

 <b>POLICY MANUAL</b>	<b>Subject:</b>		<b>Whistleblower</b>
	<b>Number:</b>		<b>OVCA- <span style="border: 1px solid blue; padding: 2px;">Number</span></b>
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VERSION CONTROL		
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### **PREAMBLE**

The Ottawa Valley Curling Association ( the “OVCA”)is committed to the highest standards of ethical conduct and integrity. We believe in fostering a culture of transparency and accountability where all stakeholders; including employees, volunteers, and participants can voice concerns about unethical or illegal practices without fear of retaliation.

This Whistleblower policy is designed to support individuals in reporting any incidents of wrongdoing, ensuring that they can do so in a confidential and secure manner. It is our priority to address such reports promptly and fairly, upholding the values of respect and fairness for all involved.

By implementing this policy, the OVCA reaffirms its dedication to maintaining a safe, just and ethical working environment.

### **PURPOSE**

The purpose of this Policy is to allow individuals to have a discreet and safe procedure by which they can disclose incidents of wrongdoing without fear of unfair treatment or reprisal.

### **DEFINITIONS**

The following terms have these meanings in this Policy:

- a. *Director*- An individual appointed or elected to the OVCA’s Board of Directors
- b. *Worker*- An individual who has signed an Employment Agreement or Contractor Agreement with OVCA
- c. *OVCA* - The Ottawa Valley Curling Association
- d. *Days* - calendar days, including weekends and holidays

### **POLICY**

#### **Application**

1. This policy only applies to individuals and organizations (“persons”) that observe or experience incidents of wrongdoing committed by directors or by other individuals.
2. Incidents of wrongdoing or misconduct observed or experienced by participants, volunteers, spectators, parents of participants, or other individuals not employed or contracted by the OVCA can be reported under the terms of the OVCA’s *Discipline and Complaints Policy* and/or reported to the OVCA’s Board to be handled under the terms of the individual Worker’s Employment Agreement or Contractor Agreement, as applicable, and/or any other relevant and applicable OVCA policy.

3. Matters reported under the terms of this Policy may be referred to be heard under the OVCA's *Discipline and Complaints Policy*, at the discretion of the Compliance Officer.

### Wrongdoing

4. Wrongdoing can be defined as:
  - a. Violating the law;
  - b. Intentionally or seriously breaching the OVCA's *Code of Conduct and Ethics*;
  - c. Intentionally or seriously breaching the OVCA's policies for workplace violence and harassment;
  - d. Committing or ignoring risks to the life, health, or safety of a participant, volunteer, worker, or other individuals;
  - e. Directing an individual or worker to commit a crime, serious breach of a policy of the OVCA or other wrongful act; or
  - f. Fraud.

### Pledge

5. The OVCA pledges not to dismiss, penalize, discipline, retaliate or discriminate against any persons who discloses information or submits, in good faith, a report against any persons under the terms of this Policy.
6. Any individual affiliated with the OVCA who breaks this pledge will be subject to disciplinary action.

### Reporting Wrongdoing

7. Any persons who believe that a Director or another worker has committed an incident of wrongdoing should prepare a report that includes the following:
  - a. Written description of the act or actions that compromise the alleged wrongdoing, including the date and time of the act or action;
  - b. Identities and roles of other individuals (if any) who may be aware of, affected by, or complicit in, the wrongdoing;
  - c. Why the act or actions should be considered to be wrongdoing.

### Authority

8. The OVCA will appoint a Compliance Officer under this policy and will make their name and contact information available on our website and/or other publicly available means.
9. After receiving the report, the Compliance Officer has the responsibility to:
  - a. Assure the person of the OVCA's Pledge;
  - b. Connect the person to the Alternate Liaison if the individual feels that he/she cannot act in an unbiased or discreet manner due to the individual's role with the OVCA and/or the content of the report;

- c. Determine if the report is frivolous, 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);
- d. Determine if the OVCA's *Whistleblower Policy* applies or if the matter should be handled under the OVCA's *Discipline and Complaints Policy*;
- e. Determine if local police should be contacted;
- f. Determine if mediation or alternate dispute resolution can be used to resolve the issue;
- g. Determine if the OVCA's Chairperson should or can be notified of the report;
- h. Begin an investigation;
- i. Determine whether to consult, without revealing the identity of the person making the report, with the Chair about the responsibilities listed in this section.

### Alternate Liaison

10. If the person feels that the Compliance Officer is unable to act in an unbiased or discreet manner due to the individual's role with the OVCA and/or the content of the report, the person should contact the following individual who will act as an independent liaison between the person and the Compliance Officer:
  - The OVCA will identify an alternate contact for whistleblowers and make their name and contact information available on our website and/or other publicly available means.
11. The Alternate Liaison will not disclose the person's identity to the Compliance Officer or anyone affiliated with the OVCA without the person's consent.
12. A person who is unsure if he or she should submit a report, or who does not want to have his or her identity known, may contact the Alternate Liaison for informal advice about the process.

### Investigation

13. 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 OVCA's Chairperson may be notified that an investigation conducted by an external investigation is necessary without the nature of the investigation, content of the report, or identity of the person who submitted the report being disclosed.
14. An investigation launched by the Compliance Officer or by an external investigator should generally take the following form:
  - a. Followup interview with the person who submitted the report;
  - b. Identification of participants, volunteers or others that may have been affected by the wrongdoing;
  - c. Interviews with such-affected individuals
  - d. Interview with the person(s) about whom the report was submitted

15. In all stages of the investigation, the investigator will take every precaution to protect the identity of the person who submitted the report and/or the specific nature of the report itself. However, the OVCA recognizes that there are some instances where the nature of the report and/or the identity of the person who submitted the report will or may be inadvertently deduced by individuals participating in the investigation.
16. The investigator will prepare an Investigator's Report- omitting names whenever possible and striving to ensure confidentiality- that will be submitted to the OVCA's chairperson for review and action.

### Decision

17. Within fourteen (14) days after receiving the Investigator's Report, the OVCA's Chairperson will take corrective action, as required. Corrective action may include, but is not limited to including:
  - a. Enacting and/or enforcing policies and procedures aimed at eliminating the wrongdoing or further opportunities for wrong doing;
  - b. Discipline, suspension, termination, or other action(s) as permitted by the OVCA's Bylaws, any relevant and applicable OVCA policy.
18. The corrective action, if any, will be communicated to the investigator who will then inform the person who submitted the report.
19. Decisions made under the terms of this Policy may be appealed under the terms of the OVCA's *Appeal Policy* provided that:
  - a. If the person who submitted the initial report is appealing the decision, the person understands that his/her identity must be revealed if he/she submits an appeal.
  - b. If the director or person against whom the initial report was submitted is appealing the decision, the director or person understands that the identity of the person who submitted the report will not be revealed and the OVCA will act as the respondent.

### Confidentiality

20. Confidentiality at all stages of the procedures outlined in this Policy- from the initial report to the final decision- is assured for all individuals (the person, the person(s) against whom the report is submitted, and the individuals interviewed during the investigation). An individual who intentionally breaches the confidentiality clause of this Policy will be subject to disciplinary action.