



Policy Title	Whistleblower Policy (Safe Disclosure)
Responsible Subcommittee	Governance and Risk Management
Date of Approval	February 9, 2023
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This Policy has been prepared by Water Polo Canada and is applicable to Water Polo Canada, its members, affiliated organizations, and registrants. This document cannot be modified without consultation with and approval by Water Polo Canada.

Policy Statement

Water Polo Canada (“WPC”) requires employees, members, officers, and directors to observe high standards of personal and business ethics in the conduct of their activities, duties and responsibilities involving WPC.

In addition, WPC strives to maintain financial records and prepare financial statements and reports which comply with all applicable accounting principles and laws.

As members, employees and representatives of WPC, we must demonstrate honesty and integrity in fulfilling our responsibilities and conducting our behaviour. We must comply with all applicable laws and regulations at all times. Any activity that is unlawful, unethical, harassing and/or discriminatory defined as Maltreatment or Prohibited Behavior is prohibited.

Definitions

“**Activity**” means all WPC or PSO business and/or activities;

“**Board**” means the Board of Directors for Water Polo Canada;

“**Date of Approval**” means as stated on Page 1 of the Policy; “

including” means including but not limited to;

“**Individuals**” – refers to all categories of members and/or registrants defined in the Bylaws of Water Polo Canada and in the Bylaws of a Provincial/Territorial Association, as applicable, as well as all people employed by, contracted by, or engaged in activities with or on behalf of, Water Polo Canada or a Provincial/Territorial Association including, but not limited to, employees, contractors, athletes, clubs, coaches, mission staff, referees, volunteers, managers, administrators, committee members, parents or guardians, spectators, and directors and officers.

“**Maltreatment**” – means psychological, physical and sexual maltreatment as defined in the UCCMS.

“**Member**” refers to a Provincial or Territorial Sport Organization that is responsible for the management of water polo within its provincial or territorial boundaries (also referred to as PSO);

“**Officers**” means the officers of WPC as indicated in the bylaws

“**OSIC**” – means the Office of the Sport Integrity Commissioner, an independent division of the SDRCC which comprises the functions of the Sport Integrity Commissioner;

“**Policy**” means this Whistleblower Policy.

“Responsible Subcommittee” means as stated on Page 1 of the Policy; “WPC” means Water Polo Canada

“**Prohibited Behavior**” – means a prohibited behavior as defined in the UCCMS.

“**Provincial/Territorial Associations**” – the provincial/territorial member governing bodies for water polo in each province/territory

“**UCCMS**” - means the Universal Code of Conduct to Prevent and Address Maltreatment in Sport, as amended from time to time by the SDRCC.

“**UCCMS Complaint**” means a complaint related to a breach of the UCCMS involving a UCCMS Participant;

“**UCCMS Participant**” - means a Registrant affiliated with WPC who has been a) designated by WPC and b) who has signed the required consent form. UCCMS Participants may include an Athlete, an official, an Athlete Support Personnel, an employee, a contractual worker, an administrator, or a volunteer acting on behalf of, or representing the NSO in any capacity.

“**WPC Compliance Officer**” means the Executive Director of Water Polo Canada

Application

The goal of this Whistleblower Policy (the “Policy”) is to discourage illegal, unethical, harassing and/or discriminatory or Prohibited Behavior activity and business conduct (“questionable behaviour”) that damages WPC’s reputation, business interests and its relationship with members and stakeholders and the community at large. This Policy provides an avenue for members, employees, officers, and directors to raise concerns regarding questionable behaviour, and it provides reassurance that they will be protected from reprisals or victimization for whistleblowing in good faith.

Reporting Responsibility

It is the responsibility of all employees, members, officers, and directors of WPC to report any violations or suspected violations of any WPC Policy or Code of Conduct and Ethics, any questionable behaviour and any concerns regarding accounting, financial statement disclosure, internal accounting, disclosure controls or auditing matters (a “Complaint”) in accordance with this Policy.

Executives, officers, and directors of WPC are required to report all Complaints to WPC’s Compliance Officer, who has the specific and exclusive responsibility to investigate all Complaints. A sample Complaint Form is attached hereto as Exhibit A, which is recommended for use by the person receiving the Complaint.

UCCMS Complaints involving UCCMS Participants shall be exclusively reported to and administered by OSIC.

No Retaliation

No employee, member, officer, or director of WPC who in good faith makes a Complaint or a UCCMS Complaint shall suffer harassment, retaliation or adverse consequences to employment, membership or otherwise. An employee, officer or director that retaliates against someone who has made a Complaint or UCCMS Complaint in good faith is subject to discipline up to and including termination of membership, employment, or other relationship with WPC, and he/she may be faced with other disciplinary actions pursuant to the terms of WPC’s policies.

Reporting Violations

With the exception of UCCMS Complaints who shall be reported to OSIC, this Policy is intended to encourage and enable employees, members, officers and directors to raise serious concerns within WPC, rather than seeking resolution outside WPC. WPC has an open-door policy, and it encourages its members, employees, officers and/or directors to speak with someone in WPC’s management whom they are comfortable approaching and who can address their questions, concerns, suggestions and complaints properly.

Compliance Officer

WPC's Compliance Officer is responsible for investigating all reported Complaints with exception of UCCMS Complaints who shall be administered and investigated by OSIC. The Compliance Officer is the Executive Director of WPC and may be contacted by telephone at +1 (613) 748-5682 x 322 or by email at mgoulet@waterpolo.ca. If you are not comfortable speaking with the Compliance Officer or, if the Compliance Officer is unavailable and the matter is urgent, you may contact Lise Maclean, Independent Third Party via email lise@wiserworkplaces.ca.

Acting in Good Faith

Anyone filing a Complaint or UCCMS Complaint must be acting in good faith and have reasonable grounds for reporting the questionable behaviour. Any allegations found to be unsubstantiated and which prove to have been made maliciously or with the knowledge that they were false will be viewed as a serious disciplinary offence. This Policy encourages employees, members, directors, and officers to identify themselves when making any allegations, since the appropriate follow-up questions and investigation may not be possible unless the source of the information is identified. Reported violations or suspected violations expressed anonymously will be investigated, but consideration will be given to the following factors: fairness to any individual named in the Complaint, the seriousness of the issue raised, the credibility of the information or allegations in the Complaint and the prospects of an effective investigation and discovery of evidence.

Confidentiality

OSIC rules and procedures, particularly concerning confidentiality, shall apply to UCCMS Complaints.

Other than UCCMS Complaints, WPC will treat all Complaints as confidential and privileged to the fullest extent as reasonably possible and as permitted by law. WPC will exercise particular care to keep confidential the identity of any person making a Complaint under this procedure until a formal investigation is launched. Thereafter, the identity of the person making the Complaint may be kept confidential, if requested, unless such confidentiality is incompatible with a fair investigation, unless there is an overriding reason for identifying or otherwise disclosing the identity of the person or unless such disclosure is required by law. In this instance, the person making the Complaint will be so informed in advance of him or her being identified with the Complaint. Where disciplinary proceedings are invoked against any individual following a Complaint, WPC will typically require the name of the person making the Complaint to be disclosed to the person subject to such proceedings.

Though WPC encourages individuals to put their name to any Complaint they make, anonymous Complaints will also be accepted. In responding to an anonymous Complaint, WPC will pay due regard to fairness towards any individual named in the Complaint, the seriousness of the issue raised, the credibility of the information or allegations in the Complaint and the prospects of an effective investigation and discovery of evidence. Investigations will be conducted, taking into account the nature and complexity of the Complaint and the issues raised therein.

Handling of Complaints

As soon as reasonably practicable, the Compliance Officer will notify the sender and

acknowledge receipt of a Complaint, provided that it has not been filed anonymously. All reports will be promptly investigated, and the appropriate corrective action, as warranted by the investigation, will be taken.

Languages

This Policy will be provided by WPC in both official languages of Canada.

In this Policy words denoting any gender include all genders and the rest of the sentence is to be construed as if the necessary grammatical changes have been made.

References

WPC Policies
WPC Code of Conduct and Ethics

Communication

WPC will ensure a current version of the Policy is publicized on its organization's website within a reasonable time following the Date of Approval.

WPC and its members will use reasonable efforts to ensure that this Policy is communication to those who will be responsible for upholding it as well as those who will be responsible for its implementation.

Review and Approval

The Whistleblower (Safe Disclosure) Policy has been approved on February 9, 2023. This version was updated to comply with the UCCMS.

The Whistleblower Policy will be reviewed by the Governance Committee every two years.

EXHIBIT A COMPLAINT FORM

This form cannot be used for UCCMS Complaints involving UCCMS Participants, which shall be filed directly with OSIC at www.sportintegritycommissioner.ca

Date: _____ Complainant: _____

Tel: _____ E-mail: _____

Position/Relationship with WPC: _____

Type of Violation: Conduct Violation Legal Accounting/Auditing Retaliation Date

Reporting Person became aware of potential violation: _____

Violation is: Ongoing Completed Unclear whether ongoing or completed

Department suspected of violation: _____

Individual(s) suspected of violation: _____

Describe all of the relevant facts of the violation:

How did Reporting Person become aware of the violation:

Steps taken by Reporting Person prior to contact:

Who, if anyone, may be harmed or affected by the violation?

If violation is legal, estimate amount of loss to WPC as a result of violation:

Actual: _____ Potential: _____

If the violation relates to accounting/auditing matter, estimate the amount of the misreporting and indicate the affected category (or categories) of misreporting:

Amount _____

Category: Assets Liabilities Expenses Revenues Valuation Equity

Provide any suggestions for remedying the violation:
