

## NIAGARA-ON-THE-LAKE SAILING CLUB Whistleblower Policy

Effective date	March 6, 2023
Initial Approved Date	March 6, 2023
Date last reviewed	March 6, 2023
Archived date	March 8, 2023
Replaces and/or amends	NA
Appendix(-ces) to this Policy	<b>NA</b>

*Note: The Safe Sport Policy Suite Definitions apply to this policy, please refer to that document for term definitions. Our Safe Sport policies follow the legal practice of capitalized defined terms to assist the reader in identifying that the term has a specific meaning within the policy suite.*

### **Purpose**

The intention of this policy is to support a culture where every Individual feels empowered and supported in playing an active role in proactively working towards a safe sport culture in sailing in Canada. This policy supplements, and does not replace, any procedures required by law, regulation, or funding source requirements. NIAGARA-ON-THE-LAKE SAILING CLUB is committed to ensuring our established and implemented policies and procedures enable Individuals to come forward with information on illegal practices or violations of organizational policies.

### **Scope**

This policy applies to all Individuals and participants of Sail Canada, Ontario Sailing and NIAGARA-ON-THE-LAKE SAILING CLUB and complaints raised concerning policies, code of conducts, programs, services, or organization procedures of NIAGARA-ON-THE-LAKE SAILING CLUB

### **Policy**

In keeping with NIAGARA-ON-THE-LAKE SAILING CLUB goal of maintaining the highest standards of conduct and ethics, we will investigate complaints of suspected fraudulent or dishonest use or misuse of our resources or property by staff, Board members, consultants, volunteers, or registered participants. To maintain the highest standards of service, NIAGARA-ON-THE-LAKE SAILING CLUB will also investigate complaints concerning its programs and services. Additionally, NIAGARA-ON-THE-LAKE SAILING CLUB will not Retaliate against an employee who, in good faith, raised a complaint against some practice of the organization, or of another individual or entity with whom NIAGARA-ON-THE-LAKE SAILING CLUB has or had a business relationship, based on a reasonable belief that the practice is in violation of law or a clear mandate of policy.

### **Protection**

No director, officer, employee, volunteer, or member/participant who in good faith Reports suspected fraudulent or dishonest use or misuse of its resources or property or complaints concerning NIAGARA-ON-THE-LAKE SAILING CLUB's programs and services shall suffer Maltreatment, Harassment, Retaliation, or adverse employment or other consequences. An Individual who Retaliates against someone who has reported a violation in good faith is subject to the process in the Discipline and Complaints Policy. For

employees discipline up to and including termination of employment is possible. This policy is intended to encourage and enable staff, Board members, consultants, volunteers, or registered participants to raise serious concerns within the organization prior to seeking resolution outside the organization. The Policy is in addition to any non-Retaliation requirements contained in our human resource policies and those required by law.

Staff, Board members, volunteers, and all our stakeholders are encouraged to Report suspected fraudulent or dishonest conduct or problems with services provided, following the procedures set forth in the NIAGARA-ON-THE-LAKE SAILING CLUB Safe Sport Policies. This includes, but is not limited to, concerns that may fall under the mandate of the Office of the Sport Integrity Commissioner.

### **Reporting**

A person's concerns that fall outside NIAGARA-ON-THE-LAKE SAILING CLUB's Safe Sport Policies, and the role of the Independent Third Party, about possible fraudulent or dishonest use or misuse of resources or property, or program operation, should be reported to the President or if it involves the President, the Ontario Sailing. If, for any reason, a person finds it difficult to report his or her concerns to this individual, they may report the concerns directly to any member of the Board of Directors. Alternatively, to facilitate reporting of suspected violations where the reporter wishes to remain anonymous, a written statement may be submitted to one of the Directors on the Board.

### **Investigation**

All relevant matters, including suspected but unproved matters, will be promptly reviewed and analyzed, with documentation of the receipt, retention, investigation, and treatment of the complaint. Appropriate corrective action will be taken, if necessary, and findings may be communicated to the reporting person and their supervisor, if appropriate. Investigations may be conducted by the President, the Board, Ontario Sailing or independent persons such as auditors and/or attorneys. Investigators will endeavor to maintain and protect confidentiality, to the best of their ability as the situation allows.

This protection from Retaliation is not intended to prohibit supervisors from taking action, including disciplinary action, in the usual scope of their duties and based on valid performance-related factors. Individuals making complaints must be made in good faith; employees who intentionally make false allegations are subject to disciplinary action in accordance with the organization's human resource policies.

### **Enforcement**

Any alleged violations of this Whistleblower Policy shall be addressed pursuant to NIAGARA-ON-THE-LAKE SAILING CLUB's Discipline and Complaints Policy.

### **Privacy**

The collection, use and disclosure of any personal information pursuant to this Policy is subject to NIAGARA-ON-THE-LAKE SAILING CLUB's Privacy Policy.