



## BOWLS CANADA BOULINGRIN Whistleblower Policy

### Purpose

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

### Application

2. This Policy applies to individuals and organizations that observe or experience incidents of wrongdoing and report such incident or observations under the expectation of privacy.
3. Matters reported under the terms of this Policy may be referred to be heard under BCB's *Discipline and Complaints Policy*, at the discretion of the Compliance Officer.
4. Matters reported under the terms of this Policy may be referred directly to law enforcement agencies.

### Wrongdoing

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

### Pledge

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

### Reporting Wrongdoing

8. A person who believes an incident of wrongdoing has occurred should prepare a report that includes the following:
  - a) Written description of the act or actions that comprise the alleged wrongdoing, including the date and time of the action(s);
  - b) Identities and roles of other individuals or Workers (if any) who may be aware of, affected by, or complicit in, the wrongdoing;
  - c) Why the act or action should be considered to be wrongdoing.

### Authority

9. BCB has appointed the following Compliance Officer to receive reports made under this Policy:

**Anna Mees, Executive Director**  
**Bowls Canada Boulingrin**  
**amees@bowlscanada.com**

10. After receiving the report, the Compliance Officer has the responsibility to:
- a) Assure the person of BCB's **Pledge**
  - b) Connect the person to the Alternate Liaison if the individual feels that he or she cannot act in an unbiased or discreet manner due to the individual's role with BCB and/or the content of the report
  - c) 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)
  - d) Determine if BCB's *Whistleblower Policy* applies or if the matter should be handled under BCB's *Discipline and Complaints Policy*
  - e) Determine if the local police service be contacted
  - f) Determine if mediation or alternate dispute resolution can be used to resolve the issue
  - g) Determine if BCB's Chairperson and/or Executive Director should or can be notified of the report
  - h) Begin an investigation

### **Alternate Liaison**

11. If the person feels that the Compliance Officer is unable to act in an unbiased or discrete manner due to the individual's role with BCB 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:

Independent Safe Sport Officer  
Brian Ward  
W&W Dispute Resolution Services  
[safesport\\_wwdrs@primus.ca](mailto:safesport_wwdrs@primus.ca)

12. The Alternate Liaison will not disclose the person's identity to the Compliance Officer or to anyone affiliated with BCB without the person's consent.
13. 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**

14. If the Compliance Officer, or Alternate Liaison, determines that an investigation should be launched, the Compliance Officer, or Alternate Liaison, may decide to contract an external investigator. In such cases, BCB's Executive Director and/or President 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 the person who submitted the report being disclosed. BCB's Executive Director and/or President may not unreasonably refuse the decision to contract an external investigator.
15. An investigation launched by the Compliance Officer, or Alternate Liaison, should generally take the following form:
- a) Follow up interview with the person who submitted the report
  - b) Identification of Workers, participants, volunteers or other individuals that may have been affected by the wrongdoing
  - c) Interviews with such-affected individuals
  - d) Interview with the Director(s) or person(s) against whom the report was submitted
  - e) Interview with the supervisor(s) of the Director(s) or person(s) against whom the report was submitted
16. 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, BCB 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.

17. The investigator will prepare an Investigator's Report that will be submitted to the Compliance Officer, the Independent Safe Sport Officer, BCB's President and/or Executive Director for review and action.

**Decision**

18. Within fourteen (14) days after receiving the Investigator's Report, BCB's President and/or Executive Director 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 wrongdoing;
  - b) Revision of job descriptions; or
  - c) Discipline, suspension, termination, or other action as permitted by BCB's Bylaws, provincial employment legislation, BCB's *Human Resource Policy Manual*, and/or the person's Employment Agreement or Contractor Agreement.
19. Communication will be provided to the person who submitted the report at the conclusion of the matter.

**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, but the principals of procedural fairness must be considered and notice of such matter to BCB.

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Approved: October 2019