

WHISTLEBLOWER POLICY

Definitions

1. Terms in this Policy are defined as follows:
 - a) **Director** - A person appointed or elected to Ringette Canada's Board of Directors.
 - b) **Worker** - Any person who performs work for Ringette Canada including employees, managers, supervisors, temporary workers, volunteers, student volunteers, part-time workers, Director, and independent contractors.

Purpose

2. Ringette Canada is committed to fostering an environment conducive to open communication regarding the operations of Ringette Canada and to protecting Workers from unlawful retaliation and discrimination for their having properly disclosed or reported illegal or unethical conduct.
3. To further this commitment, this Policy:
 - a) Establishes guidance for the receipt, retention and treatment of verbal or written reports received by Ringette Canada from a Worker regarding actions that (i) are illegal, unethical or contrary to Ringette Canada's policies in respect of accounting, internal controls, disclosure, or business practices or (ii) constitute discrimination, harassment, violence or abuse against a Worker by another Worker;
 - b) Provides Workers the ability to file a report in a confidential and anonymous manner; and
 - c) Demonstrates Ringette Canada's intention to discipline any person who commits an act of retaliation or reprisal against a Worker up to and including termination of employment for just cause, in the case of employees, contract termination for an independent contractor, or removal of Director in accordance with the By-Laws.

Application

4. This Policy only applies to Workers who observe or experience incidents of wrongdoing committed by other Workers.

Wrongdoing

5. Wrongdoing includes, but is not limited to:
 - a) Violating the law;
 - b) Intentionally breaching of the *Code of Conduct and Ethics*;
 - c) Committing or ignoring risks to the life, health, or safety of a participant, Worker, or other individuals;
 - d) Directing an individual or Worker to commit a crime, serious breach of a policy, or other wrongful act; or
 - e) Fraud.

Pledge

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

Reporting Wrongdoing

8. A Worker who believes that 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 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; and
 - d) How the wrongdoing affects the Worker submitting the report (if applicable).
9. Incidents of wrongdoing or misconduct by a Worker observed or experienced by Participants, volunteers, spectators, parents of participants, or other individuals who are not Workers, and not employed or contracted by Ringette Canada can be reported under the terms of the Discipline and Complaints Policy and/or reported to Ringette Canada's Board of Directors or Executive Director to be handled under the terms of the individual Worker's Employment Agreement or Contractor Agreement, as applicable, and/or Ringette Canada's policies relating to human resources.
10. Matters reported under the terms of this Policy may be referred to be heard under the Discipline and Complaints Policy, at the discretion of the Compliance Officer.

Authority

11. The following Compliance Officer has been appointed to receive reports made under this Policy:

Ringette Canada Executive Director

whistleblower@ringette.ca

613-748-5655 ext 222

12. After receiving the report, the Compliance Officer has the responsibility to:
 - a) Assure the Worker of the **Pledge**
 - b) Connect the Worker to the Alternate Liaison if the Worker feels that they cannot act in an unbiased or discrete manner due to the individual's role with Ringette Canada 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 the *Whistleblower Policy* applies or if the matter should be handled under the *Discipline and Complaints Policy*
 - e) Determine if the local police service should be contacted
 - f) Determine if mediation or alternative dispute resolution can be used to resolve the issue
 - g) Determine if Ringette Canada's President and/or Executive Director 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 Ringette Canada and/or the content of the report, the Worker should contact the following individual who will act as an independent liaison between the Worker and the Compliance Officer:

Ringette Canada Independent Third Party
safesport_wwdrs@primus.ca

14. The Alternate Liaison will not disclose the Worker's identity to the Compliance Officer or to anyone affiliated with Ringette Canada without the Worker'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, Ringette Canada's President and/or Executive Director must 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. Ringette Canada's President and/or Executive Director may not unreasonably refuse the decision to contract an external investigator.

17. An investigation launched by the Compliance Officer or Alternate Liaison by an external investigator should generally take the following form:
 - a) Follow-up interview with the Worker who submitted the report
 - b) Identification of Workers, participants, or other individuals that may have been affected by the wrongdoing
 - c) Interviews with such-affected individuals
 - d) Interview with the Worker(s) against whom the Report was submitted
 - e) Interview with the supervisor(s) of the Worker(s) against whom the report was submitted, if applicable

18. The investigator will prepare an Investigator's Report – omitting names whenever possible and striving to ensure confidentiality – that will be submitted to Ringette Canada's President and/or Executive Director for review and action. The Investigator's Report will be shared with the parties upon the discretion of Ringette Canada.

Decision

19. Within fourteen (14) days after receiving the Investigator's Report, Ringette Canada'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 the By-laws, provincial/territorial employment legislation, applicable policies for human resources, and/or the Worker's Employment Agreement or Contractor Agreement.

20. The corrective action, if any, will be communicated to the investigator who will then inform the Worker who submitted the report.

21. 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, and
 - b) If the Worker against whom the initial report was submitted is appealing the decision, the Worker understands that the identity of the Worker who submitted the report will not be revealed and that Ringette Canada will act as the Respondent.

Confidentiality

22. Confidentiality at all stages of the procedures outlined in this Policy – from the initial report to the final decision – is the goal for all individuals (the Worker(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.

23. 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, Ringette Canada 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.

This Policy is subject to review at least once every year

Date of last review: February 15, 2023

The publication of Ringette Canada policies will be in the English and French languages. In the case of conflicting interpretations, the English version will prevail.