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| POLICY NAME | WHISTLEBLOWER POLICY | | POLICY NO. | |
| EFFECTIVE DATE | February 3, 2025 | DATE OF LAST REVISION | VERSION NO. | 1 |
| ADMINISTRATOR RESPONSIBLE | Head of Operations | CONTACT INFORMATION | nrobb@volleyballbc.org | |
| APPLIES TO | Employees, contractors, volunteers, Board and committee members of Volleyball BC, and any other people defined as "Individuals" below. | APPROVED BY | HR & Governance Committee | |

1. Definitions

"Individuals" – Refers to all employees, contractors, volunteers, Board and committee members of Volleyball BC.

"Irregularity" - An act in contravention of, or a failure to act in accordance with, legislation, regulations, policies, internal controls or any other obligatory standard where the act or failure to act impacts or has the potential to impact Volleyball BC or individuals or organizations supported by Volleyball BC.

"Reporter" – An Individual who reports an Irregularity in accordance with this policy.

"Respondent"- An Individual who is implicated in a reported Irregularity in accordance with this policy.

2. Purpose

Volleyball BC is committed to maintaining a high standard of public trust and confidence from its members. As a result, Volleyball BC requires the observation of high standards of business and personal ethics in the conduct of the duties and responsibilities. All Volleyball BC Individuals have an obligation to report suspected Irregularities, including violations of federal or provincial law, and violations of Volleyball BC’s policies.

This policy establishes a framework for reporting suspected Irregularities, such as theft, fraud and corruption, which impact or may impact Volleyball BC. This policy also focuses on providing protection to Individuals who make such reports so that they are able to raise their concerns without experiencing retaliation.

3. Scope

This policy applies to all Individuals.

This policy applies to matters that may arise during the business, activities, and sanctioned events of Volleyball BC including, but not limited to, competitions, practices, tryouts, training camps, travel associated with organizational activities, and any meetings.

Examples of Irregularities that are covered by this Policy include, but are not limited to:

- Undisclosed conflicts of interest between an Individual’s duties to Volleyball BC and their personal interests;
- Failure to comply with Volleyball BC health and safety standards;
- Failure of service providers to deliver contracted services;
- Theft or misappropriation of funds or property;
- Intentional, unwarranted or unauthorized departures from Volleyball BC’s accounting policies, procedures or internal controls;
- Intentional misrepresentation of facts;
- Manipulation of accounting records to conceal or alter results;
- Misuse, destruction or unauthorized access of Volleyball BC documents, databases, computer systems, recorded data or messages;
- Intentional false creation or alteration of documents, contract, agreements or any other record;
- Waste or unauthorized use of Volleyball BC funds, resources, records, data or private information;

- Unauthorized compensation, benefits or rights received by an Individual or entity who works within or with Volleyball BC;
- A contravention of legislation or regulation; and
- The intentional concealment of or failure by Individuals to report known irregularities.
- Any other matter which is related to Volleyball BC's business or when any conduct is likely to seriously damage the integrity, image or reputation of the organisation.

For more general feedback about matters that do not fit within the definition of an Irregularity, Individuals are encouraged to use other specific established processes in place.

These may include the following:

- Concerns or complaints related to the *Code of Conduct and Ethics* or breaches of Volleyball BC's policies, bylaws, rules and regulations should be reported in the manner outlined in the *Discipline and Complaints Policy*.
- Concerns related to personal privacy should be reported in the manner outlined in the *Privacy Policy*
- Concerns about alleged workplace bullying or harassment should be reported in the manner outlined in the *Human Resources Policy* or *Staff Issue Resolution Procedure*.
- Concerns about the quality of Volleyball BC programs or services should be reported to the appropriate Volleyball BC staff member.

4. Principles

Volleyball BC encourages the reporting of Irregularities. VBC pledges not to dismiss, penalize, discipline, or retaliate or discriminate against any individual who, in good faith, discloses information or submits a report against a person under the terms of this policy.

Reported Irregularities will be investigated and action will be taken as appropriate.

All parties to an investigation will be treated fairly.

A Reporter may provide a report anonymously which shall be captured through the use of the online form. Volleyball BC may also initiate a written report on behalf of an anonymous Reporter when warranted. Where a Reporter prefers to submit their concern anonymously, and maintain their identity in confidence, Volleyball BC will take every step reasonable in the circumstances to preserve confidentiality unless otherwise required by law. It is important to note that the disclosure of the identity of the Reporter may enable a more thorough investigation and will enable the Reporter to participate in the investigation and know the outcome of any investigation

All information collected during the reporting or investigation of an Irregularity will remain confidential except to the extent disclosure is necessary to:

- Conduct a fair investigation;
- Take corrective or remedial disciplinary, administrative or legal action; or
- Comply with applicable law.

Any person who fails to protect the confidential nature of the investigative process will be subject to disciplinary and/or administrative measures up to and including termination of employment or contractual relationships with VBC for cause.

Volleyball BC will not tolerate:

- Acts of retaliation, reprisal or harassment against Individuals who in good faith report and/or cooperate in an investigation of an Irregularity; or
- Baseless, false or malicious allegations.

Any person who engages in any of these things will be subject to disciplinary and/or administrative measures up to and including suspension or expulsion of membership, or termination of employment or contractual relationships with Volleyball BC for cause.

Anyone who alleges retaliation, reprisal or harassment with respect to a report should file a complaint with the Head of Operations who will then conduct a full review of an allegation of retaliation, reprisal or harassment to determine whether the conduct complained of constitutes reprisal.

5. Reporting an Irregularity

A Reporter's concerns should be reported in written form wherever possible by completing an [online form](#) that will be sent automatically to the Chief Executive Officer. However, the Reporter may choose to make their notification by telephone, virtually (for example, by videoconferencing) or in-person.

The Reporter may choose to notify one or more of the following persons about the Irregularity:

- Head of Operations
- Chief Executive Officer
- Board representative that shall be the Chair of the HR and Governance Committee – HRChair@volleyballbc.org

If an Irregularity is reported in a method other than writing, the person receiving the report will make typed or handwritten notes during the meeting and then confirm the accuracy of their notes with the Reporter. The person receiving the report will then sign and date the record with a notation to the effect that the confirmation with the Reporter was performed.

If the report was received by someone other than the Head of Operations, the person who received the report will then forward the report to the Head of Operations for review and assessment. If the report pertains to the Chief Executive Officer, the report will be sent to the Chair of the HR and Governance Committee who will notify the President of the Board.

6. Investigation and Resolution

The Head of Operations (or Chair of the HR and Governance Committee in the case of a report pertaining to the CEO) will review the report and:

- Connect the Reporter to the alternate liaison if they feel that he or she cannot act in an unbiased or discrete manner due to their role with Volleyball BC and/or the content of the report
- 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)
- Determine if this Policy applies or if the matter should be handled under an alternative policy
- Determine if the local police or RCMP should be contacted
- Determine if mediation or alternate dispute resolution can be used to resolve the issue
- Begin an investigation and establish an Investigation Team
- Notify the Chief Executive Officer that a report has been received (or the President in the case of a report pertaining to the CEO)

The Head of Operations will appoint an Investigation Team that may include the following persons: the Head of Operations, CEO, Chair of the HR and Governance Committee, and/or persons from an independent third party. If one of the members of the Investigation Team is potentially compromised or is the subject of the reported Irregularity, the member will not be part of the Investigation Team.

The Investigation Team will outline a plan for the nature, scope and timing of the investigation. An investigation may include the following elements:

- Follow-up interview with the Reporter
- Identification of Respondents or any affected parties
- Interviews with Respondents and/or affected parties

The Investigation Team will have the authority to recommend the engagement of outside counsel, accountants, investigators and other resources deemed necessary to conduct a full and complete investigation of the concern. The Chief Executive Officer (or the President of the Board in the event of an incident involving the CEO) will, within reason, authorize the expenditure recommended by the Investigation Team.

Except in the case of an anonymous report, a member of the Investigation Team must contact the Reporter as soon as is practical in the circumstances. The primary purposes of this communication to the Reporter are to:

- Advise the Reporter that:
 - The report has been received;
 - An investigation will be conducted and action taken where appropriate; and
 - The Reporter may be contacted for further information as the investigation proceeds.
- Request that the Reporter treats the information contained in the report as confidential in order to avoid compromising any investigation.

If they are not already involved, the Investigation Team will notify the Chair of the HR and Governance Committee that a report is being investigated.

If, during the course of the investigation, the facts appear to be indicative of an illegal act, the Investigation Team will:

- Advise the CEO, Chair of the HR and Governance Committee and President of the Board as soon as practical;
- Consider if and at what stage the investigation should be turned over to the relevant authorities;
- Consider if specialized assistance is required to complete the investigation; and

- Consider the risk of compromising evidence by continuation of the investigation.

On completion of the investigation, the Investigation Team will prepare an investigation report which will include

- Allegations
- Summary of the investigation steps
- Investigation team’s findings of fact and conclusions.

The investigation report is confidential.

If wrongdoing is found, appropriate remedial actions will be taken and/or sanctions imposed. These may include:

- Enacting and/or enforcing policies and procedures aimed at eliminating the wrongdoing or further opportunities for wrongdoing
- Revision of job descriptions or responsibilities
- Discipline, suspension, termination, or other action as permitted by Volleyball BC’s bylaws, provincial employment legislation, Human Resources Policy, and/or employment or contractor agreements.

7. Reporting

The Investigation Team will report to the Chair of the HR and Governance Committee on the status of the investigation at least once a month.

After the conclusion of the investigation, the Investigation Team will contact the Reporter (except in cases where the person who reported the Irregularity has requested not to be contacted) to provide them with a summary of the conclusion of the investigation to the extent that such disclosure does not improperly compromise another person’s rights, privacy or confidentiality or otherwise disclose confidential information.

A copy of the investigation report will be provided to the Chair of the HR and Governance Committee who will share it with the President of the Board.

The Head of Operations will maintain a confidential file of completed investigation reports. The CEO will provide an annual report to the HR and Governance Committee that includes the number of reports and any actions arising (without compromising the confidentiality of the persons involved).

Questions relating to this Whistleblowing Policy should be directed to the Head of Operations.

8. Approval and Review

This policy was approved by the Volleyball BC HR and Governance Committee on February 3, 2025. It will be reviewed every 2 years.

| VERSION HISTORY | | | | |
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| VERSION | APPROVED BY | REVISION DATE | DESCRIPTION OF CHANGE | AUTHOR |
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