



## BOWLS CANADA BOULINGRIN Whistleblower Policy

### Definitions

1. Terms in this Policy are defined as follows:
  - a) Director – a member of the Board of Directors of Bowls Canada Boulingrin (“BCB”)
  - b) Worker – an individual who performs work for BCB including employees, managers, supervisors, temporary workers, volunteers, student volunteers, part-time workers, and independent contractors.

### Purpose

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

### Application

3. This Policy only applies to Workers that observe or experience incidents of wrongdoing and report such incident or observations under the expectation of privacy.
4. Incidents of wrongdoing or misconduct observed or experienced by participants, volunteers, spectators, parents of participants, or other individuals not employed or contracted by BCB can be reported under the terms of the *Discipline and Complaints Policy* and/or reported to the applicable 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 applicable organization’s policies for human resources.
5. Any violation of this Policy that may be considered “Prohibited Behaviour” or “Maltreatment” (as defined in the UCCMS) when the Respondent is an Organizational Participant who has been designated by BCB as a UCCMS Participant (as defined in the *Discipline and Complaints Policy*), will be handled pursuant to the policies and procedures of the Office of the Sport Integrity Commissioner (“OSIC”), subject to the rights of BCB as set out in the *Discipline and Complaints Policy* and any applicable workplace policies.
6. Matters reported under the terms of this Policy may be referred directly to law enforcement agencies.

### Wrongdoing

7. 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 Worker to commit a crime, serious breach of a BCB policy, or other wrongful act; or
- f) Fraud.

### **Pledge**

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

### **Reporting Wrongdoing**

- 10. A Worker 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.
  - d) How the wrongdoing affects the Worker submitting the report (if applicable).

### **Authority**

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

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

- 12. After receiving the report, the Compliance Officer has the responsibility to:
  - a) Assure the Worker of BCB's **Pledge**
  - b) Connect the Worker to the Alternate Liaison if the individual feels that they 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) and, if so, inform the Worker that no action will be taken on the report and the reasons why the report has been considered frivolous, vexatious, or not in good faith
- 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 Chief Executive Officer should or can be notified of the report
- h) Begin an investigation

### **Alternate Liaison**

13. If the Worker 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 Worker should contact the following individual who will act as an independent liaison between the person and the Compliance Officer:

Independent Safe Sport Officer  
Sport Dispute Management  
[jferdinand@sportdispute.com](mailto:jferdinand@sportdispute.com)

14. The Alternate Liaison will not disclose the Worker's identity to the Compliance Officer or to anyone affiliated with BCB without the person's consent.
15. A Worker who is unsure if they should submit a report, or who does not want to have their identity known, may contact the Alternate Liaison for informal advice about the process.

### **Investigation**

16. 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 Worker who submitted the report being disclosed. BCB's Executive Director and/or President may not unreasonably refuse the decision to contract an external investigator.
17. An investigation launched by the Compliance Officer, or Alternate Liaison, should generally take the following form:
- a) Follow up interview with the Worker 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 Worker(s) against whom the report was submitted
  - e) Interview with the supervisor(s) of the Director(s) or Worker(s) against whom the report was submitted
18. 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, BCB recognizes 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.
19. 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**

20. 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.
21. The corrective action, if any, will be communicated to the investigator who will then inform the Worker who submitted the report.
22. Decisions made under the terms of this Policy may be appealed under the terms of the *Appeal Policy* provided that:
- a) If the Worker who submitted the initial report is appealing the decision, the Worker understands that their identity must be revealed if they submit an appeal, and
  - b) If the Director or Worker against whom the initial report was submitted is appealing the decision, the Worker or Director understands that the identity of the Worker who submitted the report will not be revealed and that the applicable organization will act as the Respondent.

23. Communication will be provided to the person who submitted the report at the conclusion of the matter.

### **Confidentiality**

24. 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 Worker, the Worker(s), or Director(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.

25. 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, BCB recognizes 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.

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Approved: June 2023