organization’s senior staff person and/or Board of Directors may be notified that an investigation conducted by an external investigator is necessary without the nature of the investigation, content of the report, or identity of person reporting who submitted the report being disclosed. The senior staff person and/or Board of Directors may not unreasonably refuse the decision to contract an external investigator
41. An investigation launched by the Compliance Officer or by an external investigator should generally take the following form:
42. Follow-up interview with the Worker who submitted the report
43. Identification of Workers, participants, volunteers or other people that may have been affected by the wrongdoing
44. Interviews with such-affected individuals
45. Interview with the Director(s) or Worker(s) against whom the report was submitted
46. Interview with the supervisor(s) of the Worker(s) against whom the report was submitted, if applicable
47. Request of all relevant documents which could include but not limited to copies of emails, text messages, contracts, relevant policies
48. In all stages of the investigation, the investigator will take every precaution to protect the identity of the Worker who submitted the report and/or the specific nature of the report itself. However, the Organization and its Participating Members recognize that there are some instances where the nature of the report and/or the identity of the Worker who submitted the report will or may be inadvertently deduced by individuals participating in the investigation.
49. The investigator will prepare an Investigator’s Report – omitting names whenever possible and striving to ensure confidentiality – that will be submitted to the organization’s senior staff person and/or Board of Directors for review and action.
50. **Decision**
51. Within fourteen (14) days after receiving the Investigator’s Report, the senior staff person and/or Board of Directors will take corrective action, as required. Corrective action may include, but is not limited to including:
52. Enacting and/or enforcing policies and procedures aimed at eliminating the wrongdoing or further opportunities for wrongdoing;
53. Revision of job descriptions; or
54. Implementation of the appropriate policy to determine the appropriate remedy.
55. The corrective action, if any, will be communicated to the investigator who will then inform the person who submitted the report.
56. Decisions made under the terms of this Policy may be appealed under the terms of the *Appeal Policy* provided that:
57. If the person who submitted the initial report is appealing the decision, the person who reported understands that his or her identity must be revealed if he or she submits an appeal, and
58. If the Individual against whom the initial report was submitted is appealing the decision, the person who submitted the report understands that the identity of the person who submitted the report will not be revealed and that the Organization or the Participating Member will act as the Respondent.
59. **Confidentiality**
60. Confidentiality at all stages of the procedures outlined in this Policy. An individual who intentionally breaches the confidentiality clause of this Policy will be subject to disciplinary action.

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| **Policy History** |
| Approved | **2021 01 21** |
| Next Review Date |  |
| Revision Approval Dates |  |