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| **CATEGORY: 1.0 GOVERNANCE & STRATEGIC DIRECTION POLICIES**  **SECTION: 1.9 General Policies** | | | |
| **POLICY: 1.9.10 Whistleblowing Policy** | **APPROVED:**  **Jan 2018** | **REVISED:**  **July ‘ 19** | **PAGES: 5** |

**Definition:**

1. A whistleblower is a person who exposes any kind of information or activity that is deemed illegal, [unethical](https://en.wikipedia.org/wiki/Ethics), or immoral within an [organization](https://en.wikipedia.org/wiki/Organization) that is either private or public.

**Preamble:**

1. The Canadian Paralympic Committee (CPC) is committed to providing a safe welcoming and inclusive environment which is athlete-centred, where all Individuals are treated with respect which is characterized by the values of fairness, integrity, and open communication and without discrimination.

**Purpose and Application:**

1. The purpose of the Whistleblowing Policy is to encourage and enable CPC staff, volunteers, sport members and members of the public to report any illegal, [unethical](https://en.wikipedia.org/wiki/Ethics), or immoral activity concerning financial or operational matters, pertaining to the CPC, without fear of reprisal.
2. Individuals have a duty to report any activity which:
3. they believe contravenes the law;
4. represents a real or perceived conflict of interest, or a breach of a CPC Policy;
5. represents a misuse of the CPC’s funds or assets; or
6. represents a danger to public health, safety, and/ or the environment.
7. This policy provides direction regarding the process for reporting questionable activity and the resolution of such reports

### Rationale

1. The CPC is committed to maintaining a high standard of public trust and confidence with its stakeholders. As a result, the CPC requires the observation of high standards of fiduciary business and personal ethics in the conduct of the duties and responsibilities of all CPC participants.
2. All CPC participants have an obligation to report questionable activity regarding financial or operational matters, including violations of federal or provincial law, and violations of the CPC’s policies and/or the CPC Bylaws.

### Applicability

1. The Whistleblowing Policy applies to all CPC participants at all times, during the course of their work in sport and also during other activities where their conduct may affect the work and sport environment, whether that be at the CPC offices, at meetings of the CPC, at Games or at any other location, whether in Canada or abroad.
2. CPC participants include all persons engaged in any paid or volunteer capacity with the CPC or otherwise under the jurisdiction of the CPC. Without limiting the reach of this policy, CPC participants include:
3. CPC directors, officers, members and volunteers;
4. CPC employees and persons under contract with the CPC;
5. All athletes eligible for nomination to, or forming part of, any team participating in sport competitions over which CPC has jurisdiction; and
6. All persons working with those teams or athletes, including coaches, medical and paramedical personnel, sports federation representatives, and other support persons.

### Policy Statements

Whistleblowers

1. Concerns should be reported using the CPC’s prescribed procedures for filing reports, through written reports and in other forms that are permitted. CPC may also initiate a written report on behalf of an anonymous Whistleblower when warranted.
2. It is the policy of the CPC:
3. to treat all reported incidents in a confidential manner and with due care to the extent possible, consistent with the need to conduct an adequate investigation. A Whistleblower may provide a report anonymously. The CPC will make its best efforts to protect the identity of a Whistleblower; and
4. that all parties to an investigation will be treated fairly.

Reprisals

1. It is the policy of the CPC that any person who reports a concern in good faith will not be subject to reprisal or other adverse consequences as a result of submitting a report.
2. Any CPC participant who retaliates against someone who has reported a concern in good faith will be subject to sanctions. Any participant who is found to be in violation of this policy (e.g. harassment of the Whistleblower) shall be addressed with under *CPC Discipline Policy*.
3. Any CPC participant who has reasonable grounds to believe that a reprisal has been taken against him or her may file a complaint under the CPC’s *Workplace Violence and Harassment Policy* and the complaint will be investigated as if the alleged reprisal was a breach of that policy.
4. None of the protections afforded to a Whistleblower under this policy shall apply to protect a person who intentionally makes false accusations. The CPC may sanction a participant in such circumstances.

### Procedure

1. A concern can be reported in confidence using the CPC’s Whistleblower Form and submitting it to the Chief Executive Officer or in the event that the Chief Executive officer (CEO) is in conflict to the Chair of the Human Resources and Operations Committee. The CEO or Chair of the Human Resources and Operations Committee will share the form with the utmost confidence to any individual identify as supporting the process.
2. A concern pertaining to the CPC *Workplace Violence and Harassment Policy* will be dealt with in accordance with that Policy. All other matters will be reviewed and, if warranted, the CEO or in case that the CEO is in conflict the Human Resources and Operations Committee Chair will initiate an investigation, and at the conclusion of that process will make appropriate recommendations to the CPC Board of Directors. The CEO and/or the Committee Chair has the authority to retain outside counsel, accountants, investigators and other resources deemed necessary to conduct a full and complete investigation of the concern.
3. The Committee Chair may also refer a matter to a more appropriate authority (i.e. WADA, RCMP, NSO).
4. If wrongdoing is found, appropriate remedial actions will be taken and/or sanctions imposed.
5. Except when a report is anonymous, the Whistleblower will be advised once the review and/or investigation of a matter has been completed, and if warranted may be provided information about the outcome.
6. In any year in which a concern has been reported, the CEO and Human Resource and Operations Committee Chair will summarize the reported concerns and activities under this policy, and the Human Resource and Operations Committee will receive a report from the CPC resource person of any reports, complaints or appeals under the CPC *Workplace Violence and Harassment Policy*. In addition, a quarterly summary report will be provided by to the CPC Board of Directors in camera.
7. The CEO, Committee Chair and the CPC resource person shall forward to the CPC CEO, the (sealed) documentation resulting from every report received under this policy unless the CEO is in conflict.
8. Questions relating to this Whistleblowing Policy should be directed to either the CEO or the Chair of the Human Resource and Operations Committee at the email addresses listed on the form.

# In- Confidence

# CPC Whistleblower Form

Whistleblower Form submitted to:

CEO

Karen O’Neill

or

Chair, Human Resources and Operations Committee

Rem Langan

The Canadian Paralympic Committee will treat all disclosures in a confidential, sensitive and timely manner. The process has been designed so as to protect your identity when communicating your concern. This Whistleblower Form allows you the opportunity to provide your name and contact information in confidence as this information may assist us in investigating your concern. Should you not wish to provide your name, reported incidents will still be accepted and investigated if sufficient documentation and evidence is provided to substantiate the claim.

## Instructions

Please provide as much detail as possible.

1. Please describe the nature of your concern. Include sufficient information for an independent person to understand the concern and to enable further investigation.
2. Please provide details with respect to the location and/or date of the incident (e.g. region, event, specific location, department, etc.) and how you became aware of it.
3. Please state the full name, title and role of each individual whom you suspect of wrongdoing.
4. How many times has this incident taken place (if applicable)?
5. How long has this incident been taking place (if applicable)?
6. Would you be willing to provide your name and contact information? (Please note that this is optional however, as stated in the CPC Whistleblower policy, your identity will be kept confidential to the extent possible and treated with due care, consistent with the need to conduct an adequate investigation.)

No. We may not be able to follow up with you.

Yes. If yes, please provide your name, email, and telephone number for follow up purposes.

Please return your completed form, in confidence to:

**Chair, CPC Human Resources and Operations Committee**

Rem Langan

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