

College Club Swimming Whistleblower Policy and Reporting Procedure

V1.0, approved 12/15/2024

1. POLICY OVERVIEW

- 1.1. College Club Swimming (CCS) is committed to supporting camaraderie, friendship, and sportsmanship among its membership.
- 1.2. CCS encourages individuals to disclose misconduct, without fear of retaliation, where concerns about instances of misconduct and violation of a CCS Rule or Policy are supported by reasonable grounds.

2. PURPOSE

- 2.1. To facilitate an environment in which the reporting of any instances of suspected misconduct or violation in relation to CCS is encouraged without fear of retaliation.
- 2.2. To ensure that wrongdoings are reported if/when they occur, and are dealt with appropriately and fairly.
- 2.3. To enforce adherence to CCS's rules and policies across all Member Clubs, the CCS Advisory Board and CCS staff greatly appreciate any initiative to report violations and misconduct.

3. COMPLAINT

- 3.1. A complaint concerns a disclosable matter where a person has objectively reasonable grounds to suspect that the information indicates:
 - 3.1.1. A violation of the CCS Governance Handbook.
 - 3.1.2. A violation of a CCS Policy.
 - 3.1.3. A violation of a CCS Championship Meet Packet.
 - 3.1.4. Misconduct in relation to the CCS organization.

4. NON-COMPLAINT

- 4.1. This policy is intended for disclosures of information that have implications for the CCS organization. A report will be deemed a non-complaint if it does not meet the definition of a complaint as defined by this policy.

5. REPORTING PROCEDURE

- 5.1. A report can be made by email to colleageclub@usmastersswimming.org by any person.
- 5.2. The person who submits a complaint shall be defined as the whistleblower.
- 5.3. A report should include the following information:
 - 5.3.1. Names of all clubs and individuals involved;
 - 5.3.2. Evidence, including pictures, videos, and any other knowledge or material applicable to the report;
 - 5.3.3. Date and location of the violation or misconduct.
- 5.4. A report should include any evidence and as much information as possible to justify the complaint.
- 5.5. CCS will confirm that the report has been received.

5.6. The CCS Advisory Board will determine whether or not the report qualifies as a complaint as outlined in this policy. Additional information from the whistleblower may be requested.

5.6.1. If the report is deemed a complaint, an investigation may take place as outlined by this policy.

5.6.2. If the report is deemed a non-complaint, no further action may be taken by the CCS AB. However, the complaint may be deferred to the applicable governing body.

6. INVESTIGATION

6.1. CCS will investigate the validity and severity of the complaint. Additional information from the whistleblower may be requested.

6.2. As part of its investigation, the CCS Advisory Board will do the following:

6.2.1. Keep the whistleblower and their complaint confidential;

6.2.2. Be thorough, diligent, and act ethically;

6.2.3. May seek additional information and evidence from sources besides the whistleblower and the complaint itself.

6.3. Individual AB members (or National Board of Review members) must disclose any possible conflict of interest, and may be recused from the investigation and decisions of further action if a conflict of interest is found.

6.4. The CCS Advisory Board may take further action based on the findings of the investigation as permitted by the CCS Governance Handbook or by a CCS Policy.

6.5. CCS is not required to inform the whistleblower of the findings of any investigation, or any actions taken as a result of those findings.

7. ANTI-RETALIATION

7.1. No whistleblower shall suffer harassment, intimidation, or any other adverse consequences for making a good faith report to CCS.

7.2. No Advisory Board member, liaison, USMS employee, or other agent of College Club Swimming shall take or threaten to take any action against the whistleblower or another individual or group for disclosing information.

7.3. The Advisory Board reserves the right to take further action if retaliation is suspected or reported.