



Whistleblower Policy

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1. GOAL

- 1.1** To provide guidelines for any individual including, but not limited to, national team athletes, Staff, committee members, Board or any other representative, to make a formal complaint related to perceived inappropriate, unethical, illegal or fraudulent conduct associated within Cycling Canada activities.

2. PRINCIPLES

- 2.1** Cycling Canada is committed to providing an environment in which the organization acts within a Code of Conduct, policies and applicable laws. Cycling Canada observes the highest standards of business and personal ethics in the conduct of its responsibilities.
- 2.2** Cycling Canada shall endeavor to make available, always, an Ombuds to whom those within the field of application identified below may relay complaints or reports of inappropriate, unethical, illegal or fraudulent conduct. The Ombuds shall be a person or organization not involved in the day-to-day operation of the organization and not a member of the Board.

3. FIELD OF APPLICATION

- 3.1** This Policy only applies to Cycling Canada activities. Matters reported under the terms of this Policy may be referred to the appropriate Cycling Canada policy at the discretion of the Ombuds.
- 3.2** Cycling Canada pledges not to dismiss, penalize, discipline, retaliate or discriminate against any individual who discloses information or submits, in good faith, a report under the terms of this Policy. Any individual affiliated with Cycling Canada who breaks this pledge will be subject to disciplinary action.

4. DEFINITIONS

- 4.1** Complainant: The party reporting the alleged infraction or issue.
- 4.2** Respondent: The Respondent is the person or organization that is required to respond to the complaint/report made by the Complainant.
- 4.3** Ombuds: The external organization or individual identified to administer the complaint process.

- 4.4** Investigator: An external individual with conflict resolution experience as recommended by the Ombuds to execute on an impartial investigation between Complainant and Respondent.
- 4.5** Investigators Report: A document prepared by the Investigator to include all findings and an impartial decision made with regards to the case while omitting names whenever possible and striving to ensure confidentiality of both Complainant and Respondent.
- 4.6** Staff: An individual recognized by CC operating in a full-time, part-time, term, contract, or volunteer capacity

5. POLICY STATEMENT

- 5.1** Any individual, who wishes to file a formal complaint related to perceived inappropriate, unethical, illegal or fraudulent conduct associated with Cycling Canada activities may do so without fear of unfair treatment or reprisal.

6. PROVISIONS

6.1 Reporting Procedure

- 6.1.1** An individual should submit any allegation of wrongdoing using the Whistleblower Complaint Submission form to the Ombuds e-mail address as indicated in Annex A.
- 6.1.2** Cycling Canada has appointed the following Ombuds to receive reports made under this Policy:
- Brian Ward
Ombuds
safesport_wwdrs@primus.ca
- 6.1.3** After receiving the report, the Ombuds has the responsibility to:
- Assure the Complainant of Cycling Canada’s pledge against reprisal,
 - Determine if the report is frivolous, vexatious, or not submitted in good faith,
 - Determine if the Cycling Canada’s Whistleblower Policy applies or if the matter should be handled under another Cycling Canada policy,
 - Determine if the local police service should be contacted,
 - Determine if mediation or alternate dispute resolution can be used to resolve the issue,
 - Determine if the Cycling Canada’s Chair and/or CEO should or can be notified of the report,
 - Begin an investigation, and/or
 - Notify the Complainant whether the report is moving forward to an investigation or if such a report is not covered under this policy.

6.2 Investigation

- 6.2.1** The Ombuds may determine that an investigation should be launched, and the Ombuds

may decide to contract an external Investigator. In such cases, the Organization's CEO and/or Chair shall be notified (except in the case where the Chair and/or CEO are implicated) that an investigation conducted by an external Investigator is necessary, without disclosing the nature of the investigation, content of the complaint or report, or identity of the Complainant who submitted the report. Cycling Canada's CEO and/or Chair may not unreasonably refuse the decision to contract an external investigator.

6.2.2 An investigation should generally take the following form:

- Follow-up interview with the Complainant,
- Identification of Staff, participants, committee members, Directors, or other representatives who may have been affected by the wrongdoing,
- Interviews with affected individuals,
- Interview with the Respondent, and
- Interview with the supervisor(s) of the Respondent.

6.2.3 In all stages of the investigation, the Investigator will take every precaution to protect the identity of the Complainant and/or the specific nature of the report itself. However, Cycling Canada recognizes that there are some instances where the nature of the report and/or the identity of the Complainant will or may be inadvertently deduced by individuals participating in the investigation.

6.2.4 The Investigator will prepare an Investigator's Report, omitting names whenever possible and striving to ensure confidentiality, that will be submitted to Cycling Canada's Chair and/or CEO for review and action.

6.3 Action

6.3.1 Within fourteen (14) days after receiving the Investigator's Report, Cycling Canada's Chair and/or CEO will initiate corrective action, as recommended. Corrective action may include, but is not limited to:

- Contacting the local police service,
- Enacting and/or enforcing policies, bylaws and procedures aimed at eliminating the wrongdoing or further opportunities for wrongdoing,
- Revision of job descriptions, and
- Discipline, suspension, termination, or other action as permitted by Cycling Canada's Bylaws, Cycling Canada's policies, applicable employment standards legislation, and/or an employment agreement, contractor agreement, or Director agreement as applicable.

6.3.2 The corrective action, if any, will be communicated to the Investigator or Ombuds who will then inform the Complainant.

7. REVIEW AND APPROVAL

7.1 Original policy development lead: Greg Mathieu.

7.2 Current policy development lead: Brian Ward, Mark Gilligan, Bill Kinash, Mathieu Boucher, Kelly Murray, Scott Kelly.



ANNEX 'A'

Whistleblower Complaint Submission Form

To formally make a complaint or report under the terms of Cycling Canada's Whistleblower Policy, please complete this form and submit it to the email address below. Your report and identity will not be shared without your consent.

Complainant's Name: _____ Email Address: _____

Role / Position with Cycling Canada: _____

Description of the issue:

Other parties involved in the issue (with contact information, if known):

Do you want the Ombuds to keep your identity confidential?

Please submit this Form to:

safesport_wwdrs@primus.ca
W&W Dispute Resolution Services Inc.