Whistleblower Policy

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Canada Soccer

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I. TERMINOLOGY

"Anonymous" means unknown authorship, and without designation that might lead to information about the authorship. Anonymity is not compromised by assignment of a code or other designation with which a person can communicate without revealing his or her identity.

"Confidential" means authorized for access by only those persons who have a need to know. Ordinarily, a need to know arises from an obligation to investigate or to take remedial or disciplinary action.

"Submission of Concern" means any information provided to the External Service Provider, whether in the form of a concern, a demand for remedial action, or a report of actual or suspected Wrongdoing.

“Wrongdoing” means unethical, illegal, or fraudulent conduct.

II. PURPOSE

The purpose of this Policy is to encourage and enable individuals to safely report allegations of actual or potential Wrongdoing without fear of reprisal.

The Board of Directors (the Board) of the Association is responsible for ensuring that a confidential and anonymous process exists whereby persons can express any concerns or complaints about Wrongdoing.

III. APPLICATION OF THIS POLICY

This Policy is intended to supplement the Association’s *Code of Conduct and Ethics*[1] and *Disciplinary Code*[2] covering conflicts of interest, gifts and hospitality, other conduct violations such as maltreatment, and any applicable provincial and federal laws governing whistleblowing actions. This Policy applies to all categories of membership defined in the Association’s Bylaws and to Officials, players and individuals employed or engaged by the Association. The Policy also applies to the Directors of theMember Associations, Professional Club Members, League Members, or any other individuals who perform duties on behalf of these Members when the Members are engaged in soccer-related activities, whether on or off field, sanctioned by the Association.

This Policy applies to any matter which is related to the Association’s business or when any conduct is likely to seriously damage the integrity, image or reputation of the Association.

[1] Canada Soccer’s Code of Conduct and Ethics
[2] Canada Soccer’s Disciplinary Code

A. EXTERNAL SERVICE PROVIDER

The General Secretary will appoint an individual or group to act as the External Service Provider per this Policy. Submissions of concern are reported to the External Service Provider.

B. METHODS FOR FILING A SUBMISSION OF CONCERN

The following procedures are intended to ensure that any submission of concern is promptly and effectively addressed. All submissions of concern shall be treated as confidential, whether received anonymously or otherwise. The procedures for submission of concern, and any changes thereto, shall be made available internally and published on the Association's website.

All submissions of concern should be supported with as much factual detail as possible, including dates, names and places. Appendix 1 includes a form to prepare a submission of concern.

Options:

(a) Contact the Sport Integrity Canada Helpline at 1-866-971-2777. The Sport Integrity Canada Helpline is a free, anonymous, confidential, and independent service in both official languages; or

(b) File a Complaint or Report Online https://sportintegrity.ca/report-safe-sport

All submissions should include contact information in the event an investigation takes place and additional information is necessary.

C. PROCESS FOR ADDRESSING SUBMISSIONS OF CONCERN

A person submitting a submission of concern shall be provided the opportunity to remain anonymous, save and except in those circumstances where the nature of the disclosure and/or the resultant investigation make it necessary to disclose identity (e.g., legal investigations). In such cases, all reasonable steps shall be taken to protect the person reporting from harm as a result of having made a disclosure. Theidentity of the person submitting a report shall remain confidential unless the person and the OSIC and/or the Ethics Committee agree otherwise. The infographic in Appendix 2 reflects the process that is initiated once a submission of concern is received.

IV. ROLES & RESPONSIBILITIES

IV-1: The External Service Provider

The External Service Provider shall:

- Be familiar with Canada Soccer's *Code of Ethics* and *Disciplinary Code*;
- Screen the submission of concern to determine whether it falls within the jurisdiction of the Association;
- Respond to the individual who made the submission to confirm receipt and inform them of one of the following:

    - that the submission of concern will be considered and will be sent to the Ethics Committee; or
    - that the submission of concern is not within the jurisdiction of the *Whistleblower Policy* and they should submit their concern/complaint under another jurisdiction (the External Service Provider will advise the individual of the proper jurisdiction, if possible).
- If the submission of concern is accepted, forward the concern to the Ethics Committee within 24 hours. In the event that members of the Ethics Committee are named in the submission of concern, the report will be made to the Risk Oversight Committee instead.
- Provide recommendations related to the effectiveness of the Policy and its implementation to the Chair of the Risk Oversight Committee as needed; and
- Provide an annual report to Canada Soccer that lists:
    - The number of concerns that were sent to the Ethics Committee;
    - The number of concerns received that were not accepted along with the reason for each;
    - The province/territory where the submission of concern was alleged to take place; and
    - Whether the submission of concern was made by an organization, a coach, a referee, a volunteer, a Director, or a member of the public;
    - Whether the submission of concern was alleged against an organization, a coach, a referee, a volunteer, a Director, or a member of the public; and
    - The status of each active submission of concern.

IV-2: The Chair of the Ethics Committee

The Chair of the Ethics Committee shall:

- Be familiar with Canada Soccer's *Code of Ethics* and *Disciplinary Code*;
- Receive all submissions of concern sent by the External Service Provider;
- Request additional information from the External Service Provider if they are unsure if the correct determination regarding jurisdiction has been made;
- Determine if the submission of concern constitutes Wrongdoing. If the submission does not constitute Wrongdoing, the Chair of the Ethics Committee will forward the submission to the Risk Oversight Committee with recommendations as to how to address the submissions (e.g., with the employee, through using the Code, with the employee's supervisor, or with the individual named in the submission).
- In the event the Chair of the Risk Oversight Committee is named in the submission of concern, the President and/or Vice President of the Association shall be notified as appropriate;
- Carry out the necessary investigations as they deem appropriate;
- Alert the Chair of the Risk Oversight Committee and the President that an investigation is being carried out because a submission of concern was submitted and accepted per the *Whistleblower Policy*.
- Inform the President if support from Canada Soccer staff or from the External Service Provider is appropriate, in order to carry out any investigations;
- Refer the submission of concern to the Disciplinary Committee or the General Secretary, as appropriate;
- Provide recommendations related to the effectiveness of the Policy and its implementation to the Chair of the Risk Management Committee as needed;
- Prepare written reports to the Chair of the Risk Management Committee upon request; and

- Communicate the findings and recommendations (including any suggestion for corrective actions) resulting from any investigation they undertake.

IV-3: The Chair of the Risk Oversight Committee

The Chair of the Risk Oversight Committee shall:

- Be familiar with Canada Soccer's *Code of Ethics* and *Disciplinary Code*;
- Request an annual Whistleblower Report from the External Service Provider that includes the following information:
    - the date of receipt of each concern;
    - the date that accepted concerns were sent to the Ethics Committee;
    - a description of each submission that did not fall under the jurisdiction of the Policy and how the submission was redirected (if applicable);
    - The province/territory where the submission of concern was alleged to take place; and
    - Whether the submission of concern was made by an organization, a coach, a referee, a volunteer, a Director, or a member of the public;
    - Whether the submission of concern was alleged against an organization, a coach, a referee, a volunteer, a Director, or a member of the public; and
    - The status of each active submission of concern.
- Provide recommendations related to the effectiveness of the Policy and its implementation to the Risk Oversight Committee as needed; and
- Report to the Risk Oversight Committee at each meeting on all active submissions of concern.

IV-4: The Risk Oversight Committee

The Risk Oversight Committee shall:

- Review the annual Whistleblower Report; and
- Review the Policy annually and propose updates to the Board of Directors for approval.

IV-5: The Board of Directors

The Board of Directors shall:

- Review the annual Whistleblower Report;
- Consider proposed revisions to this Policy made by the Risk Oversight Committee; and
- Take appropriate actions as a result of any concerns or Policy recommendations.

IV-6: General Secretary

The General Secretary is responsible to:

- Ensure that a confidential and professional External Service Provider is available;
- Communicate this Policy externally;
- Ensure that the results of any investigation are appropriately filed;
- Assist the Chair of the Ethics and Risk Oversight Committees in implementing this Policy as required;

- Provide recommendations related to the effectiveness of the Policy and its implementation to the Chair of the Risk Oversight Committee as needed; and
- Ensure appropriate corrective actions and recommendations are implemented as directed.

V.SAFEGUARDS / NON-DISCRIMINATION

V-1: No Retaliation

A person is protected against retaliation as a result of having made, in good faith, a report which the person believes to be valid or as a result of such person having otherwise assisted in the investigation of the report. Retaliation against a person who raises a concern, in good faith, will not be tolerated and is considered a violation of the *Code of Conduct and Ethics and Disciplinary Code*.

Any effort to retaliate against any person filing a submission of concern in good faith must be reported immediately to the Chair of the Ethics Committee ethics@canadasoccer.com. If an individual believes that someone who has made a report of a violation or someone who has cooperated in the investigation of a violation is suffering from harassment, retaliation or other adverse employment conditions, the individual should file a complaint under the Code.

V-2: Untrue / False Allegations

If an individual makes an allegation in good faith and the allegation is not confirmed by subsequent investigation, no action will be taken against that individual. However, if the investigation reveals that an individual has made deliberately false or malicious or vexatious allegations, such instances will be viewed as serious offences which may result in disciplinary action.

VI. RETENTION OF RECORDS FOR SUBMISSIONS OF CONCERN

Records pertaining to a submission of concern are the property of Canada Soccer and shall be retained:

- in compliance with applicable laws and document retention policies; and
- subject to safeguards that ensure their confidentiality, and, when applicable, the anonymity of the person filing the submission of concern.

VII. COMMUNICATION

This Policy will be made available to all employees, athletes, Members, and Directors of Canada Soccer, and any

revised version shall be made available within 72 hours and easily accessible on the Canada Soccer website.

VIII. ENQUIRIES

Any enquiries regarding clarification, interpretation, and administration of this Policy shall be directed to the External Service Provider.

Initially adopted by the Board of Directors on May 5, 2019. Version 2.0 was approved on November 27, 2021. Version 3.0 was approved on September 16, 2023.

Appendix 1 – Submission of Concern Form

Note: This Submission of Concern Form is intended to be used as a guideline for the submission of concerns pursuant to the Whistleblower Policy. Please include additional pages as necessary.

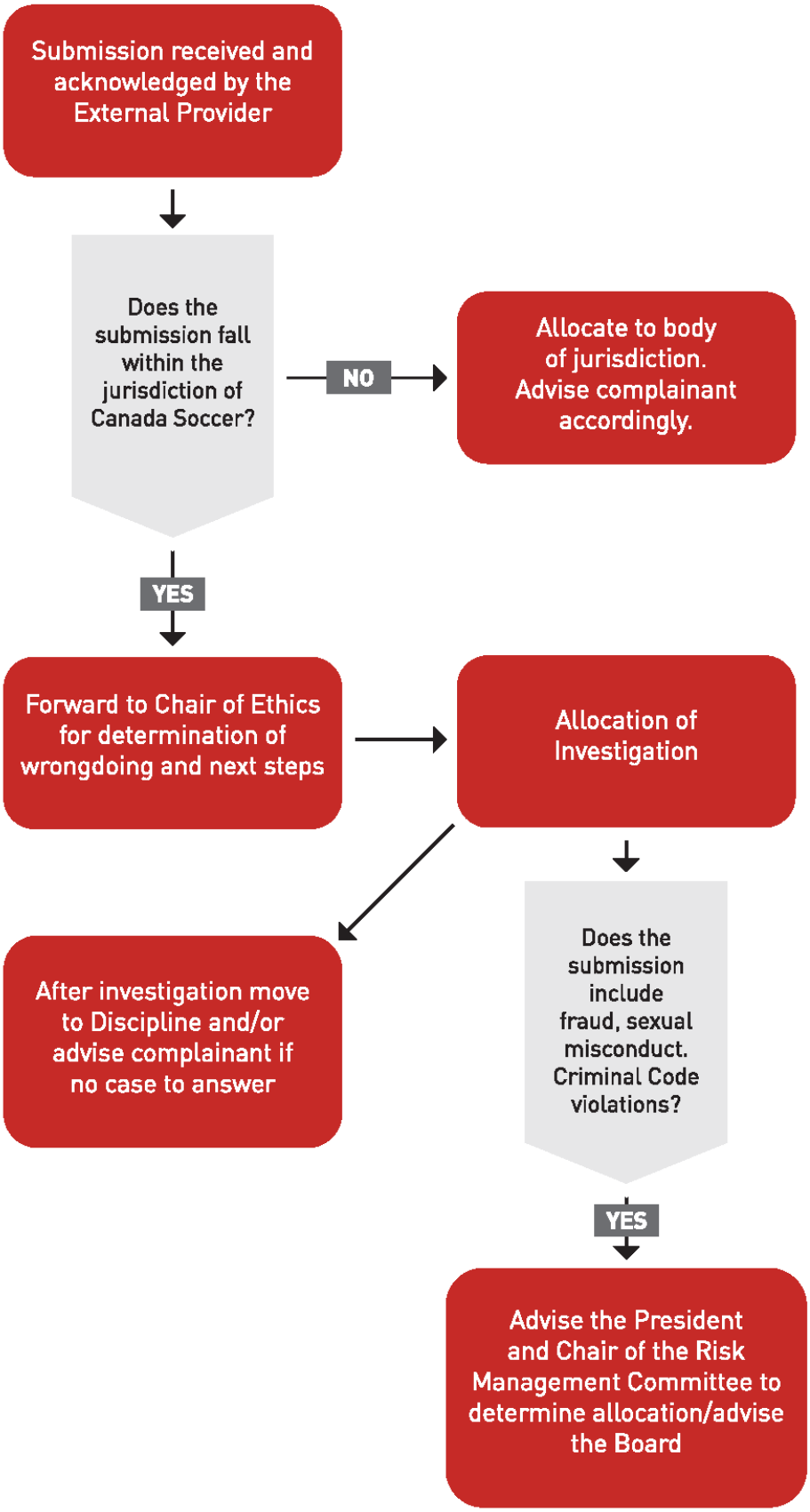
Organization: _____

1. **Please describe the incidents that you witnessed and/or are concerned about:**

2. **Please identify the individuals, with their position(s) if known, involved in the incidents:**

3. **Please describe why you believe the incidents you witnessed or are concerned about constitute a crime and/or meet the definition of wrongdoing as described in the *Whistleblower Policy*:**

4. **OPTIONAL. Please identify yourself and provide your role(s) and contact information:**
   Note: Submissions of Concern may be reported anonymously.

Please send your Submission of Concern Form and all supporting documentation to:
safesoccer@canadasoccer.com

Appendix 2 – Whistleblower Process Flowchart