

Whistleblower (Protected Disclosures) Policy

April 2026

1. Purpose

Archery NZ is committed to the highest standards of integrity, transparency, and accountability. This Whistleblower (Protected Disclosures) Policy provides a safe and confidential process for individuals to raise concerns about serious wrongdoing within Archery NZ, without fear of retaliation.

This policy aligns with:

- The **Protected Disclosures (Protection of Whistleblowers) Act 2022**
- Sport NZ governance expectations
- Good practice across National Sporting Organisations in New Zealand

2. Scope and Application

This policy applies to:

- Board members
- Employees and contractors
- Committee members and officials
- Volunteers
- Athletes and members
- Any other person with a relationship to Archery NZ

A discloser may choose to report a protected disclosure directly to an appropriate external authority without first reporting the matter internally to Archery NZ, where permitted under the Protected Disclosures (Protection of Whistleblowers) Act 2022. They may include but are not limited to: Sport NZ, Sports Integrity Commission, Police and Worksafe.

This policy applies to disclosures about matters connected to Archery NZ's activities, governance, or operations.

This Whistleblower Policy applies only to disclosures of serious wrongdoing as defined in this policy. Where a concern does not meet the threshold for serious wrongdoing, Archery NZ will ensure the matter is managed through the appropriate alternative process (e.g., Code of Conduct, Constitution, Member Protection Policy). Archery NZ will inform the individual where a concern does not qualify as a protected disclosure and guide them to the appropriate process.

3. What Can Be Disclosed (Serious Wrongdoing)

A protected disclosure may be made where the discloser believes, on reasonable grounds, that the information shows or tends to show serious wrongdoing, including but not limited to:

- Unlawful, corrupt, or fraudulent behaviour
- Serious misuse of Archery NZ funds or resources
- Conduct that poses a serious risk to health, safety, or wellbeing
- Serious breaches of Archery NZ's Constitution or policies
- Bullying, harassment, or abuse where systemic or serious in nature
- Actions that may seriously damage Archery NZ's reputation or integrity

This policy is not intended to replace ordinary complaint, grievance, or disciplinary processes, unless those processes are inappropriate due to the seriousness or sensitivity of the matter.

For the purposes of this policy, serious wrongdoing includes the categories set out in section 10 of the Protected Disclosures (Protection of Whistleblowers) Act 2022.

4. Who Can Make a Protected Disclosure

A protected disclosure may be made by any individual covered under this policy who has information about serious wrongdoing in connection with Archery NZ.

The discloser does not need to be directly affected by the wrongdoing.

5. How to Make a Protected Disclosure

A protected disclosure should be made as soon as reasonably practicable and may be made:

Primary recipient:

- The Board Chair of Archery NZ

Alternative recipients (if appropriate):

- The Deputy Chair or another Board member
- The Operations Manager
- An external authority as permitted under the Protected Disclosures Act (for example, Sport NZ, Sports Integrity Commission, the Registrar of Incorporated Societies, or another appropriate authority)

Disclosures should be made in writing where possible, but verbal disclosures will also be accepted.

6. Confidentiality

Archery NZ will take all reasonable steps to protect the identity of a discloser and maintain the confidentiality of information received through a protected disclosure.

Access to identifying information

Identifying information will be accessible only to those who reasonably require it to assess the disclosure, determine next steps, conduct an investigation, or meet legal obligations. This will normally be limited to designated disclosure recipients, investigators, and professional advisers.

Identifying information will not be shared more broadly with the Board, staff, or others, unless required by law, necessary to progress the investigation, or essential to meet principles of natural justice.

Redaction and anonymisation

Archery NZ may remove or anonymise identifying details to protect the discloser, minimise risk of retaliation, and prevent disclosure of irrelevant personal information.

This may include: removing names, roles, or specific identifying details, using general descriptors (e.g. "a member", "a volunteer", "an official"), and limiting circulation to a restricted group on a strict need-to-know basis.

Where full anonymity cannot be safely maintained, Archery NZ will inform the discloser (where possible) before sharing information further.

Anonymous disclosures

Anonymous disclosures will be assessed and acted upon where reasonable and practicable. However, anonymity may limit Archery NZ's ability to seek clarification, investigate effectively, or provide updates.

If an anonymous discloser chooses to provide a contact method that preserves anonymity (e.g., private email address), Archery NZ will use this for confidential communication where possible. Where the identity of the discloser becomes apparent during an investigation, Archery NZ will continue to protect their confidentiality and apply all protections available under this policy and the Protected Disclosures (Protection of Whistleblowers) Act 2022.

Where natural justice requires sufficient detail to enable a response to allegations, this may indirectly reveal information about the discloser. Archery NZ will minimise this

risk wherever practicable but cannot guarantee complete anonymity in all circumstances.

7. Protection from Retaliation

Archery NZ strictly prohibits retaliation against any person who makes a protected disclosure in good faith.

This includes protection from:

- Dismissal, demotion, or disadvantage
- Harassment, bullying, or discrimination
- Threats or adverse treatment

Any retaliation may result in disciplinary action and may constitute a breach of law.

Protection under this policy also extends to any person who assists a discloser, or who is associated with a discloser, in connection with a protected disclosure.

8. Assessment and Investigation

Upon receipt of a protected disclosure, Archery NZ will follow a structured and fair process, which includes:

(a) Acknowledgement

Receipt of the disclosure will be acknowledged within 5 working days, unless the disclosure was made anonymously and no contact details were provided.

(b) Initial Assessment

An initial assessment will be undertaken within 10 working days to determine whether the disclosure meets the threshold of serious wrongdoing under this policy and the Protected Disclosures (Protection of Whistleblowers) Act 2022.

(c) Decision on Investigation

The discloser (where contact is possible) will be advised within 15 working days whether an investigation will proceed, and the reasons for that decision.

(d) Investigation

Investigations may be conducted internally or externally, depending on the nature and seriousness of the disclosure. Archery NZ will aim to complete investigations within 20–45 working days, subject to complexity and availability of information.

(e) Updates

Where investigations extend beyond 20 working days, Archery NZ will provide the discloser with periodic updates (approximately every 20 working days), where contact is possible.

(f) Outcome Communication

The outcome of the investigation will be communicated to the discloser as soon as practicable, subject to confidentiality, privacy, and natural justice requirements.

9. Natural Justice

Archery NZ is committed to principles of natural justice. Any person subject to allegations will be treated fairly and given an opportunity to respond, where appropriate and lawful.

10. Conflict of Interest, Recusal, and Escalation

Where a protected disclosure raises a conflict of interest or concerns the impartiality of decision-makers, the following applies:

- Where a disclosure concerns the Board Chair, the Chair will be fully recused from receiving, assessing, or managing the disclosure. The Deputy Chair, or another non-conflicted Board member, will assume responsibility.
- Where a disclosure concerns another Board member, that individual must be recused from all involvement in the matter. Remaining non-conflicted Board members will determine next steps.
- Where a disclosure concerns multiple Board members, the Board collectively, or otherwise creates a perceived or actual inability for the Board to act impartially, Archery NZ will refer the matter to an independent external investigator or an appropriate external authority under the Act.
- Where a primary designated recipient is unavailable, the disclosure may be made to another internal recipient named in this policy or directly to an appropriate external authority.

Archery NZ will document all recusal and escalation decisions to support transparency and good governance.

11. Support for the Discloser

Where appropriate, Archery NZ may:

- Provide information about support services
- Offer a point of contact for updates
- Take steps to reduce stress or risk to the discloser

12. False or Malicious Disclosures

Disclosures must be made honestly and in good faith. Knowingly false or malicious disclosures may result in disciplinary action.

13. Record Keeping

Archery NZ will maintain secure and confidential records of protected disclosures and actions taken, in accordance with privacy and legal requirements. An anonymised summary of disclosures, themes, and actions taken will be provided to the Board at least annually

14. Review and Awareness

This policy will be reviewed at least every three years, or earlier if required by law or Sport NZ guidance.

Archery NZ will promote awareness of this policy to Board members, staff, volunteers, and members.

Document version record

Version	Purpose/ Change	Author	Approved by	Date
1	Draft version	Frasier Cho	Unapproved draft, for feedback from OM Committee in January	21 January 2026
2	2nd Draft	Frasier Cho	On advice from Governance Expert Melissa Soh-Newstead	2 April 2026
3	Final version	Organisational Management Committee	Organisational Management Committee	29 April 2026