



Member, United States  
Olympic & Paralympic Committee

# PARALYMPIC OPERATIONS DEPARTMENT

Whistleblower Policy

## Table of Contents

<b>1. Purpose .....</b>	<b>3</b>
<b>2. Violations Covered by this Policy.....</b>	<b>3</b>
<b>3. Reporting .....</b>	<b>3</b>
<b>4. Investigation .....</b>	<b>4</b>
<b>5. Confidentiality.....</b>	<b>5</b>
<b>6. Follow Up .....</b>	<b>5</b>

## 1. Purpose

This Whistle-Blower Policy (the “Policy”) is intended to support a strong culture of integrity and ethical conduct within the Paralympic Operations Department (POD) by encouraging, valuing, and protecting good faith reporting by athletes, Council Members and officers, staff members, members of sport(s) managed by the POD, committee members, task force members, hearing panel members, and volunteers (“Affiliated Individuals”) of the POD of any alleged violation of any applicable law or policy or any potential ethics issue.

The freedom to speak up means being able to raise concerns in whatever way is most comfortable and effective and feeling free to cooperate in investigations that follow. It also means that the POD has zero tolerance for retaliation of any kind against people who speak up in good faith.

## 2. Violations Covered by this Policy

This Policy is for use where there may be a violation of:

- any applicable law, rule or regulation
- any POD policy
- principles of ethics
- accounting or financial practices (e.g., fraud)
- compliance with the Act
- Compliance with UPOC Bylaws

If an Affiliated Individual is unsure about whether a matter might be a policy violation or is unsure about their reporting responsibility for a particular type of matter, please start by reviewing the particular policy involved. The POD staff should refer to [www.logan.edu/usapp](http://www.logan.edu/usapp) or reach out to the Executive Director of the POD or the Vice President of Human Resources at Logan University (Logan) for more information.

Also, keep in mind that some violations **must** be reported. Specifically, please be familiar with the requirements in the POD Athlete Safety/SafeSport Code and Code of Conduct. And of course, if an Affiliated Individual suspect any criminal activity against a person or property, they should report this directly to law enforcement immediately.

**Nothing in this Policy changes or replaces any mandatory reporting obligations under the US Center for SafeSport Code for the Olympic and Paralympic Movements – talk to the Executive Director of the POD if you have any questions about those obligations.**

## 3. Reporting

### No Retaliation

The POD has an open-door policy and encourages Affiliated Individuals to share questions, concerns, suggestions or complaints in the way and to the people with which they are most

comfortable. This means Affiliated Individuals have options for how to report any concern about a potential ethical, policy, financial or legal violation.

The POD has zero tolerance for retaliation against people who make good faith reports of potential ethical, policy, financial or legal violations, or who cooperate with investigations of those reports. That means no Affiliated Individual may threaten, harass, discriminate against, or take any negative employment (where applicable) or participation related action (e.g., discharge, demotion, suspension, non-assignment, negative review) on that basis.

Any such retaliation can be reported as described above in the same way as any other policy violation. It will be treated as a violation this Policy and POD's Code of Conduct and may lead to serious consequences including termination of within the POD or participation at any POD event for anyone involved in retaliation.

#### How to Report

Affiliated Individuals may always report to a POD staff member or their supervisor (if applicable). Or, the Affiliated Individual can make a report to the Executive Director of the POD, or the Vice President of Human Resources at Logan. These are people who can also discuss the concern and help make sure it is addressed. Affiliated Individuals can also make reports to the Chair of POD's Ethics Committee.

Please remember that as a reporter, Affiliated Individuals do not need to (and should not) investigate the matter of concern or determine fault or how to fix it. The Affiliated Individual does his or her part by making it known so the right people can take action. Investigations or of reports are discussed below.

#### Acting in Good Faith

Just as we need to make sure that no one in our community is fearful of speaking up, we also need to make sure that no one in our community is fearful about false reports that might harm them.

With that in mind, anyone reporting a perceived ethical, policy, financial, or legal violation must be acting in good faith and have some basis for believing there may be a violation. Anyone that makes a false report knowing that it is false or that it has no basis is violating this Policy and the POD's Code of Conduct in the same way as someone retaliating against a good faith reporter. Such a violation may itself be reported under this Policy and it may lead to serious consequences, including termination of employment within the POD or participation in POD events.

## **4. Investigation**

In accordance with the process described in the POD's Grievance Procedures, investigations will be handled by the same process described in the in the POD Grievance Procedures including who investigates the alleged violation, who make the determination on the alleged

violations, including athlete involvement required, and if the decision is executed by disinterested parties. See the POD Grievance Procedures for details. See the POD Grievance Procedures for details.

The Executive Director of the POD is responsible for coordinating among these people so that reporters can be confident that reported concerns get to the people best positioned to act on them. The Executive Director of the POD will report regularly to the POD's ethics committee.

## **5. Confidentiality**

In many cases, a reported matter will need investigation in order to reach the right resolution. Cooperation as a reporter or otherwise may be very helpful and much appreciated. Reports will be treated as confidentially as possible; some information may have to be disclosed to certain parties in order to conduct a thorough investigation, to comply with the law, and to provide accused individuals access to due process.

If a matter is reported anonymously and the reporter chooses to remain anonymous as it is investigated, the POD will respect that.

## **6. Follow Up**

If an Affiliated Individual reports an alleged violation of ethics, the POD policy, or applicable laws, the POD will report back to the Affiliated Individual on the progress and investigation results as appropriate. And of course, the Affiliated Individual is always free to follow up to learn more from the person they reported to. Confidentiality and legal obligations may affect the details available.

Reports and follow ups will be assigned to the appropriate POD committee as defined in the POD Handbook and within the procedures of the appropriate POD policy to ensure conflicted individuals are not involved in the decision-making process

If the investigation of a report that was made in good faith is not to the satisfaction of the reporter, then the reporter may report that, too.