



Whistleblower (Reporting Concerns) Policy

<p>Policy Statement</p>	<p>This policy describes Special Olympics New Zealand’s commitment to encouraging an open, honest, and transparent culture in conducting all its activities with integrity, in a legal and ethical manner.</p>
<p>Purpose</p>	<p>Special Olympics New Zealand (SONZ) is committed to conducting its activities with integrity and in a legal and ethical manner. We promote an open, honest and transparent culture. We are committed to maintaining an environment in which individuals are able to raise concerns regarding actual or suspected serious wrongdoing.</p> <p>To encourage reporting of serious wrongdoing, requires a process whereby Special Olympics New Zealand personnel can report concerns freely and without retaliation or intimidation.</p> <p>The purpose of this Policy is to facilitate the disclosure and investigation of serious wrongdoing in or by Special Olympics New Zealand to meet its obligations under the Protected Disclosures Act 2000 to protect employees who disclose serious wrongdoing.</p> <p>If you are aware of any possible serious wrongdoing within Special Olympics New Zealand, you have a responsibility to disclose that information at the earliest opportunity for further investigation. One way to do that, if the wrongdoing is serious, is to make a protected disclosure (commonly referred to as a “Whistleblower complaint”) using the process set out in this Whistleblower Policy.</p>
<p>Scope</p>	<p>This Policy applies to all Special Olympics New Zealand personnel (including employees, contractors, athletes, and coaches). For the purposes of this policy, Special Olympics New Zealand personnel also include officials and volunteers, and former Special Olympics New Zealand Personnel.</p>



<p>Definitions</p>	<p>Whistleblower All Special Olympics New Zealand personnel who make a report in good faith under this Policy in connection with serious wrongdoing (disclosure) and wants to protect themselves against retaliation for having made the disclosure.</p> <p>Whistleblower Protection Officer (WPO) A designated Special Olympics New Zealand representative responsible for protecting and safeguarding the interests of whistleblowers. The WPO will have access to independent advisors as required. Special Olympics New Zealand’s WPOs are the CEO, Sports Director, RSC Director & Events Director.</p> <p>Whistleblower Investigations Officer (WIO) A designated Special Olympics New Zealand representative with responsibility for conducting preliminary investigations into disclosures received from a whistleblower. The WIO will investigate the substance of the disclosure to determine whether there is evidence in support of the disclosure, or alternatively to refute the disclosure. The WIO will be appointed by the WPO on a case by case basis, depending on the nature of the disclosure and will be a person who is not associated with the area under investigation. A WIO may be an internal or external person, depending on the circumstances.</p>
<p>Reporting Serious Wrongdoing</p>	<p>If a Special Olympics New Zealand employee, former employee, contractor, player, or volunteer becomes aware of serious wrongdoing, they are encouraged to report the conduct. This Policy is one way of reporting wrongdoing. Wrongdoing may also be reported through normal communications channels. For example:</p> <ul style="list-style-type: none"> • Whistleblowers may wish to discuss the matter informally with the CEO, direct manager or another Special Olympics New Zealand manager in the first instance to determine whether an incident of serious wrongdoing has occurred. At all times these discussions will remain confidential. The whistleblower may also contact the WPO directly to informally discuss the incident or they can formally report the serious wrongdoing in writing to a WPO.



<p>What to include in your disclosure?</p>	<p>You should include enough information to enable the WIO to investigate the matter fully and fairly. If you would prefer to remain anonymous, you may record your concern or allegation in a way that does not reveal your identity. However, providing details of your identity and being available to participate in the investigation can assist the WIO to ensure that the suspected serious wrongdoing is able to be fully investigated.</p> <p>The type of information to include in your disclosure is:</p> <ul style="list-style-type: none"> ✓ Names of people involved ✓ Names of any witnesses ✓ Date, time and location of incident(s) ✓ Details of any proof (including relevant documentation whether hardcopy or electronic) ✓ Money or assets involved ✓ How often this incident has happened <p>It is important that you keep the matter confidential and do not discuss it with other personnel or potential witnesses. This is to avoid any potential conflicts of interest and/or so that if there is an investigation about the matter later, those individuals would be able to provide an independent account of events to the investigator.</p>
<p>Investigation</p>	<p>All reports of serious wrongdoing will be treated seriously and be the subject of a thorough investigation with the objective of finding evidence that either substantiates or refutes the allegations made by the whistleblower. Investigations are undertaken by the WIO who will respond to all concerns raised and report to the WPO.</p> <p>Following a report of serious wrongdoing, the following procedure is followed:</p> <ul style="list-style-type: none"> • The WPO will provide the report to the WIO. • The WIO will review the report and determine the appropriate process for investigation and inform the whistleblower and WPO. The WPO will inform the whistleblower of how the investigation will proceed. • The WIO will determine what resources are needed, such as assistance of other



	<p>personnel or external professional advice.</p> <ul style="list-style-type: none"> • The WIO will conduct the investigation. • The WIO will prepare an investigation report and provide this to the WPO and CEO or, if relevant, Chair. • The WPO will advise and debrief the whistleblower on the outcome.
<p>Reporting the Investigation Findings</p>	<p>The WIO will report their findings to the CEO who will determine the appropriate response. The response will include addressing any unacceptable conduct and remedial action to prevent future occurrences of the same behaviour. In the event of the CEO being the subject of an investigation or allegation, the Chair will determine the appropriate response.</p> <p>Where allegations of serious wrongdoing made against another person cannot be substantiated, that person will be advised accordingly.</p>
<p>Whistleblower Anonymity</p>	<p>The identity of the whistleblower will be kept strictly confidential by the WPO and WIO unless:</p> <ul style="list-style-type: none"> • The whistleblower consents to disclosure of their identity. • The disclosure is required by law. • Disclosure is necessary to prevent serious risk to public health or public safety or the environment. • Disclosure is necessary to ensure that a fair process (natural justice) is followed in relation to the disclosure. • Disclosure is necessary to protect or enforce Special Olympics New Zealand's legal rights or interests. • Disclosure is necessary to defend any claims.
<p>External Disclosures</p>	<p>In some circumstances, it may be appropriate to make a disclosure to an external agency. For example, the New Zealand Police. To make a protected disclosure, you are required to use the internal process outlined in this Policy unless:</p> <ul style="list-style-type: none"> • you believe on reasonable grounds that the CEO is or may be involved in the serious wrongdoing; • you believe that the matter is so urgent or there is some other exceptional circumstance that would justify them

