



## **Ottawa Gymnastics Centre Whistleblower Policy**

### **Definitions**

1. The following terms have these meanings in this Policy:
  - a) “Whistleblower” – A person who informs on another person or organization on a serious matter that could include an illicit, illegal or unethical activity
  - b) “Violation” – The serious matter being reported
  - c) “Reporting Person” – The Ottawa Gymnastics Centre (OGC) employee who is informing on the serious matter and is therefore acting as the Whistleblower

### **Purpose**

2. This Policy provides OGC employees with information around the reporting of Violations seen as serious matters that may need protection should the Reporting Person be seen as a Whistleblower.
3. The OGC requires that employees observe high standards of business and ethical conduct in performing their duties and responsibilities. Employees of the OGC, must practice honesty and integrity in fulfilling responsibilities and comply with the Bylaws of OGC, applicable policies and procedures of OGC, and all applicable laws and regulations.

### **Reporting Responsibility**

4. It is the responsibility of all employees to report a Violation or suspected Violation of the Bylaws, applicable policies and procedures of the OGC, accounting practices, laws and regulations that govern the operations of the OGC in accordance with this Policy. This Policy is intended to address Violations, which are viewed as serious matters, and should not be utilized as a substitute for complaints that should be addressed pursuant to the OGC’s Discipline and Complaints Policy.

### **Confidentiality**

5. A Violation or suspected Violation may be submitted on a confidential basis by a Reporting Person. Reports of a Violation or suspected Violation will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

### **Reporting Procedure**

6. The OGC has an open door policy and suggests that employees and other individuals share their questions, concerns, suggestions or complaints with the Executive Director. The Executive Director is required to report a suspected Violation to the President of the OGC Board of Directors in writing. Should the matter involve the Executive Director, the Reporting Person should contact the President of the OGC Board of Directors.



**Acting in Good Faith**

7. A Reporting Person who files a complaint concerning a Violation or suspected Violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a Violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

**Investigation**

8. The investigation process will follow that outlined in the Discipline and Complaints Policy, that is that a Case Manager be appointed and that the reported Violation be investigated to resolution.
9. It is essential that all aspects of the investigation be documented in writing for future reference.
10. The outcomes of the investigation may or may not be shared with the Reporting Person, depending on the confidentiality of the results.

**No Retaliation**

11. No Reporting Person, who in good faith reports a Violation, shall suffer harassment, retaliation or any adverse employment consequence, including, but not limited to, termination, suspension, compensation decreases, poor work assignments and/or threats of any nature. Anyone who has been found to have retaliated against a Reporting Person who has reported a Violation in good faith will be subject to discipline as outlined in the Investigation section.
12. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within the OGC prior to seeking resolution outside of the organization. The right of a Reporting Person for protection against retaliation does not include immunity for any personal wrongdoing.