



## ALBERTA GOLF SAFE SPORT POLICIES

### INTRODUCTION

Alberta Golf has a fundamental obligation and responsibility to protect the health, safety, and physical and mental well-being of athletes, staff, volunteers, and other participants involved in its activities. As the Provincial Sport Organization for golf, Alberta Golf plays a leadership role in promoting this safe sport environment across the golf landscape in Alberta.

Alberta Golf takes any situation involving misconduct or maltreatment very seriously. For this reason, Alberta Golf is committed to enacting and enforcing strong, clear, and effective policies and processes for preventing and addressing all forms of misconduct or maltreatment.

These Safe Sport policies collectively promote an abuse-free sport environment by communicating expected standards of behaviour. These policies also enable consistent, immediate, appropriate, and meaningful action should any issues arise.

Should any individuals involved with Alberta Golf – including, but not limited to athletes, coaches, officials, employees, volunteers, and parents/guardians of athletes – wish to report any instance of misconduct or maltreatment, they may do so directly to Alberta Golf’s independent Case Manager as identified in this set of Policies. The Case Manager will then refer to this document to determine the appropriate forum and manner to address the report.

Alberta Golf also recognizes and complies with Version 2022 (6.0) of the **Universal Code of Conduct to Prevent and Address Maltreatment in Sport (UCCMS)**.

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## DEFINITIONS (*CONDUCT*)

*The terms defined below apply to all policies included in these Safe Sport Policies*

\* Indicates a definition adapted from the UCCMS

1. ***Abuse*** – Includes Psychological Maltreatment, Physical Maltreatment, Neglect, and/or Grooming of Vulnerable Participants by Persons in Authority and which can have the following warning signs:
  - a. Recurrent unexplained injuries
  - b. Alert behaviour; child seems to always be expecting something bad to happen
  - c. Often wears clothing that covers up their skin, even in warm weather
  - d. Child startles easily, shies away from touch or shows other skittish behaviour
  - e. Constantly seems fearful or anxious about doing something wrong
  - f. Withdrawn from peers and adults
  - g. Behavior fluctuates between extremes (e.g., extremely cooperative or extremely demanding)
  - h. Acting either inappropriately beyond their age (like an adult; taking care of other children) or inappropriately younger than their age (like an infant; throwing tantrums)
  - i. Acting out in an inappropriate sexual way with toys or objects
  - j. New adult words for body parts and no obvious source
  - k. Self-harm (e.g., cutting, burning or other harmful activities)
  - l. Not wanting to be alone with a particular child or young person
2. ***\*Consent*** – *Consent* is defined in Canada's *Criminal Code* as the voluntary agreement to engage in the sexual activity in question. The law focuses on what the person was actually thinking and feeling at the time of the sexual activity. Sexual touching is only lawful if the person affirmatively communicated their consent, whether through words or conduct. Silence or passivity does not equal consent. Sexual activity is only legal when both parties consent. The *Criminal Code* also says there is no consent when: Someone says or does something that shows they are not consenting to an activity; Someone says or does something to show they are not agreeing to continue an activity that has already started; Someone is incapable of consenting to the activity, because, for example, they are unconscious; The consent is a result of a someone abusing a position of trust, power or authority or someone consents on someone else's behalf. A person cannot say they mistakenly believed a person was consenting if: that belief is based on their own intoxication; they were reckless about whether the person was consenting; they chose to ignore things that would tell them there was a lack of consent; or they didn't take proper steps to check if there was consent. Sexual activity with a Minor is a criminal offence as is sexual activity with a person under the age of 18 years when the other person is in a position of trust or authority.
3. ***\*Disclosure*** - The sharing of information by a Participant regarding an incident or a pattern of Maltreatment experienced by that Participant. Disclosure does not constitute a formal report that initiates a process of investigation to address the Maltreatment.
4. ***Discrimination*** – Differential treatment of an individual based on one or more prohibited grounds which include race, citizenship, national or ethnic origin, colour, religion, age, sex, sexual orientation, gender identity or expression, marital status, family status, genetic characteristics, or disability.
5. ***\*Duty to Report***
  - a. **Concerns Under Child Protection Legislation:** A legal duty to report is mandated by law, and the requirement varies by province depending on provincial legislation. Everyone has a duty to report child abuse and neglect under Canadian child welfare laws. Professionals who work with children and youth have an added responsibility to report. Adults are obliged to report child Maltreatment if there is knowledge or suspicion that it is occurring. This is called the "duty to



report.” Every person in Canada has the duty to report known or suspected child Maltreatment by law. Known or suspected abuse or Neglect of a child must be reported to: local child welfare services (e.g., children’s aid society or child and family services agency), or provincial/territorial social service ministries or departments, or local police.

- b. **Concerns Outside of Child Protection Legislation:** Participants have a duty to report concerns of inappropriate conduct of other Participants to uphold the ethical standards and values of Canadian sport. Reporting inappropriate conduct is important to ensure proper action is taken and expectations are re-established. By addressing inappropriate conduct, a collective responsibility to protect Participants from Maltreatment is enacted.
6. **\*Grooming** – Deliberate conduct by a Participant to sexualize a relationship with a Minor that involves the gradual blurring of boundaries and normalization of inappropriate and sexually abusive behaviour. During the grooming process, the Participant will gain the trust of the Minor and protective adults and peers around the Minor often under the guise of an existing relationship. Manipulation tactics are then used to blur perceptions and gain further access to and private time with the Minor in order to abuse or exploit the Minor. Grooming can occur whether or not harm is intended or results from the behaviour. (Grooming is also a prohibited behaviour listed under the definition of Maltreatment).
7. **Harassment** – A course of vexatious comment or conduct against a Participant or group, which is known or ought reasonably to be known to be unwelcome. Types of behaviour that constitute Harassment include, but are not limited to:
- a. Written or verbal abuse, threats, or outbursts;
  - b. Persistent unwelcome remarks, jokes, comments, innuendo, or taunts;
  - c. Racial harassment, which is racial slurs, jokes, name calling, or insulting behaviour or terminology that reinforces stereotypes or discounts abilities because of racial or ethnic origin;
  - d. Leering or other suggestive or obscene gestures;
  - e. Condescending or patronizing behaviour which is intended to undermine self-esteem, diminish performance or adversely affect working conditions;
  - f. Practical jokes which endanger a person’s safety, or may negatively affect performance;
  - g. **Hazing**—which is any form of conduct which exhibits any potentially humiliating, degrading, abusive, or dangerous activity expected of a junior-ranking individual by a more senior individual, which does not contribute to either individual’s positive development, but is required to be accepted as part of a team or group, regardless of the junior-ranking individual’s willingness to participate. This includes, but is not limited to, any activity, no matter how traditional or seemingly benign, that sets apart or alienates any teammate or group member based on class, number of years on the team or with the group, or ability;
  - h. Unwanted physical contact including, but not limited to, touching, petting, pinching, or kissing;
  - i. Deliberately excluding or socially isolating a person from a group or team;
  - j. Persistent sexual flirtations, advances, requests, or invitations;
  - k. Physical or sexual assault;
  - l. Contributing to a harmful sport environment, which can include:
    - a. Locations where material that is discriminatory is displayed (e.g., sexually explicit posters and racial/racist cartoons)
    - b. Groups where harassing behaviour is part of the normal course of activities
    - c. Behaviour that causes embarrassment, awkwardness, endangers a person’s safety or negatively affects performance.
  - m. Behaviours such as those described above that are not directed towards a specific person or group but have the same effect of creating a negative or hostile environment; and Retaliation or threats of retaliation against a person who reports harassment to Alberta Golf.



8. **\*Maltreatment** – Includes Maltreatment related to:

- a. *Psychological Maltreatment* – which includes, without limitation, verbal acts, non-assaultive physical acts and acts that deny attention or support
- b. Verbal Acts - Verbally assaulting or attacking someone, including but not limited to: unwarranted personal criticisms; body shaming; derogatory comments related to one's identity (e.g. race, gender identity or expression, ethnicity, Indigenous status, ability/disability); comments that are demeaning, humiliating, belittling, intimidating, insulting or threatening; the use of rumours or false statements about someone to diminish that person's reputation; using confidential sport and non-sport information inappropriately. Verbal Maltreatment may also occur in online forms.
- c. Non-assaultive Physical Acts (no physical contact) - Physically aggressive behaviors, including but not limited to: throwing objects at or in the presence of others without striking another; hitting, striking or punching objects in the presence of others.
- d. Acts that Deny Attention or Support - Acts of commission that deny attention, lack of support or isolation including but not limited to: ignoring psychological needs or socially isolating a person repeatedly or for an extended period of time; abandonment of an Athlete as punishment for poor performance; arbitrarily or unreasonably denying feedback, training opportunities, support or attention for extended periods of time and/or asking others to do the same.
- e. *Physical Maltreatment* – includes, without limitation, contact or non-contact behaviours that have the potential to cause physical harm.
  - a. Contact behaviours - Including but not limited to: deliberately punching, kicking, beating, biting, striking, strangling or slapping another; deliberately hitting another with objects
  - b. Non-contact behaviours - Including but not limited to: isolating a person in a confined space; forcing a person to assume a painful stance or position for no athletic purpose (e.g., requiring an Athlete to kneel on a hard surface); the use of exercise for the purposes of punishment; withholding, recommending against, or denying adequate hydration, nutrition, medical attention or sleep; denying access to a toilet; providing alcohol to a Participant under the legal drinking age; providing illegal drugs or non-prescribed medications to a Participant; encouraging or knowingly permitting an Athlete to return to play prematurely following any injury or after a concussion and without the clearance of a medical professional; encouraging an Athlete to perform a skill for which they are known to not be developmentally ready
- f. *Sexual Maltreatment* – includes, without limitation, any act targeting a person's sexuality, gender identity or expression, that is committed, threatened or attempted against a person, and includes but is not limited to the Criminal Code Offences of sexual assault, sexual exploitation, sexual interference, invitation to sexual touching, indecent exposure, voyeurism and non-consensual distribution of sexual/intimate images. Sexual Maltreatment also includes sexual harassment and stalking, cyber harassment, and cyber stalking of a sexual nature. Examples include:
  - a. Any penetration of any part of a person's body, however slight, with any object or body part by a person upon another person, including but not limited to:
    - i. vaginal penetration by a penis, object, tongue, or finger; and
    - ii. anal penetration by a penis, object, tongue, or finger
  - b. Any intentional touching of a sexual nature of any part of a person's body, however slight, with any object or body part by a person upon another person, including but not limited to:
    - i. kissing;
    - ii. intentional touching of the breasts, buttocks, groin or genitals, whether clothed or unclothed, or intentionally touching of another with any of these body parts;
    - iii. any contact, no matter how slight, between the mouth of one person and the genitalia of another person, and



- iv. making another touch themselves, the Participant, or someone else with or on any of the body parts listed in b).
    - v. any intentional touching in a sexualized manner of the relationship, context or situation
  - c. In addition to the criminal acts identified above, the UCCMS prohibits sexual relations between an Athlete above the age of majority (depending upon jurisdiction) and a Participant who holds a position of trust and authority on the basis that there can be no Consent where there is a Power Imbalance. A Power Imbalance that is presumed to exist may be challenged.
- g. *Neglect* – or acts of omission, includes without limitation: not providing an Athlete recovery time and/or treatment for a sport injury; not being aware of and not considering an individual’s physical or intellectual disability; not considering supervision of an Athlete during travel, training or competition; not considering the welfare of the Athlete when prescribing dieting or other weight control methods (e.g., weigh-ins, caliper tests); disregarding the use of performance-enhancing drugs by an Athlete; failure to ensure safety of equipment or environment; allowing an Athlete to disregard sport’s rules, regulations, and standards, subjecting Participants to the risk of Maltreatment.
- h. *Grooming* – is often a slow, gradual and escalating process of building trust and comfort with a young person. Grooming includes, without limitation, the process of making inappropriate behaviour seem normal and gradually engaging in ‘boundary violations’ which have been professionally-identified to Canadian standards (e.g., a degrading remark, a sexual joke, sexualized physical contact; adult Participants sharing rooms with a Minor who is not an immediate family member; providing a massage or other purported therapeutic interventions with no specific training or expertise; private social media and text communications; sharing personal photographs; shared use of locker rooms; private meetings; private travel, and providing gifts. The Grooming process:
  - a. Grooming usually begins with subtle behaviours that do not appear to be inappropriate. Many victims/survivors of sexual abuse do not recognize the grooming process as it is happening, nor do they recognize that this process of manipulation is part of the overall abuse process.
  - b. In the grooming process, the offender begins by gaining trust of adults around the young person. The offender establishes a friendship and gains the young person’s trust. Grooming then involves testing boundaries (e.g. telling sexual jokes, showing sexually explicit images, making sexual remarks). Typically, behaviour moves from non-sexual touching to “accidental” sexual touching.
  - c. The young person is often manipulated into feeling responsible for the contact, is discouraged from telling anyone else about the relationship, and is made to feel obligated to protect the offender. The offender also builds trust with those close to the young person so that the relationship with the young person is not questioned.
- i. *Interference with or Manipulation of Process* – it is considered maltreatment if an adult Participant directly or indirectly interferes with a process by:
  - a. falsifying, distorting, or misrepresenting information, the resolution process, or an outcome;
  - b. destroying or concealing information;
  - c. attempting to discourage an individual’s proper participation in or use of the processes of Alberta Golf;
  - d. harassing or intimidating (verbally or physically) any person involved in the processes before, during, and/or following any proceedings of Alberta Golf; publicly disclosing a Participant’s identifying information, without the Participant’s agreement;



- e. failing to comply with any temporary or provisional measure or other final sanction;
  - f. distributing or otherwise publicizing materials a Participant gains access to during an investigation or hearing, except as required by law or as expressly permitted; or
  - g. influencing or attempting to influence another person to interfere with or manipulate the process.
- j. *Retaliation*—which means that a Participant shall not take an adverse action against any person for making a good faith Report of possible Maltreatment or for participating in any process related to alleged conduct violations. Retaliation includes threatening, intimidating, harassing, coercing or any other conduct that would discourage a reasonable person from engaging or participating in the processes of Alberta Golf. Retaliation after the conclusion of investigation and sanction processes is also prohibited. Retaliation may be present even where there is a finding that no Maltreatment occurred. Retaliation does not include good-faith actions lawfully pursued in response to a Report of possible Maltreatment.
- a. Aiding and Abetting – which is any act taken with the purpose of facilitating, promoting, or encouraging the commission of Maltreatment by a Participant. Aiding and Abetting also includes, without limitation, knowingly:
    - i. allowing any person who has been suspended or is otherwise ineligible to be in any way associated with sport or to coach or instruct Participants;
    - ii. providing any coaching-related advice or service to an Athlete who has been suspended or is otherwise ineligible; and
    - iii. allowing any person to violate the terms of their suspension or any other sanctions imposed.
- k. *Reporting* – it is considered Maltreatment to fail to report Maltreatment of a Minor. A legal Duty to Report is mandated by law, and the requirement varies by province depending on provincial legislation.
- a. Failure to Report Maltreatment of a Minor
    - i. The obligation to Report requires the Reporting of any conduct which, if proven true, would constitute Psychological Maltreatment, Sexual Maltreatment, Physical Maltreatment or Neglect involving a Minor Participant. The obligation to Report is an ongoing one and is not satisfied simply by making an initial Report. The obligation includes Reporting, on a timely basis, all relevant information of which an adult Participant becomes aware.
    - ii. The obligation to Report includes making a direct Report.
    - iii. The obligation to Report includes personally identifying information of a potential Minor Complainant to the extent known at the time of the Report, as well as a duty to reasonably supplement the Report as to identifying information learned at a later time.
    - iv. Participants should not investigate or attempt to evaluate the credibility or validity of allegations involving Psychological Maltreatment, Sexual Maltreatment, Physical Maltreatment or Neglect. Participants making a good faith Report are not required to prove the Reports are true before Reporting.
  - b. Failure to Report Inappropriate Conduct
    - i. Not all inappropriate conduct may meet the threshold for constituting Maltreatment. However, such inappropriate conduct may represent behavior with the risk of escalating to Maltreatment. Any Participant who suspects or becomes aware of another Participant's inappropriate conduct, even if it is not defined as Maltreatment, has a Duty to Report such inappropriate conduct through the organization's internal procedures. Those in positions of trust and authority who become aware of another's inappropriate conduct have a responsibility for reporting the concern within their organization's policies and procedures. The



person making the report does not need to determine whether a violation took place: instead, the responsibility lies in reporting the objective behaviour.

- c. Intentionally Filing a False Allegation
  - i. An allegation is false if the events Reported did not occur, and the person making the Report knows the events did not occur.
  - ii. A false allegation is different from an unsubstantiated allegation; an unsubstantiated allegation means there is insufficient supporting evidence to determine whether an allegation is true or false. Absent demonstrable bad faith, an unsubstantiated allegation alone is not grounds for a violation.
- 9. ***\*Neglect*** – Any pattern or a single serious incident of lack of reasonable care, inattention to a Participant’s needs, nurturing or well-being, or omissions in care. Neglect is determined by the objective behaviour but the behaviour must be evaluated with consideration given to the Participant’s needs and requirements, not whether harm is intended or results from the behaviour. (Neglect is also a prohibited behaviour listed under the definition of Maltreatment)
- 10. ***\*Physical Maltreatment*** – Any pattern or a single serious incident of deliberate conduct that has the potential to be harmful to the physical well-being of the Participant. Physical Maltreatment includes, without limitation, contact or non-contact infliction of physical harm. Physical Maltreatment is determined by the objective behaviour, not whether harm is intended or results from the behaviour. (Physical Maltreatment is also a prohibited behaviour listed under the definition of Maltreatment)
- 11. ***\*Power Imbalance*** – A Power Imbalance may exist where, based on the totality of the circumstances, a Participant has supervisory, evaluative, a duty of care, or other authority over another Participant. A Power Imbalance may also exist between an Athlete and other adults involved in sport in positions such as high-performance directors, sport specific health-care providers, sport science support staff, care or support persons, guides or pilots. Maltreatment occurs when this power is misused. Once a coach-Athlete relationship is established, a Power Imbalance is presumed to exist throughout the coach-Athlete relationship, regardless of age, and is presumed to continue for Minor Athletes after the coach-Athlete relationship terminates or until the Athlete reaches 25 years of age. A Power Imbalance may exist, but is not presumed, where an intimate relationship existed before the sport relationship commenced (e.g., a relationship between two spouses or life partners, or a sexual relationship between consenting adults that preceded the sport relationship).
- 12. ***\*Psychological Maltreatment*** – Any pattern or a single serious incident of deliberate conduct that has the potential to be harmful to the psychological well-being of the Participant. Psychological Maltreatment includes, without limitation, verbal conduct, non-assaultive physical conduct, and conduct that denies attention or support. Psychological Maltreatment is determined by the objective behaviour, not whether harm is intended or results from the behaviour. (Psychological Maltreatment is also a prohibited behaviour listed under the definition of Maltreatment)
- 13. ***\*Sexual Maltreatment***
  - a. **Involving a Child:** Any form of adult/child sexualized interaction constitutes child sexual abuse. Sexual abuse of a child may occur through behaviours that do or do not involve actual physical contact. (Sexual Maltreatment is also a prohibited behaviour listed under the definition of Maltreatment)
  - b. **Involving a person over the Age of Majority:** Any sexual act, whether physical or psychological in nature, that is committed, threatened, or attempted against a Participant without the Participant’s Consent. It includes any act targeting a Participant’s sexuality, gender identity or expression, that is committed, threatened or attempted against a Participant without that Participant’s Consent,





and includes but is not limited to, the Criminal Code Offences of sexual assault, sexual exploitation, sexual interference, invitation to sexual touching, indecent exposure, voyeurism and non-consensual distribution of sexual/intimate images. Sexual Maltreatment also includes sexual harassment and stalking, cyber harassment, and cyber stalking of a sexual nature. Sexual Maltreatment can take place through any form or means of communication (e.g. online, social media, verbal, written, visual, hazing, or through a third party). (Sexual Maltreatment is also a prohibited behaviour listed under the definition of Maltreatment)

**14. *Workplace Harassment*** – Vexatious comment or conduct against a worker in a Workplace that is known or ought reasonably to be known to be unwelcome. Workplace Harassment should not be confused with legitimate, reasonable management actions that are part of the normal work/training function, including measures to correct performance deficiencies, such as placing someone on a performance improvement plan, or imposing discipline for workplace infractions. Types of behaviour that constitute Workplace Harassment include, but are not limited to:

- a. Bullying;
- b. Workplace pranks, vandalism, bullying or hazing;
- c. Repeated offensive or intimidating phone calls or emails;
- d. Inappropriate sexual touching, advances, suggestions or requests;
- e. Displaying or circulating offensive pictures, photographs or materials in printed or electronic form;
- f. Psychological abuse;
- g. Excluding or ignoring someone, including persistent exclusion of a person from work-related social gatherings;
- h. Deliberately withholding information that would enable a person to do his or her job, perform or train;
- i. Sabotaging someone else's work or performance;
- j. Gossiping or spreading malicious rumours;
- k. Intimidating words or conduct (offensive jokes or innuendos); and
- l. Words or actions which are known, or ought reasonably to be known, as offensive, embarrassing, humiliating, or demeaning.

**15. *Workplace Violence*** – The use of or threat of physical force by a person against a worker in a Workplace that causes or could cause physical injury to the worker; an attempt to exercise physical force against a worker in a Workplace that could cause physical injury to the worker; or a statement or behaviour that it is reasonable for a worker to interpret as a threat to exercise physical force against the worker in a Workplace that could cause physical injury to the worker. Types of behaviour that constitute Workplace Violence include, but are not limited to:

- a. Verbal or written threats to attack;
- b. Sending to or leaving threatening notes or emails;
- c. Physically threatening behaviour such as shaking a fist at someone, finger pointing, destroying property, or throwing objects;
- d. Wielding a weapon in a Workplace;
- e. Hitting, pinching or unwanted touching which is not accidental;
- f. Dangerous or threatening horseplay;
- g. Physical restraint or confinement;
- h. Blatant or intentional disregard for the safety or wellbeing of others;
- i. Blocking normal movement or physical interference, with or without the use of equipment;
- j. Sexual assault; and
- k. Any attempt to engage in the type of conduct outlined above



## DEFINITIONS (*POLICY*)

*The terms defined below apply to all policies included in these Safe Sport Policies*

\* Indicates a definition adapted from the UCCMS

1. ***Affected Party***— Any individual or entity, as determined by the Appeal Manager, who may be affected by a decision rendered under the *Appeal Policy* and who may have recourse to an appeal in their own right.
2. ***Alternate Liaison***— An individual appointed under the Whistleblower Policy in the event the Compliance Officer is unable to act in an unbiased or discrete manner due to their role with the organization and/or the content of the Report.
3. ***Appellant***— The Party appealing a decision.
4. ***Appeal Manager***— An individual, who may be any staff member, committee member, volunteer, Director, or an independent third party, who is appointed to oversee the *Appeal Policy*. The Appeal Manager will have responsibilities that include using decision making authority empowered by the *Appeal Policy*.
5. ***\*Athlete***— An individual who is an Athlete Participant in Alberta Golf who is subject to the UCCMS and the policies of Alberta Golf.
6. ***Board***— The Board of Directors of Alberta Golf.
7. ***Case Manager***— An independent individual (or individuals) appointed by Alberta Golf, who may or may not be the Ethics Commissioner (or designate) to receive and administer complaints under the *Discipline and Complaints Policy*.
8. ***Committee Member***— an individual elected or appointed to a committee or council of Alberta Golf.
9. ***\*Complainant***— A Participant or observer who makes a report of an incident, or a suspected incident, of Maltreatment or other behaviour that is a violation of the standards described in the *Code of Conduct and Ethics*.
10. ***Compliance Officer***— an individual appointed to receive Reports under the Whistleblower Policy
11. ***Days***— Days including weekends and holidays.
12. ***Director***— An individual appointed or elected to the Board of Directors of Alberta Golf.
13. ***Discipline Chair***— an individual appointed to handle the duties of the Discipline Chair as described in the *Discipline and Complaints Policy*.
14. ***Event***— An event conducted by Alberta Golf.
15. ***\*Minor***— Any Participant who is under the age of majority at the time and in the jurisdiction where the alleged Maltreatment has occurred. Adults are responsible for knowing the age of a minor. For the purpose of protection in each Canadian province and territory, a Minor is a child younger than 18 years old in Alberta.



16. **\*Participants** – Refers to all categories of individual members and/or registrants defined in the By-laws of Alberta Golf who are subject to the UCCMS and the policies of Alberta Golf, as well as all people employed by, contracted by, or engaged in activities with Alberta Golf including, but not limited to, employees, contractors, Athletes, coaches, instructors, officials, volunteers, managers, administrators, committee members, parents or guardians, spectators, committee members, and Directors and Officers.
17. **Parties** – the groups involved with a dispute. In the *Discipline and Complaints Policy*, the Parties are the Complainant and Respondent. In the *Appeal Policy*, the Parties are the Appellant, Respondent, and any Affected Party.
18. **Person in Authority** – Any Participant who holds a position of authority within Alberta Golf including, but not limited to, coaches, instructors, officials, managers, support personnel, chaperones, committee members, and Directors and Officers.
19. **\*Reporting (or Report)** – The provision of information in writing by any person or a Participant to a relevant independent authority (the independent person or position, such as a Case Manager, charged with receiving a report and determining next steps) regarding Maltreatment. Reporting may occur through either: (i) the Complainant (of any age) or the one who experienced the Maltreatment, or (ii) a witness – someone who witnessed the Maltreatment or otherwise knows or suspects Maltreatment. In either case, the intention of Reporting is to initiate an independent investigative process, which could result in disciplinary action being taken against the Respondent. This also refers to the provision of information in writing by any Worker against another Worker under the Whistleblower Policy.
20. **\*Respondent** – The Participant responding to a complaint or, in the case of an appeal, the body whose decision is being appealed.
21. **Social Media** – The catch-all term that is applied broadly to new computer-mediated communication media such as blogs, YouTube, Facebook, Instagram, Tumblr, TikTok, Snapchat, and Twitter.
22. **Vulnerable Participants** – Includes Minors and vulnerable adults (people who, because of age, disability or other circumstance, are in a position of dependence on others or are otherwise at a greater risk than the general population of being harmed by people in positions of trust or authority);
23. **Worker** – Any person who performs work for Alberta Golf including employees, managers, supervisors, temporary workers, volunteers, student volunteers, part-time workers, the Board of Directors, and independent contractors.
24. **Workplace** – Any place where business or work-related activities are conducted. Workplaces include but are not limited to, the registered office(s), work-related social functions, work assignments outside the registered office(s), work-related travel, the training and competition environment, and work-related conferences or training sessions.



## ALBERTA GOLF'S COMMITMENT TO SAFE SPORT

\* Indicates a section that has been adapted from the UCCMS

### Purpose

1. This section of the Safe Sport document describes the commitment of Alberta Golf to providing an abuse-free sport environment and adhering to the Universal Code of Conduct to Prevent and Address Maltreatment in Sport (UCCMS).

### Commitment to a Sport Environment Free from Maltreatment

\*Alberta Golf makes the following commitments to a sport environment free from Maltreatment:

2. All Participants in sport can expect to play, practice and compete, work, and interact in an environment free from Maltreatment.
3. Addressing the causes and consequences of Maltreatment is a collective responsibility and requires the deliberate efforts of all Participants, sport stakeholders, sport club administrators and organization leaders.
4. Participants in positions of trust and authority have the general responsibility to protect the health and well-being of all other Participants.
5. Adult Participants have a specific ethical and statutory duty and the additional responsibility to respond to incidents of Maltreatment involving Minors and other Vulnerable Individuals.
6. All Participants recognize that Maltreatment can occur regardless of age, sex, sexual orientation, gender identity or expression, race, ethnicity, Indigenous status, or level of physical and intellectual disability and their intersections. Moreover, it is recognized that those from traditionally marginalized groups have increased vulnerability to experiences of Maltreatment.
7. All Participants recognize that individuals who have experienced Maltreatment may experience a range of effects that may emerge at different time points and that can profoundly affect their lives.
8. All adults working with children and youth have a duty to prevent or mitigate opportunities for misconduct.
9. In recognition of the historic vulnerability to discrimination and violence amongst some groups, and that continues to persist today, Participants in positions of trust and authority have a duty to incorporate strategies to recognize systemic bias, unconscious bias, and to respond quickly and effectively to discriminatory practices.

### Conduct Standards

\* Alberta Golf has adopted a *Code of Conduct and Ethics* that describes standards of conduct and behaviour for all Participants. General standards of conduct apply to all Participants and specific standards apply to positions within the organization. The *Code of Conduct and Ethics* indicates that Alberta Golf adopts and adheres to the Canadian Anti-Doping Program.

### Social Media

\* Alberta Golf has adopted a *Social Media Policy* that describes standards of conduct that are expected on social media by Participants. The *Social Media Policy* highlights the importance of responsible coach-athlete interaction on social media.



## Athlete Protection

### Screening

\* Alberta Golf has adopted a comprehensive *Screening Policy* that requires some Participants to pass a screening process before being permitted to interact with athletes.

\* Alberta Golf has developed an *Athlete Protection Policy* that can be used by coaches, managers, medical personnel, and other Persons in Authority. Alberta Golf provides training on the policy and has taken steps to ensure the policy is being implemented.

### Resources

\* Alberta Golf will regularly provide information to Participants about resources and training related to athlete protection.

### Athlete Engagement

\* Alberta Golf will engage with athletes to determine the level of success of their athlete protection measures as well as to identify any gaps or athlete concerns.

## Dispute Resolution

\* Alberta Golf has developed a comprehensive suite of dispute resolution policies that include:

1. *Discipline and Complaints Policy*
2. *Appeal Policy*
3. *Dispute Resolution Policy*
4. *Event Discipline Procedure*
5. *Whistleblower Policy*

Taken together, the suite of dispute resolution policies includes the following features:

- a. An independent individual to whom complaints can be submitted.
- b. Sanctions for violations of conduct standards.
- c. Mechanism for suspension of individuals pending the conclusion of the process.
- d. Non-biased and experienced case managers, decision-makers and/or investigators.
- e. Protection from reprisal for submitting complaints.
- f. Anonymity for the complainant in cases of whistleblowers, to the maximum extent possible.
- g. Independence of appeal procedures, when appeals are permitted.
- h. Opportunity for alternative dispute resolution.
- i. Investigations of complaints as circumstances merit.
- j. In-event discipline procedures (when an event does not have its own disciplinary procedures).

### Alignment

- Alberta Golf recognizes the importance of safe sport for athletes and participants across the country. Golf Canada has developed a *Reciprocation Policy* that:
  1. Requests Alberta Golf and Member Clubs to report discipline decisions to Golf Canada.
  2. Requires Golf Canada to distribute discipline decisions to Alberta Golf and to applicable Member Clubs.
  3. Requests Golf Canada, Alberta Golf and Member Clubs to recognize and strongly recommend enforcing sanctions imposed by Golf Canada, Alberta Golf, or a Member Club.
  4. Requests recognition and enforcement of sanctions imposed by Golf Canada.

### Obligations – Reporting and Third-Party Case Management

- The policies of Alberta Golf include requirements that certain complaints must be reported to government entities, local police forces, and/or child protection agencies.
- The policies of Alberta Golf include requirements that complaints must be received by an independent third party that has no conflict of interest or bias.



#### *Records*

- Alberta Golf will retain records of decisions that have been made pursuant to the organization's policies for ten (10) years. These records may be shared with other individuals or organizations, including but not limited to, national sport organizations, provincial/territorial sport organizations, multi-sport organizations, and government entities.

#### **Governance and Operations**

- Alberta Golf will have a comprehensive plan in which athlete protection and safe sport are top priorities for the organization.
- Alberta Golf maintains a *Risk Management Registry* that describes how the organization identifies risks and categorizes them based on the product of likelihood and impact. Alberta Golf will contemplate risk management strategies that retain, reduce, transfer, and/or avoid the risk. Risks can occur in the following areas:
  - a. Operational/Program
  - b. Compliance
  - c. Communication
  - d. External
  - e. Governance
  - f. Financial
  - g. Health and Safety
- Alberta Golf continues to develop a governance structure and organizational culture that reflects the diversity of the athletes and stakeholders within the sport, that adheres to all applicable federal and/or provincial/territorial legislation, and that moves toward a national alignment strategy for the sport in Canada.
- Alberta Golf continually monitors and evaluates its policies, practices, and procedures.



# CODE OF CONDUCT AND ETHICS

\* Indicates a section that has been adapted from the UCCMS

## Purpose

1. The purpose of this Code is to ensure a safe and positive environment within the programs, activities, and events of Alberta Golf by making Participants aware that there is an expectation, at all times, of appropriate behaviour consistent with Alberta Golf's core values and policies. Alberta Golf supports equal opportunity, prohibits discriminatory practices, and is committed to providing an environment in which all individuals can safely participate in sport and are treated with respect and fairness.

## Application of this Code

2. This Code applies to any Participant's conduct during the business, activities, and events of Alberta Golf including, but not limited to competitions, practices, evaluations, treatment or consultations (e.g., massage therapy), training sessions, travel associated with organizational activities, the office environment, and any meetings.
3. This Code also applies to Participants' conduct outside of the business, activities, and events of Alberta Golf when such conduct adversely affects the organization's relationships (and the work and sport environment) or is detrimental to the image and reputation of Alberta Golf. Such applicability will be determined by Alberta Golf at its sole discretion.
4. \*This Code applies to Participants active in the sport or who have retired from the sport where any claim regarding a potential breach of this Code occurred when the Participant was active in the sport.
5. In addition, breaches of this Code may occur when the Participants involved interacted due to their mutual involvement in the sport or, if the breach occurred outside of the sport environment, if the breach has a serious and detrimental impact on the Participant(s).
6. Any Participant who violates this Code may be subject to sanctions pursuant to the *Discipline and Complaints Policy*. In addition to facing possible sanctions pursuant to the *Discipline and Complaints Policy*, a Participant who violates this Code during a competition may be removed from the competition or training area, and the Participant may be subject to further sanctions.

## Persons in Authority and Maltreatment

7. \*When they are a Person in Authority, Participants are responsible for knowing what constitutes Maltreatment. The categories of Maltreatment are not mutually exclusive, nor are the examples provided in each category an exhaustive list. Rather, what matters for the assessment of the Maltreatment is whether the conduct falls into one or more of the categories, not into which category it falls. Abuse, assault, Harassment, bullying, and hazing can be experienced in more than one category of Maltreatment.
8. \*Maltreatment can be any of the prohibited behaviours and conduct, provided the Maltreatment occurs in any one or a combination of the following situations. The physical location(s) where the alleged Maltreatment occurred is not determinative.
  - a. Within a sport environment;
  - b. When the Participant alleged to have committed Maltreatment was engaging in sport activities;
  - c. When the Participants involved interacted due to their mutual involvement in sport; or
  - d. Outside of the sport environment where the Maltreatment has a serious and detrimental impact on another Participant.



9. \*It is a violation of the Code for sport administrators or other Persons in Authority to place Participants in situations that make them vulnerable to Maltreatment. This includes, but is not limited to, instructing an Athlete and coach to share a hotel room when traveling, hiring a coach who has a history of Maltreatment, assigning guides and other support staff to a para-Athlete when the guide or support staff has a reputation for Maltreatment or assigning such a guide or support staff to a para-Athlete in the absence of consultation with the para-Athlete.

## Responsibilities

10. Participants have a responsibility to:
- a. \*Refrain from any behaviour that constitutes Maltreatment, Discrimination, Harassment, Workplace Harassment, or Workplace Violence.
  - b. Maintain and enhance the dignity and self-esteem of other Participants by:
    - i. Treating each other with the highest standards of fairness, honesty, respect and integrity;
    - ii. Focusing comments or criticism appropriately and avoiding public criticism of Athletes, coaches, officials, organizers, volunteers, employees, or other Participants;
    - iii. Consistently demonstrating the spirit of sportsmanship, sport leadership, and ethical conduct;
    - iv. Acting, when appropriate, to correct or prevent practices that are unjustly discriminatory; and
    - v. Ensuring adherence to the rules of the sport and the spirit of those rules.
  - c. Abstain from the non-medical use of medications or drugs or the use of Prohibited Substances or Prohibited Methods as listed on the version of the World Anti-Doping Agency's Prohibited List currently in force. More specifically, Alberta Golf adopts and adheres to the Canadian Anti-Doping Program (Anti-Doping Notice to Players). Alberta Golf will respect any sanction imposed on a Participant as a result of a breach of the Canadian Anti-Doping Program or any other applicable Anti-Doping Rules.
  - d. Refrain from associating with any person for the purpose of coaching, training, competition, instruction, administration, management, athletic development, or supervision, who has been found to have committed an anti-doping rule violation and is serving a period of ineligibility imposed pursuant to the Canadian Anti-Doping Program or any other applicable Anti-Doping Rules.
  - e. Refrain from the use of power or authority in an attempt to coerce another person to engage in inappropriate activities.
  - f. Refrain from consuming tobacco products, cannabis, or recreational drugs while participating in the programs, activities, competitions, or events of Alberta Golf.
  - g. In the case of Minors, not consume alcohol, tobacco, or cannabis at any competition or event.
  - h. In the case of adults, not consume cannabis in the Workplace or in any situation associated with the events of Alberta Golf (subject to any requirements for accommodation), not consume alcohol during training, competitions, or in situations where Minors are present, or in the workplace and take reasonable steps to manage the responsible consumption of alcohol in adult-oriented social situations.
  - i. When driving a vehicle:
    - i. Have a valid driver's license;
    - ii. Not be under the influence of alcohol or illegal drugs or substances;
    - iii. Have valid car insurance; and
    - iv. Refrain from holding a mobile device.
  - j. Respect the property of others and not wilfully cause damage.
  - k. Promote sport in the most constructive and positive manner possible.
  - l. Refrain from engaging in deliberate cheating which is intended to manipulate the outcome of a para-classification, competition and/or not offer or receive any bribe which is intended to manipulate the outcome of a competition.
  - m. Adhere to all federal, provincial/territorial, municipal and host country laws.





- n. Comply, at all times, with the bylaws, policies, procedures, and rules and regulations of Alberta Golf as adopted and amended from time to time.
- o. Report any ongoing criminal or anti-doping investigation, conviction, or existing bail conditions involving a Participant to Alberta Golf including, but not limited to, those for violence, child pornography, or possession, use, or sale of any illegal or prohibited substance or method.
- p. Comply with the *Alberta Golf Code of Conduct for Players*.
- q. Comply with *Alberta Golf Dress Code Policy*.

#### **Directors, Committee and Council Members, and Staff**

- 11. In addition to section 7 (above), Directors, Committee Members, and staff of Alberta Golf will have additional responsibilities to:
  - a. Function as a Director, Committee Member or staff member of Alberta Golf in a manner that is free of conflicts of interest involving other organizations or constituencies.
  - b. Conduct themselves professionally, lawfully and in good faith.
  - c. Ensure that financial affairs are conducted in a responsible and transparent manner with due regard for all fiduciary responsibilities
  - d. Not accept or seek, on behalf of themselves or any other person, any significant service, benefit, or gift from anybody offered as a result of them carrying out their duties for Alberta Golf. In the event they are offered a service, benefit, or gift having a value in excess of \$200, they shall first review the matter with the CEO of Alberta Golf for approval to accept. If acceptance is approved, then they must complete a declaration statement and submit the form to Human Resources.
  - e. Comply with Alberta Golf's *Conflict of Interest Policy*.
  - f. Comply with the *Screening Policy*.
  - g. Comply with the *Impairment in the Workplace Policy*.
  - h. Comply with the Privacy Policy
  - i. No political contributions (cash or non-cash) will be made by them on behalf of or in the name of Alberta Golf
  - j. Exercise the degree of care, diligence, and skill required in the performance of their duties pursuant to applicable laws.
  - k. Maintain confidentiality of private organizational information and not use confidential or propriety information for any other purpose other than Alberta Golf business.
  - l. Have a thorough knowledge and understanding of all policies and by-laws of Alberta Golf, all of which are posted on the Alberta Golf website. Without restricting the generality of the foregoing, specifically acknowledge that they have read and fully understand and agree that they are aware of the *Whistleblower Policy*.

#### **Coaches and Instructors**

- 12. In addition to section 7 (above), coaches and instructors have many additional responsibilities. The coach-Athlete relationship is a privileged one and plays a critical role in the personal, sport, and athletic development of the Athlete. Coaches must understand and respect the inherent power imbalance that exists in this relationship and must be extremely careful not to abuse it, either consciously or unconsciously. Coaches and instructors will:
  - a. \*Avoid any behaviour that abuses the Power Imbalance inherent in the coaching position to (i) establish or maintain a sexual relationship with an Athlete that he or she is coaching, or (ii) encourage inappropriate physical or emotional intimacy with an Athlete, regardless of the Athlete's age.
  - b. Not engage in a sexual or intimate relationship with an Athlete of any age in which the coach is in a position of trust or authority.
  - c. Disclose any sexual or intimate relationship with an Athlete over the age of majority to Alberta Golf. Immediately discontinue any coaching involvement with that Athlete.
  - d. Ensure a safe environment by selecting activities and establishing controls that are suitable for the age, experience, ability, and fitness level of the Athletes.



- e. Prepare Athletes systematically and progressively, using appropriate time frames and monitoring physical and psychological adjustments while refraining from using training methods or techniques that may harm Athletes.
- f. Avoid compromising the present and future health of Athletes by communicating and cooperating with sport medicine professionals in the diagnosis, treatment, and management of Athletes' medical and psychological treatments.
- g. Support the coaching staff of a training camp, provincial/territorial team, or national team, should an Athlete qualify for participation with one of these programs.
- h. Accept and promote Athletes' personal goals and refer Athletes to other coaches and sport specialists as appropriate.
- i. Provide Athletes (and the parents/guardians of Minor Athletes) with the information necessary to be involved in the decisions that affect the Athlete.
- j. Act in the best interest of the Athlete's development as a whole person.
- k. Comply with Alberta Golf's *Screening Policy*.
- l. Comply with Alberta Golf's *Impairment in the Workplace Policy*.
- m. Comply with Alberta Golf's *Privacy Policy*.
- n. Report any ongoing criminal or anti-doping investigation, conviction, or existing bail conditions to Alberta Golf, including those for violence, child pornography, or possession, use, or sale of any illegal or prohibited substance or method.
- o. Under no circumstances provide, promote, or condone the use of drugs (other than properly prescribed medications) or prohibited substances or prohibited methods and, in the case of Minors, alcohol, cannabis, and/or tobacco.
- p. Respect Athletes competing for other jurisdictions and, in dealings with them, not encroach upon topics or actions which are deemed to be within the realm of 'coaching', unless after first receiving approval from the coaches who are responsible for the Athletes.
- q. Recognize the power inherent in the position of coach and respect and promote the rights of all participants in sport. This is accomplished by establishing and following procedures for confidentiality (right to privacy), informed participation, and fair and reasonable treatment. Coaches have a special responsibility to respect and promote the rights of participants who are in a vulnerable or dependent position and less able to protect their own rights.
- r. Dress professionally and use appropriate language.

### Athletes

- 13. In addition to section 7 (above), Athletes will have additional responsibilities to:
  - a. Adhere to their Athlete Agreement with Alberta Golf (if applicable).
  - b. Report any medical problems in a timely fashion, when such problems may limit their ability to travel, practice, or compete.
  - c. Participate and appear on-time and prepared to participate to their best abilities in all competitions, practices, training sessions, and evaluations.
  - d. Adhere to rules that govern competition eligibility.
  - e. Adhere to rules and requirements regarding uniform and equipment.
  - f. Act in accordance with applicable policies and procedures and, when applicable, additional rules as outlined by coaches or managers.

### Officials

- 14. In addition to section 7 (above), officials will have additional responsibilities to:
  - a. Maintain and update their knowledge of the rules and rules changes.
  - b. Act openly, impartially, professionally, lawfully, and in good faith.
  - c. Refrain from publicly criticizing other officials.
  - d. Work within the boundaries of their position's description while supporting the work of other officials.



- e. Act as an ambassador of the sport by agreeing to enforce and abide by national and provincial/territorial rules and regulations.
- f. Take ownership of actions and decisions made while officiating.
- g. Respect the rights, dignity, and worth of all Participants.
- h. Be fair, equitable, considerate, independent, honest, and impartial in all dealings with others.
- i. Respect the confidentiality required by issues of a sensitive nature, which may include discipline processes, appeals, and specific information or data about Participants.
- j. Comply with Alberta Golf's *Screening Policy*.
- k. Comply with Alberta Golf's *Impairment in the Workplace Policy*.
- l. Honour all assignments unless unable to do so by virtue of illness or personal emergency, and in these cases inform a supervisor or Alberta Golf at the earliest possible time.
- m. When writing reports, set out the actual facts to the best of their knowledge and recollection.
- n. Dress in proper attire for officiating.

#### **Parents/Guardians and Spectators**

15. In addition to section 7 (above), parents/guardians and spectators at events will:
- a. Refrain from any harassment of competitors, coaches, officials, parents/guardians, or other spectators.
  - b. Comply with Alberta Golf's *Code of Conduct for Parents and Spectators*.
  - c. Respect the decisions and judgments of officials, and encourage Athletes to do the same.
  - d. Support all efforts to remove verbal and physical abuse, coercion, intimidation, and sarcasm from the sport environment.
  - e. Respect and show appreciation to all competitors, and to coaches, officials and other volunteers.
  - f. Encourage Athletes to compete within the rules and to resolve conflicts without resorting to hostility or violence.
  - g. Condemn the use of violence in any form.

#### **Member Clubs**

16. Member Clubs will be provided with a copy of Golf Canada's Safe Sport Policies and will be requested to:
- a. Adhere to relevant Golf Canada governing documents and policies and, where necessary, amend their own rules to comply or align with those of Golf Canada.
  - b. Ensure that all Athletes and coaches participating in sanctioned competitions and events of Golf Canada are registered and in good standing.
  - c. Appropriately screen prospective employees to help ensure Athletes have a healthy and safe sport environment.
  - d. Ensure that any reported misconduct is acted upon in accordance with Golf Canada's Safe Sport policies.
  - e. Impose appropriate disciplinary or corrective measures when misconduct has been substantiated.



## ATHLETE PROTECTION POLICY

### Purpose

This *Athlete Protection Policy* describes how Persons in Authority shall maintain an abuse-free sport environment for all Athletes.

### Interactions between Persons in Authority and Athletes – the ‘Rule of Two’

1. Alberta Golf requires that the ‘Rule of Two’ is followed for all Persons in Authority who interact with Athletes, to the maximum extent feasible. The ‘Rule of Two’ is a directive that says that an athlete must never be alone one-on-one with an unrelated Person in Authority.
2. Alberta Golf recognizes that abiding by the ‘Rule of Two’ may not be feasible in some instances, given the dynamics of golf participation and golf training.
3. Persons in Authority must comply with the ‘Rule of Two’ to the fullest extent feasible. Compliance with the ‘Rule of Two’ involves adhering to the following guidelines:
  - a. To the maximum extent possible, the training environment should be visible and accessible so that all interactions between Persons in Authority and Athletes are observable.
  - b. Private and one-on-one situations that are not observable by another adult or Athlete should be avoided to the maximum extent possible.
  - c. A Vulnerable Participant may not be alone under the supervision of a Person in Authority unless prior written permission is obtained from the Vulnerable Participant’s parent or guardian.
  - d. Persons in Authority may not invite or host Vulnerable Participants in their home without the written permission from parents or guardians or without parents or guardians having contemporaneous knowledge of the visit.
  - e. If a Person in Authority and an Athlete expect to be away from other Participants for a lengthy period of time (for example, they will be on the golf course together), they must inform another Person in Authority where they are going and when they are expected to return. Persons in Authority should always be reachable by phone or text message.

### Communications

4. For communication in any form between Persons in Authority and Athletes, following guidelines must be followed:
  - a. Persons in Authority may only send texts, direct messages on social media or emails to individual Athletes when necessary and only for communicating information related to team issues and activities (e.g., non-personal information).
  - b. Individual communication with an Athlete must remain professional in tone. Communication between Persons in Authority and Athletes that is personal in nature should be avoided. If such personal communication is unavoidable, it must be recorded and available for review by another Person in Authority and/or by the Athlete’s parent/guardian (i.e., if the Athlete is a Vulnerable Participant).
  - c. Parents/guardians may request that their child not be contacted by a Person in Authority using any form of electronic communication and/or may request that certain information about their child not be distributed in any form of electronic communications.
  - d. All communication between a Person in Authority and Athletes must be between the hours of 6:00am and midnight unless extenuating circumstances justify otherwise.
  - e. Communication concerning drugs or alcohol use is not permitted, unless the communication relates to policies prohibiting its use.
  - f. Communications may not include sexually explicit language, imagery, or content.



### Travel

5. For travel involving Persons in Authority and Athletes, adherence to the following guidelines is required:
  - a. Teams or groups of Athletes to travel with at least two Persons in Authority with them, to the extent that budget and logistical circumstances allow.
  - b. If two Persons in Authority cannot be present, reasonable efforts should be made to supplement supervision with screened parents or other volunteers.
  - c. To the maximum extent possible, a Person in Authority should not drive a vehicle alone with an Athlete unless the Person in Authority is the Athlete's parent or guardian.
  - d. A Person in Authority may not share a hotel room with an Athlete unless the Person in Authority is the Athlete's parent/guardian or spouse.
  - e. Room or bed checks during overnight stays must be done by two Persons in Authority.
  - f. For overnight travel when Athletes must share a hotel room, roommates must be age- appropriate (e.g., within approximately two years of age of one another) and of the same gender identity.

### Locker Rooms / Changing Areas

6. For locker rooms, changing areas, and other closed meeting spaces, adherence to the following guidelines is required:
  - a. Interactions between Persons in Authority and Athletes should not occur in any area where there is a reasonable expectation of privacy - such as a locker room, washroom or changing area. A second adult should be present for any necessary interaction between an adult and an Athlete in any such area.

### Photography / Video

7. For all photography and video of an Athlete, adherence to the following guidelines is required:
  - a. Photographs and video should be taken in public view. Content must observe generally accepted standards of decency, and be both appropriate for and in the best interest of the Athlete.
  - b. The use of recording devices in any areas where there is a reasonable expectation of privacy – such as locker rooms or washrooms - is strictly prohibited.
  - c. If content featuring an Athlete will be used on any form of public media, an Image Consent Form (Appendix A - Image Consent Form, Athlete Protection Policy) must be completed before the content is recorded.

### Physical Contact

8. Some physical contact between Persons in Authority and Athletes may be necessary for various reasons including, but not limited to, teaching a skill or tending to an injury. For physical contact, adherence to the following guidelines is required:
  - a. A Person in Authority must always request permission to make physical contact from the Athlete in advance and clearly explain where, why and how the physical contact will occur. The Person in Authority must make clear that they are requesting to touch the Athlete and not requiring physical contact.
  - b. Infrequent, incidental physical contact during a training session is not considered a violation of policy.
  - c. Non-essential physical contact may not be initiated by the Person of Authority. It is recognized that some Athletes may initiate non-essential physical contact such as hugging or other physical contact with a Person in Authority for various reasons (e.g., such as celebrating or crying after a poor performance). This physical contact should always occur in an open and observable environment.

### Enforcement

9. Any alleged violations of this *Athlete Protection Policy* shall be addressed pursuant to Alberta Golf's *Discipline and Complaints Policy*.



## DISCIPLINE AND COMPLAINTS POLICY AND PROCEDURE

\* Indicates a section that has been adapted from the UCCMS

### Purpose

1. Participants are expected to fulfill certain responsibilities and obligations including, but not limited to, complying with the policies, By-laws, rules and regulations of Alberta Golf. Non-compliance may result in the imposition of sanctions pursuant to this Policy.

### Application of this Policy

2. This Policy applies to all Participants.
3. This Policy applies to matters that may arise during the business, activities, and events of Alberta Golf including, but not limited to, competitions, practices and training, treatment or consultations (e.g., massage therapy), camps and clinics, travel associated with the activities of Alberta Golf, and any meetings.
4. This Policy also applies to Participants' conduct outside of the business, activities, and events of Alberta Golf when such conduct adversely affects the relationships (or the work and sport environment) of Alberta Golf, is detrimental to the image and reputation of Alberta Golf, or is in violation of Alberta Golf policy or conduct expectations.
5. \*This Policy applies to alleged breaches of the *Code of Conduct and Ethics* by Participants who have retired from the sport where any claim regarding a potential breach of the *Code of Conduct and Ethics* occurred when the Participant was active in the sport. In addition, this Policy will apply to breaches of the *Code of Conduct and Ethics* that occurred when the Participants involved interacted due to their mutual involvement in the sport or, if the breach occurred outside of the sport environment, if the breach has a serious and detrimental impact on the Participant(s).
6. The application of this Policy will be determined by Alberta Golf at its sole discretion and shall not be subject to appeal.
7. If it is considered appropriate or necessary based on the circumstances, immediate discipline or the imposition of a sanction may be applied, after which further discipline or sanctions may be applied according to this Policy. Any infractions or complaints occurring during a competition will be dealt with by the procedures specific to the competition, if applicable. In such situations, disciplinary sanctions may be for the duration of the competition, training, activity, or event only.
8. In addition to being subject to disciplinary action pursuant to this *Discipline and Complaints Policy*, an employee of Alberta Golf who is a Respondent to a complaint may also be subject to consequences in accordance with the employee's Employment Agreement or policies for human resources, if applicable.

### Minors

9. Complaints may be brought for or against a Participant who is a Minor. Minors must have a parent/guardian or other adult serve as their representative during this process.
10. Communication from the Case Manager, Discipline Chair or Discipline Panel (as applicable) must be directed to the Minor's representative.
11. A Minor is not required to attend an oral hearing, if held.



## Reporting a Complaint

12. Any person may report a complaint to Alberta Golf or to Golf Canada and Alberta Golf's Case Manager;

Case Manager: Ilan Yampolsky - 1 (800) 758-9412

Link: <https://app.integritycounts.ca/org/itpsport> (for reporting in both English and French)

13. At its discretion, Alberta Golf may act as the Complainant and initiate the complaint process under the terms of this Policy. In such cases, Alberta Golf will identify an individual to represent the organization.

## Discipline and Complaints Procedure

1. Complaints or incident reports should be made in writing for the discipline and complaints procedure to be initiated. The complainant may contact Alberta Golf's Case Manager for direction regarding the formal submission of a complaint. The Case Manager may accept any formal complaint at their sole discretion.
2. Upon receipt of a complaint, the Case Manager will proceed as follows:
  - a. Determine whether the complaint is within the jurisdiction of this Policy.
  - b. Determine whether the complaint is frivolous. If deemed frivolous, the complaint will be dismissed immediately and the Case Manager's decision to dismiss the complaint may not be appealed.
  - c. Propose the use of alternative dispute resolution techniques.
  - d. Determine if the complaint should be handled by Alberta Golf, Member Club, or Golf Canada. In making this decision, the Case Manager will consider:
    - a. The setting in which the alleged incident leading to the complaint occurred - i.e., whether within the business, activities, or events of Golf Canada, Alberta Golf, or a Member Club.
    - b. If the alleged incident leading to a complaint occurred outside of the business, activities, or events of any of these organizations, the Case Manager will determine jurisdiction by evaluating which organization's affairs are most impacted.
    - c. Whether the organization with jurisdiction may have a conflict of interest related to the complaint.
    - d. If the organization with jurisdiction has the capacity and resources to handle the complaint.
    - e. Determine if the complaint should be investigated pursuant to Appendix B – Investigation Procedure.
  - e. Choose which process (i.e., Process #1 or Process #2, as outlined below) should be followed to hear and adjudicate the complaint.

If the Case Manager determines that the complaint or incident should be handled by Alberta Golf or the Member Club, the Case Manager will notify Alberta Golf or the Member Club in question who shall appoint its own Case Manager to fulfil the responsibilities listed below. In such instance, any reference to Case Manager in this procedure shall be understood as a reference to Case Manager of Alberta Golf or the Member Club.

## Hearing and Adjudication Processes

3. There are two different processes that may be used to hear and adjudicate complaints. The Case Manager will decide which process should be followed based on the nature of the complaint.

In general, **Process #1** will be used for complaints related to the following:



- Disrespectful conduct
- Minor incidents of physical violence (e.g., tripping, pushing, elbowing)
- Conduct contrary to the values of Golf Canada, Alberta Golf or Member Club
- Non-compliance with the organization's policies, procedures, rules, or regulations
- Minor violations of the *Code of Conduct and Ethics*, *Social Media Policy*, or *Athlete Protection Policy*

In general, **Process #2** will be used for complaints related to the following:

- Racist, sexist, or discriminating comments or behaviour
- Repeated improper conduct or repeated disregard for bylaws, policies, rules, and regulations
- Hazing
- Harassment, sexual harassment, or sexual misconduct
- Major incidents of physical violence (e.g., fighting, attacking, sucker punching)
- Conduct that endangers the safety of others
- Conduct that intentionally interferes with a competition or with any athlete's preparation for a competition
- Conduct that intentionally disparages the organization's image, credibility, or reputation
- Major or repeated violations of the *Code of Conduct and Ethics*
- Intentionally damaging the organization's property
- Improperly handling the organization's finances
- Alcohol or drugs
- A conviction for any *Criminal Code* offense
- Any possession or use of banned performance enhancing drugs

#### **PROCESS #1: Handled by Discipline Chair**

4. Following the determination that the complaint or incident should be handled under Process #1, the Case Manager will appoint a Discipline Chair who may:
  - a. Recommend mediation;
  - b. Make a decision;
  - c. Ask the Complainant and the Respondent for either written or oral submissions regarding the complaint or incident; or
  - d. Convene the parties to a meeting, either in person or by way of video or teleconference in order to ask the parties questions.
5. Thereafter, the Discipline Chair shall determine if a breach occurred and if sanctions should be applied (see: **Sanctions**).
6. The Discipline Chair will inform the Parties of the decision, which will take effect immediately.
7. Records of all sanctions will be maintained by Golf Canada. Alberta Golf and Member Clubs will submit all records to Golf Canada.

#### **Request for Reconsideration**

8. If there is no sanction, the Complainant may contest the non-sanction by informing the Discipline Chair, within five (5) days of receiving the decision, that the Complainant is not satisfied with the decision. The initial complaint or incident will then be handled under Process #2 of this procedure.
9. If there is a sanction, the sanction may not be appealed until the completion of a Request for Reconsideration. However, the Respondent may contest the sanction by submitting a Request for Reconsideration within five (5) days of receiving the sanction. In the Request for Reconsideration, the Respondent must indicate:
  - a. Why the sanction is inappropriate;





- b. Summary of evidence to support the Respondent's position; and
  - c. What alternative penalty or sanction (if any) would be appropriate.
- 10. Upon receiving a Request for Reconsideration, the Discipline Chair may decide to accept or reject the Respondent's suggestion for an alternative sanction.
- 11. Should the Discipline Chair accept the Respondent's suggestion for an alternative sanction, that sanction will take effect immediately.
- 12. Should the Discipline Chair not accept the Respondent's suggestion for an alternative sanction, the initial complaint or incident will be handled under Process #2 of this policy.

**PROCESS #2: Handled by Case Manager and Discipline Panel Case Manager**

- 13. Following the determination that the complaint or incident should be handled under Process #2, the Case Manager has a responsibility to:
  - a. Propose the use of alternative dispute resolution techniques
  - b. Appoint the Discipline Panel, if necessary
  - c. Coordinate all administrative aspects of the process and set reasonable timelines
  - d. Provide administrative assistance and logistical support to the Discipline Panel as required
  - e. Provide any other service or support that may be necessary to ensure a fair and timely proceeding
- 14. The Case Manager will establish and adhere to timelines that ensure procedural fairness and that the matter is heard in a timely fashion.
- 15. The Case Manager may propose using alternative dispute resolution methods, such as mediation or negotiated settlement.
- 16. If the dispute is not resolved using alternative methods, the Case Manager will appoint a Discipline Panel of three people to hear the complaint. The Case Manager will appoint one of the Discipline Panel's members to serve as the Chair.
- 17. The Case Manager, in cooperation with the Discipline Panel, will then decide the format under which the complaint will be heard. This decision may not be appealed. The format of the hearing may be an oral in-person hearing, an oral hearing by telephone or other communication medium, a hearing based on a review of documentary evidence submitted in advance of the hearing, or a combination of these methods.
- 18. The hearing will be governed by the procedures that the Case Manager and the Discipline Panel deem appropriate for the circumstances. The following guidelines will apply to the hearing:
  - a. The Parties will be given appropriate notice of the day, time, and place of the hearing.
  - b. Copies of any written documents which any Party wish to have the Discipline Panel consider will be provided to all Parties, through the Case Manager, in advance of the hearing.
  - c. The Parties may engage a representative, advisor, or legal counsel at their own expense.
  - d. The Discipline Panel may request that any other individual participate and give evidence at the hearing.
  - e. The Discipline Panel may allow as evidence at the hearing any oral evidence and document or thing relevant to the subject matter of the complaint, but may exclude such evidence that is unduly repetitious, and shall place such weight on the evidence as it deems appropriate.
- 19. If the Respondent acknowledges the facts of the incident, the Respondent may waive the hearing, in which case the Discipline Panel will determine the appropriate sanction. The Discipline Panel may still hold a hearing



for the purpose of determining an appropriate sanction.

20. The hearing will proceed in any event, even if a Party chooses not to participate in the hearing.
21. In fulfilling its duties, the Discipline Panel may obtain independent advice.
22. Discipline Panel decisions will be made by majority vote.

#### Decision

23. After hearing the matter, the Discipline Panel will determine by majority vote whether an infraction has occurred and, if so, the sanctions to be imposed. Within fourteen (14) days of the hearing's conclusion, the Discipline Panel's written decision and explanation will be distributed electronically to all Parties, the Case Manager, to Golf Canada, and to Alberta Golf or Member Club as applicable. In extraordinary circumstances, the Discipline Panel may first issue a verbal or summary decision soon after the hearing's conclusion, with the full written decision to be issued before the end of the fourteen (14) day period. The decision will be considered a matter of public record unless decided otherwise by the Discipline Panel.

#### Sanctions

24. \*Prior to determining sanctions, the Discipline Chair or Discipline Panel, as applicable, will consider factors relevant to determining appropriate sanctions which include:
  - a. The nature and duration of the Respondent's relationship with the Complainant, including whether there is a Power Imbalance;
  - b. The Respondent's prior history and any pattern of inappropriate behaviour or Maltreatment;
  - c. The ages of the individuals involved;
  - d. Whether the Respondent poses an ongoing and/or potential threat to the safety of others;
  - e. The Respondent's voluntary admission of the offense(s), acceptance of responsibility for the Maltreatment, and/or cooperation in the process of Alberta Golf;
  - f. Real or perceived impact of the incident on the Complainant, sport organization or the sporting community;
  - g. Circumstances specific to the Respondent being sanctioned (e.g. lack of appropriate knowledge or training regarding the requirements in the *Code of Conduct and Ethics*; addiction; disability; illness);
  - h. Whether, given the facts and circumstances that have been established, continued participation in the sport community is appropriate;
  - i. A Respondent who is in a position of trust, intimate contact or high-impact decision-making may face more serious sanctions; and/or
  - j. Other mitigating and aggravating circumstances.
25. \*Any single factor, if severe enough, may be sufficient to justify the sanction(s) imposed. A combination of several factors may justify elevated or combined sanctions.
26. \*The Discipline Chair or Discipline Panel, as applicable, may apply the following disciplinary sanctions, singularly or in combination:
  - a. **Verbal or Written Warning** - A verbal reprimand or an official, written notice and formal admonition that a Participant has violated the *Code of Conduct and Ethics* and that more severe sanctions will result should the Participant be involved in other violations.
  - b. **Education** - The requirement that a Participant undertake specified educational or similar remedial measures to address the violation(s) of the *Code of Conduct and Ethics*.
  - c. **Probation** - Should any further violations of the *Code of Conduct and Ethics* occur during the probationary period, will result in additional disciplinary measures, likely including a period of suspension or permanent ineligibility. This sanction can also include loss of privileges or other



conditions, restrictions, or requirements for a specified period of time.

- d. **Suspension** - Suspension, either for a set time or until further notice, from participation, in any capacity, in any program, practice, activity, event, or competition sponsored by, organized by, or under the auspices of Alberta Golf. A suspended Participant is eligible to return to participation, but reinstatement may be subject to certain restrictions or contingent upon the Participant satisfying specific conditions noted at the time of suspension.
- e. **Eligibility Restrictions** - Restrictions or prohibitions from some types of participation but allowing participation in other capacities under strict conditions.
- f. **Permanent Ineligibility** - Permanent ineligibility to participate, in any sport, in any capacity, in any program, activity, event, or competition sponsored by, organized by, or under the auspices of Golf Canada, Alberta Golf or Member Club, and/or any sport organization subject to the UCCMS.
- g. **Other Discretionary Sanctions** - Other sanctions may be imposed, including, but not limited to, other loss of privileges, no contact directives, a fine or a monetary payment to compensate for direct losses, or other restrictions or conditions as deemed necessary or appropriate.

27. \*The Discipline Chair or Discipline Panel, as applicable, may apply the following presumptive sanctions which are presumed to be fair and appropriate for the listed Maltreatment:

- a. Sexual Maltreatment involving a Minor Complainant shall carry a presumptive sanction of permanent ineligibility.
- b. Sexual Maltreatment, Physical Maltreatment with contact, and Maltreatment related to Process shall carry a presumptive sanction of either a period of suspension or eligibility restrictions.
- c. While a Respondent has pending charges or dispositions in violation of the criminal law, the presumptive sanction shall be a period of suspension.

28. A Participant's conviction for a *Criminal Code* offense shall carry a presumptive sanction of permanent ineligibility from participating with Alberta Golf. *Criminal Code* offences may include, but are not limited to:

- a. Any child pornography offences
- b. Any sexual offences
- c. Any offence of physical violence
- d. Any offence of assault
- e. Any offence involving trafficking of illegal drugs

29. Unless the Discipline Panel decides otherwise, any disciplinary sanctions will begin immediately, notwithstanding an appeal. Failure to comply with a sanction as determined by the Discipline Panel will result in an automatic suspension until such time as compliance occurs.

30. Records of all decisions will be maintained by Golf Canada. Alberta Golf and Member Clubs will submit all records to Golf Canada.

## Appeals

31. The decision of the Discipline Panel may be appealed in accordance with the *Appeal Policy*.

## Suspension Pending a Hearing

32. Alberta Golf may determine that an alleged incident is of such seriousness as to warrant suspension of a Participant pending completion of an investigation, criminal process, the hearing, or a decision of the Discipline Panel.

## Confidentiality

33. The discipline and complaints process is confidential and involves only Alberta Golf, the parties, the Case Manager, the Discipline Chair, the Discipline Panel, and any independent advisors to the Discipline Panel.



Once initiated and until a decision is released, none of the parties will disclose confidential information relating to the discipline or complaint to any person not involved in the proceedings.

34. Any failure to respect the aforementioned confidentiality requirement may result in further sanctions or discipline by the Discipline Chair or Discipline Panel (as applicable).

#### **Timelines**

35. If the circumstances of the complaint are such that adhering to the timelines outlined by this Policy will not allow a timely resolution to the complaint, the Case Manager may direct that these timelines be revised.

#### **Records and Distribution of Decisions**

36. Other individuals or organizations, including but not limited to, national sport organizations, Provincial/Territorial sport organizations, sport clubs, etc., may be advised of any decisions rendered in accordance with this Policy.
37. \* Alberta Golf recognizes that a publicly-available searchable database or registry of Respondents who have been sanctioned, or whose eligibility to participate in sport has in some way been restricted, may be maintained and may be subject to provisions in the UCCMS.



## DISPUTE RESOLUTION POLICY

### Purpose

1. Alberta Golf supports the principles of Alternative Dispute Resolution (ADR) and is committed to the techniques of negotiation, facilitation, and mediation as effective ways to resolve disputes. ADR also avoids the uncertainty, costs, and other negative effects associated with lengthy appeals or complaints, or with litigation.
2. Alberta Golf encourages all Participants to communicate openly, and to collaborate and use problem-solving and negotiation techniques to resolve their differences. Alberta Golf believes that negotiated settlements are most often preferable to arbitrated outcomes. Negotiated resolutions to disputes with and among Participants are strongly encouraged.

### Application of this Policy

3. This Policy applies to all Participants.
4. Opportunities for ADR may be pursued at any point in a dispute when all parties to the dispute agree that such a course of action would be mutually beneficial.

### Facilitation and Mediation

5. If all parties to a dispute agree to ADR, a mediator or facilitator, acceptable to all parties, shall be appointed to mediate or facilitate the dispute.
6. The mediator or facilitator shall decide the format under which the dispute shall be mediated or facilitated and may, if they consider it appropriate, specify a deadline before which the parties must reach a negotiated decision.
7. Should a negotiated settlement be reached, the settlement shall be reported to Alberta Golf. Any actions that are to take place because of the decision shall be enacted on the timelines specified by the negotiated decision, pending approval.
8. Should a negotiated settlement not be reached by the deadline specified by the mediator or facilitator at the start of the process (if set), or if the parties to the dispute do not agree to ADR, the dispute shall be considered under the appropriate section of the *Discipline and Complaints Policy* or *Appeal Policy*, as applicable.

### Final and Binding

9. Any negotiated settlement will be binding on the parties. Negotiated settlements may not be appealed.



## APPEAL POLICY AND PROCEDURE

### Purpose

1. This *Appeal Policy and Procedure* provides Participants with a fair and expedient appeal process.

### Scope and Application of this Policy

2. This Policy applies to all Participants.
3. Any Participant who is directly affected by a decision made by Alberta Golf shall have the right to appeal that decision provided that there are sufficient grounds for the appeal under the **Grounds for Appeal** section of this Policy.
4. This Policy **will apply** to decisions relating to:
  - a. Eligibility
  - b. Selection
  - c. Conflict of Interest
  - d. Discipline
  - e. Membership
5. This Policy **will not apply** to decisions relating to:
  - a. Matters that are decided by and within the jurisdiction of the general membership of Alberta Golf including enactment and amendment of the By-Laws and election of Directors.
  - b. Decisions made based on the Rules of Golf, Rules of Handicapping or the Rules of Amateur Status, each of which have their own appeal procedures that must be followed).
  - c. Enactment of and amendment to or repeal of competition rules (Alberta Golf's Terms of Competition and any Local Rules).
  - d. Those decisions which are required of or imposed upon Alberta Golf by outside authorities or agencies (e.g. Sport Canada, Coaching Association of Canada, Canadian Centre for Ethics in Sport, World Anti-Doping Agency, Sport Dispute Resolution Centre, etc.).
  - e. Disciplinary matters arising during events organized by entities other than Alberta Golf, which are dealt with under the policies of these other entities (Code of Conduct for Players Policy and Code of Conduct for Parents and Spectators Policy).
  - f. Volunteer appointments and the withdrawal of those appointments by the Board of Directors and its appointed committees.
  - g. Matters of budgeting and budget implementation.
  - h. Matters of operational structure, employment and staffing.
  - i. Employment.
  - j. Infractions for doping offenses.
  - k. Commercial matters for which another appeals process exists under a contract or applicable law.
  - l. Decisions made under this Policy.

### Timing of Appeal

6. Participants who wish to appeal a decision have seven (7) days from the date on which they received notice of the decision to submit electronically, a written notice of their intent to appeal.
7. A Participant who wishes to initiate an appeal beyond the seven (7) day period must provide a written request stating the reasons for an exemption. The decision to permit an appeal beyond the seven (7) day period will be at the sole discretion of the Appeal Manager and may not be appealed.



8. An administrative fee of \$200 must be submitted with the notice to appeal. This administrative fee will be refunded if the appeal is successful.

### **Submitting an Appeal**

9. Appeals of decisions made by Alberta Golf or a Member Club can be submitted internally to be heard pursuant to the terms of the applicable organization's policy for appeals. If a Member Club does not have a policy for appeals, Alberta Golf may hear appeals of decisions made by a Member Club.
10. Appeals of decisions made by Alberta Golf can be submitted to Alberta Golf to be heard pursuant to this Policy.
11. Decisions made pursuant to the *Discipline and Complaints Policy and Procedure* may be appealed to Alberta Golf in accordance with the terms of this *Appeal Policy and Procedure*.
12. By agreement between the parties, this appeal process may be bypassed and the appeal may be heard directly before the Sport Dispute Resolution Centre of Canada (SDRCC).
13. Except where an appeal proceeds before the SDRCC, Alberta Golf shall appoint an Appeal Manager and shall follow the process outlined in this *Appeal Policy and Procedure*.

### **Grounds for Appeal**

14. A decision cannot be appealed on its merits alone. An appeal may only be heard if there are sufficient grounds for appeal. Sufficient grounds include the Respondent:
  - a. Made a decision that it did not have the authority or jurisdiction (as set out in the Respondent's governing documents) to make.
  - b. Failed to follow its own procedures (as set out in the Respondent's governing documents).
  - c. Made a decision that was influenced by bias (where bias is defined as a lack of neutrality to such an extent that the decision-maker appears not to have considered other views).
  - d. Made a decision that was patently unreasonable.

### **Appeal Procedure**

#### **Written notice**

1. To initiate an appeal, a written notice of intent to appeal must be submitted. The written notice must contain the following:
  - a. Contact information.
  - b. Name and contact information of the Respondent and any Affected Parties, when known to the Appellant.
  - c. Date the Appellant was advised of the decision being appealed.
  - d. A copy of the decision being appealed, or description of decision if a written document is not available.
  - e. Grounds for the appeal.
  - f. Detailed reasons for the appeal.
  - g. All evidence that supports these grounds.
  - h. Requested remedy or remedies.
  - i. An administration fee of two hundred dollars (\$200), which will be refunded if the appeal is successful.

#### **Screening of Appeal**

2. The parties may first attempt to resolve the appeal through the *Dispute Resolution Policy*.



3. Appeals resolved under the *Dispute Resolution Policy* will result in the administration fee being refunded to the Appellant.
4. Should the appeal not be resolved by using the *Dispute Resolution Policy*, Alberta Golf will appoint an independent Appeal Manager (who must not be in a conflict of interest or have any direct relationship with the parties) who has the following responsibilities:
  - a. To determine if the appeal falls under the scope of this Policy.
  - b. To determine if the appeal was submitted in a timely manner.
  - c. To decide whether there are sufficient grounds for the appeal.
5. If the Appeal Manager denies the appeal based on insufficient grounds, because it was not submitted in a timely manner, or because it did not fall under the scope of this Policy, the Appellant will be notified, in writing, of the reasons for this decision. This decision may not be appealed.
6. If the Appeal Manager is satisfied there are sufficient grounds for an appeal, the Appeal Manager will appoint an Appeal Panel composed of three persons (who must not be in a conflict of interest position or have any direct relationship with the parties) to hear the appeal. The Appeal Manager will appoint one of the Panel's members to serve as the Chair.
7. In order to confirm the identification of any Affected Parties, the Appeal Manager will engage Alberta Golf. The Appeal Manager, in their sole discretion, may determine whether a party is an Affected Party.

#### **Procedure for Appeal Hearing**

8. The Appeal Manager shall notify the Parties that the appeal will be heard. The Appeal Manager shall then decide the format under which the appeal will be heard. This decision is at the sole discretion of the Appeal Manager and may not be appealed.
9. If a party chooses not to participate in the hearing, the hearing will proceed in any event.
10. The format of the hearing may involve an oral in-person hearing, an oral hearing by telephone or other electronic means, a hearing based on a review of documentary evidence submitted in advance of the hearing, or a combination of these methods.
11. The hearing will be governed by procedures that the Appeal Manager and the Panel deem appropriate in the circumstances. The following guideless will apply to the hearing:
  - a. The hearing will be held within a timeline determined by the Appeal Manager.
  - b. The Parties will be given reasonable notice of the day, time and place of an oral in-person hearing or oral hearing by telephone or electronic communications.
  - c. Copies of any written documents which any Party wishes to have the Panel consider will be provided to all Parties in advance of the hearing.
  - d. The Parties may be accompanied by a representative, advisor, or legal counsel at their own expense.
  - e. The Panel may request that any other individual participate and give evidence at an oral in-person hearing or oral hearing by telephone or electronic communications.
  - f. The Panel may allow as evidence at the hearing any oral evidence and document or thing relevant to the subject matter of the appeal, but may exclude such evidence that is unduly repetitious and shall place such weight on the evidence as it deems appropriate.
  - g. If a decision in the appeal may affect another party to the extent that the other party would have recourse to an appeal in their own right under this Policy, that party will become an Affected Party to the appeal in question and will be bound by its outcome.
  - h. The decision to uphold or reject the appeal will be by a majority vote of Panel members.
12. In fulfilling its duties, the Panel may obtain independent advice.

#### **Appeal Decision**

Last Updated: February 29, 2024  
Last Reviewed: February 29, 2024





13. The Appellant must demonstrate, on a balance of probabilities, that the Respondent has made a procedural error as described in the **Grounds for Appeal** section of this Policy and that this error had, or may reasonably have had, a material effect on the decision or decision-maker.
14. The Panel shall issue its decision in writing within seven (7) days after the hearing's conclusion.
15. In making its decision, the Panel will have no greater authority than that of the original decision-maker. The Panel may decide to:
  - a. Reject the appeal and confirm the decision being appealed;
  - b. Uphold the appeal and refer the matter back to the initial decision-maker for a new decision; or
  - c. Uphold the appeal and vary the decision.
16. The Panel will also determine whether costs of the appeal, excluding legal fees and legal disbursements of any parties, will be assessed against any party. In assessing costs, the Panel will take into account the outcome of the appeal, the conduct of the parties, and the parties' respective financial resources.
17. The Panel's written decision, with explanations, will be distributed to all parties, the Appeal Manager, and Alberta Golf. In extraordinary circumstances, the Panel may first issue a verbal or summary decision soon after the hearing's conclusion, with the full written decision to be issued thereafter. The decision will be considered a matter of public record unless decided otherwise by the Panel.

#### **Timelines**

18. If the circumstances of the appeal are such that adhering to the timelines outlined by this Policy will not allow a timely resolution to the appeal, the Appeal Manager and/or Panel may direct that these timelines be revised.

#### **Confidentiality**

19. The appeals process is confidential and involves only the parties, the Appeal Manager, the Panel, and any independent advisors to the Panel. Once initiated and until a decision is released, none of the Parties will disclose confidential information to any person not involved in the proceedings.

#### **Final and Binding**

20. No action or legal proceeding will be commenced against Alberta Golf or Participants in respect of a dispute, unless Alberta Golf has refused or failed to provide or abide by the dispute resolution process and/or appeal process as set out in governing documents.



## SOCIAL MEDIA POLICY

### Preamble

1. Alberta Golf is aware that Participant interaction and communication occurs frequently on social media. Alberta Golf cautions Participants that any conduct falling short of the standard of behaviour required by this *Social Media Policy* and the *Code of Conduct and Ethics* may be subject to the disciplinary sanctions identified within the *Discipline and Complaints Policy*.

### Application of this Policy

2. This Policy applies to all Participants.

### Conduct and Behaviour

3. All conduct and behaviour occurring on Social Media must comply with the *Code of Conduct and Ethics*.
4. Participants may not engage in the following behaviour on social media:
  - a. Posting a disrespectful, hateful, harmful, disparaging, or insulting comment on a social medium that is directed at a Participant, at Alberta Golf, or at other individuals connected with Alberta Golf.
  - b. Posting a picture, altered picture, or video on a social medium that is harmful, disrespectful, insulting, embarrassing, suggestive, provocative, or otherwise offensive, and that is directed at a Participant, at Alberta Golf, or at other individuals connected with Alberta Golf.
  - c. Creating or contributing to a Facebook group, webpage, Instagram account, Twitter feed, blog, or online forum devoted solely or in part to promoting negative or disparaging remarks or commentary about Alberta Golf or its stakeholders or reputation.
  - d. Any instance of cyber-bullying or cyber-harassment between one Participant and another Participant (including a teammate, coach, opponent, volunteer, or official), where incidents of cyber-bullying and cyber-harassment can include but are not limited to the following conduct on any social medium, via text-message, or via email: regular insults, negative comments, vexatious behaviour, pranks or jokes, threats, posing as another person, spreading rumours or lies, or other harmful behaviour.
5. Violations of this Social Media Policy may be subject to the *Discipline and Complaints Policy*.
6. If Alberta Golf unofficially engages with a Participant on Social Media (such as by retweeting a tweet or sharing a photo on Facebook) the Participant may, at any time, ask Alberta Golf to cease this engagement.
7. Removing content from Social Media after it has been posted (either publicly or privately) does not excuse the Participant from being subject to the *Discipline and Complaints Policy*.
8. An individual who believes that a Participant's Social Media activity is inappropriate or may violate policies and procedures should report the matter to Alberta Golf in the manner outlined by the *Discipline and Complaints Policy*.

### Alberta Golf Responsibilities

9. Alberta Golf has a responsibility to understand if and how Persons in Authority and Athletes are using Social Media to communicate with each other.
10. Complaints and concerns about the behaviour of a Person in Authority or Athlete in Social Media can be addressed under the *Discipline and Complaints Policy*.



## SCREENING POLICY

### Definitions

1. The following defined terms appear in this Policy:
  - a. ***Criminal Record Check (CRC)*** – A search of the RCMP Canadian Police Information Centre (CPIC) system for adult convictions.
  - b. ***Enhanced Police Information Check (E-PIC)*** – a Criminal Record Check plus a search of Local Police Information, available from Sterling Backcheck.
  - c. ***Local Police Information (LPI)*** – Additional conviction and selected non-conviction information in national and local police data sources which may be relevant to the position sought.
  - d. ***Vulnerable Sector Check (VSC)*** – A detailed check that includes a search of the RCMP Canadian Police Information Centre (CPIC) system, Local Police Information, and the Pardoned Sex Offender database.

### Preamble

2. Alberta Golf understands that screening personnel and volunteers is a vital part of providing an abuse-free sporting environment and has become a common practice among sport organizations that provide programs and services to the sport community.

### Application of this Policy

3. This Policy applies to all individuals whose position with Alberta Golf is one of trust or authority which may relate to, at a minimum, finances, supervision, or Vulnerable Participants.
4. Not all individuals associated with Alberta Golf will be required to obtain a criminal record check or submit screening documents because not all positions pose a risk of harm to Alberta Golf, or participants. Alberta Golf will determine which individuals will be subject to screening using the following guidelines:

**Level 1 – Low Risk** - Participants involved in low-risk assignments who are not in a supervisory role, not directing others, not involved with finances, and/or do not have unsupervised access to Vulnerable Participants. Examples:

- a. Parents, youth, or volunteers who are helping on a non-regular or informal basis.

**Level 2 – Medium Risk** – Participants involved in medium risk assignments who may be in a supervisory role, may direct others, may be involved with finances, and/or who may have limited access to Vulnerable Participants.

Examples:

- a. Athlete support personnel
- b. Non-coach employees or managers
- c. Alberta Golf staff including interns
- d. Directors
- e. Volunteers and committee members working at Alberta Golf events
- f. Officials

**Level 3 – High Risk** – Participants involved in high-risk assignments who occupy positions of trust and/or authority, have a supervisory role, direct others, are involved with finances, and who have frequent or unsupervised access to Vulnerable Participants. Examples:

- a. Alberta Golf contract coaches
- b. Coaches who travel with Athletes
- c. Coaches who could be alone with Athletes

### Screening Committee

5. The implementation of this policy is the responsibility of the Screening Committee which is a committee composed of either one (1) or three (3) members. Alberta Golf will ensure that the members appointed to their respective Screening Committees possess the requisite skills, knowledge and abilities to accurately screen documents and render decisions under this Policy.



6. The Screening Committee is responsible for reviewing all documents submitted and, based on the review, making decisions regarding the appropriateness of individuals filling positions within Alberta Golf. In carrying out its duties, the Screening Committee may consult with independent experts including lawyers, police, risk management consultants, or volunteer screening specialists.
7. Nothing in this Policy restricts or limits the Screening Committee from requesting that the individual attend an interview with the Screening Committee if the Screening Committee considers that an interview is appropriate and necessary to screen the individual's application.
8. Nothing in this Policy restricts or limits the Screening Committee from requesting the individual's authorization to contact any professional, sporting or other organization in order to assess the individual's suitability for the position that they are seeking.
9. Nothing in this Policy restricts or limits the Screening Committee from requesting further information from the individual on more than one occasion, subject to the individual's right to insist that the Screening Committee make a decision on the basis of the information before it.
10. The Screening Committee may, where appropriate, draw an adverse inference from an individual's failure to provide information or answer queries.
11. When assessing an individual's screening application, the Screening Committee shall determine whether there is reason to believe that the individual may pose a risk to Alberta Golf, to a Member, or to another individual.
12. An individual having been previously penalized for a prior offence shall not prevent the Screening Committee from considering that offence as part of the individual's screening application.
13. If the Screening Committee determines on the basis of the individual's screening application, in addition to any further material received by it, that the individual does not pose a risk to the members of Alberta Golf the Screening Committee shall approve the individual's application, subject to the Screening Committee's right to impose conditions.
14. In the case of a decision denying an application or approving an application with conditions, a copy of the decision shall be provided to the applicant and to the Board of Directors of Alberta Golf, which may disseminate the decision as they see fit in order to best fulfil the mandate of Alberta Golf.
15. A Participant whose screening application has been denied or revoked may not re-apply to participate in the programs or activities of Alberta Golf for two (2) years from the date the rejected application was made.

### **Screening Requirements**

16. A Screening Requirements Matrix is provided as Appendix C - Screening Policy Requirements Matrix.
17. It is the policy of Alberta Golf that when an individual is first engaged by the organization:
  - a. Level 1 individuals will:
    - i. Complete an Application Form (Appendix D – Screening Policy Application Form)
    - ii. Complete a Screening Disclosure Form (Appendix E – Screening Policy Disclosure Form)
    - iii. Participate in training, orientation, and monitoring as described in the Screening Requirements Matrix (Appendix C Screening Policy Requirements Matrix)
  - b. Level 2 individuals will:
    - i. Complete an Application Form
    - ii. Complete a Screening Disclosure Form
    - iii. Complete and provide an E-PIC



- iv. Provide one letter of reference related to the position
  - v. Participate in training, orientation, and monitoring as described in the Screening Requirements Matrix (Appendix C Screening Policy Requirements Matrix)
  - vi. Provide a driver's abstract, if requested
- c. Level 3 individuals will:
- i. Complete an Application Form
  - ii. Complete a Screening Disclosure Form
  - iii. Complete and provide an E-PIC and a VSC
  - iv. Provide one letter of reference related to the position
  - v. Participate in training, orientation, and monitoring as described in the Screening Requirements Matrix (Appendix C - Screening Policy Requirements Matrix)
  - vi. Provide a driver's abstract, if requested
- d. If an individual subsequently receives a charge, conviction for, or is found guilty of, an offense they will report this circumstance immediately to Alberta Golf. Additionally, the individual will inform the organization of any changes in their circumstance that would alter their original responses in their Screening Disclosure Form.
- e. If Alberta Golf learns that an individual has provided false, inaccurate, or misleading information, the individual will immediately be removed from their position and may be subject to further discipline in accordance with the *Discipline and Complaints Policy*.

### Young People

18. The Province of Alberta defines a young person as someone who is younger than 18 years old. When screening young people, Alberta Golf will:
- a. Not require the young person to obtain a VSC or E-PIC; and
  - b. In lieu of obtaining a VSC or E-PIC, require the young person to submit up to two (2) additional letters of reference.
19. Notwithstanding the above, Alberta Golf may ask a young person to obtain a VSC or E-PIC if the organization suspects the young person has an adult conviction and therefore has a criminal record. In these circumstances, the organization will be clear in its request that it is not asking for the young person's *youth record*. Alberta Golf understands that they may not request to see a young person's youth record.

### Renewal

20. Unless the Screening Committee determines, on a case-by-case basis, to modify the submission requirements, individuals who are required to submit an E-PIC, Screening Disclosure Form, or Screening Renewal Form, are required to submit the documents as follows:
- a. An E-PIC every three years
  - b. A Screening Disclosure Form every three years
  - c. A Screening Renewal Form (Appendix F – Screening Policy Renewal Form) every year
  - d. A Vulnerable Sector Check once
21. At any time, including after either the submission of an individual's application or its approval (with or without conditions), the Screening Committee may re-open an individual's file for additional screening if it is advised of new information that, in the discretion of Alberta Golf, could affect the assessment of the individual's suitability for participation in the programs or activities of Golf Alberta or the individual's interactions with other individuals involved with Alberta Golf (as applicable).



### Orientation, Training, and Monitoring

22. The type and amount of orientation, training, and monitoring will be based on the individual's level of risk, at the discretion of Alberta Golf.
23. Orientation may include, but is not limited to: introductory presentations, facility tours, equipment demonstrations, parent/Athlete meetings, meetings with colleagues and supervisors, orientation manuals, orientation sessions, and increased supervision during initial tasks or initial period of engagement.
24. Training may include, but is not limited to: certification courses, online learning, mentoring, workshop sessions, webinars, on-site demonstrations, and peer feedback.
25. At the conclusion of orientation and training, the individual will be required to acknowledge, in written form, that they have received and completed the orientation and training (Appendix G – Volunteer Orientation and Training Acknowledgement Form).
26. Monitoring may include but is not limited to: written or oral reports, observations, tracking, electronic surveillance (e.g., facility security cameras), and site visits.

### How to Obtain an E-PIC or VSC

27. Alberta Golf has access to the E-PIC at a discounted rate. Participants can obtain an E-PIC via [https://www.sterlingtalentsolutions.ca/landing-pages/c/cac\\_ace/](https://www.sterlingtalentsolutions.ca/landing-pages/c/cac_ace/)
28. Participants may only obtain a VSC by visiting an RCMP office or police station, submitting two pieces of government-issued identification (one of which must have a photo), and completing any required paperwork. Fees may also be required. Alberta's *Freedom of Information and Protection of Privacy Act* [RSA 2000, c F-25](#), ss 39(1)(b) and 40(1)(d) and the federal *Privacy Act*, [RSC 1985, c P-21](#), ss 7-8 – require police services to obtain an applicant's consent before they conduct, and disclose the results of, a police record check.
29. Fingerprinting may be required if there is a positive match with the individual's gender and birthdate.
30. Alberta Golf understands that they may be required to assist an individual with obtaining a VSC. A Request for VSC (Appendix H - Request For Vulnerable Sector Check) may need to be submitted or other documentation may need to be completed that describes the nature of the organization and the individual's role with Vulnerable Participants.

### Screening Procedure

1. Screening documents must be submitted to the Screening Committee.
2. An individual who refuses or fails to provide the necessary screening documents will be ineligible to volunteer or apply for the position sought. The individual will be informed that their application and/or position will not proceed until such time as the screening documents are submitted.
3. Alberta Golf understands that there may be delays in receiving the results of an E-PIC or a VSC. At the discretion of Alberta Golf, an individual may be permitted to participate in the role during the delay. This permission may be withdrawn at any time and for any reason.
4. Alberta Golf recognizes that different information will be available depending on the type of screening document that the individual has submitted. For example, an E-PIC may show details of a specific offense, or not, and/or a VSC may be returned with specific information or simply a notification indicating 'cleared' or 'not cleared'. The Screening Committee will use its expertise and discretion when making decisions based on the screening documents that have been submitted.



5. Following the review of the screening documents, the Screening Committee will decide:
  - a. The individual has passed screening and may participate in the desired position;
  - b. The individual has passed screening and may participate in the desired position with conditions;
  - c. The individual has not passed screening and may not participate in the desired position; or
  - d. More information is required from the individual.
6. In making its decision, the Screening Committee will consider the type of offense, date of offense, and relevance of the offense to the position sought.
7. The Screening Committee may decide that an individual has not passed screening if the screening documentation reveals any of the following:
  - a. If imposed in the last ten years:
    - i. Any offense involving the use of a motor vehicle, including but not limited to impaired driving
    - ii. Any offense involving conduct against public morals
    - iii. Any offense involving theft or fraud
  - b. If imposed at any time:
    - i. Any offense involving a Minor or Minors
    - ii. Any offense of assault, physical or psychological violence
    - iii. Any offense involving trafficking or possession of illegal drugs
    - iv. Any offense involving the possession, distribution, or sale of any child-related pornography
    - v. Any sexual offense

#### Conditions and Monitoring

8. Excluding the incidents above which, if revealed, would cause the individual to not pass screening, the Screening Committee may determine that incidents revealed on an individual's screening documents may allow the individual to pass the screening process and participate in a desired position with *conditions* imposed. The Screening Committee shall have the sole and unfettered discretion to apply and remove conditions, determine the length of time for the imposition of conditions, and determine the means by which adherence to conditions may be monitored.

#### Records

9. All records will be maintained in a confidential manner and will not be disclosed to others except as required by law, for use in legal, quasi-legal, or disciplinary proceedings.
10. The records kept as part of the screening process include but are not limited to:
  - a. An individual's Vulnerable Sector Check
  - b. An individual's E-PIC (for a period of three years)
  - c. An individual's Screening Disclosure Form (for a period of three years)
  - d. An individual's Screening Renewal Form (for a period of one year)
  - e. Records of any conditions attached to an individual's registration by the Screening Committee
  - f. Records of any discipline applied to any individual by Golf Canada or by Alberta Golf or Member Club, or by another sport organization



## WHISTLEBLOWER POLICY

### Purpose

1. The Alberta Golf Association, operating as Alberta Golf is committed to fostering an environment conducive to open communication within the organization regarding Alberta Golf's business practices and to protecting Workers from unlawful retaliation and discrimination for their having properly disclosed or Reported illegal or unethical conduct.
2. To further this commitment, this policy:
  - a. Establishes guidance for the receipt, retention and treatment of verbal or written Reports received by Alberta Golf from a Worker regarding actions that (i) are illegal, unethical or contrary to Alberta Golf's policies in respect of accounting, internal controls, disclosure, or business practices or (ii) constitute discrimination, harassment, violence or abuse, whether submitted by Alberta Golf Workers who make a Report;
  - b. Provides Alberta Golf Workers who make a Report with a means to make Reports in a confidential and anonymous manner; and
  - c. Demonstrates Alberta Golf's intention to discipline, any person who commits an act of retaliation or reprisal against a Worker up to and including termination of employment for just cause, in the case of Alberta Golf employees.

### Application

3. This Policy only applies to Workers who observe or experience incidents of wrongdoing committed by other Workers.
4. Incidents of wrongdoing or misconduct observed or experienced by Participants, spectators, parents of Participants, or other individuals not employed or contracted by Alberta Golf can be Reported under the terms of the *Discipline and Complaints Policy* and/or Reported to Alberta Golf's President or CEO to be handled under the terms of the individual Worker's Employment Agreement or Contractor Agreement, as applicable, and/or Alberta Golf's policies for human resources.
5. Matters reported under the terms of this Policy may be referred to be heard under the *Discipline and Complaints Policy*, at the discretion of the Compliance Officer.

### Retention

6. Reports filed under this policy will be controlled and documented by the Director and Chair of the Audit and Risk Management Committee who shall maintain all related documentation for six years (or such longer period as required by law). All Reports and related documentation shall be retained in secured files to which only the Audit and Risk Management Committee Chair, and any future Chairs and legal counsel shall have full access, subject to legal obligations to otherwise disclose. If a Report is submitted to the Alternate Liaison which names the Chair of the Audit and Risk Management Committee, the Alternate Liaison shall maintain all related documentation.

### Wrongdoing

7. Wrongdoing can be defined as:
  - a. Violating the law;





- b. Intentionally or seriously breaching of the *Code of Conduct and Ethics*;
- c. Committing or ignoring risks to the life, health, or safety of a Participant, Worker, or other individual;
- d. Directing an individual or Worker to commit a crime, serious breach of a policy, or other wrongful act; or
- e. Fraud.

### **Pledge**

- 8. Alberta Golf pledges not to dismiss, penalize, discipline, or retaliate or discriminate against any Worker who discloses information or submits, in good faith, a report against another Worker under the terms of this Policy.
- 9. All Reports will be taken seriously and addressed promptly, discreetly and professionally. Reports may be submitted anonymously or the individual submitting the Report may request to remain anonymous. Their desire for anonymity, discussions and any documentation related to the Reports will be respected to the extent appropriate or permitted by law.

### **Retaliation**

- 10. Retaliation against any Worker who in good faith files a Report or participates in an investigation in connection with a Report is strictly prohibited. Anyone determined to have engaged in retaliatory behaviour or who fails to maintain a Worker's anonymity if requested (and as permitted at law) may be subject to discipline, up to and including termination of employment for just cause, in the case of Alberta Golf employees. Any Worker who feels that he or she has been subjected to any behavior that violates this policy should immediately report such behaviour to his or her supervisor, the Human Resources Manager, the Ethics Commissioner, or the Chair of the Audit and Risk Management Committee.
- 11. Anyone who knowingly files a misleading or false Report, or who does not have a reasonable belief as to the truth or accuracy of the Report, may be subject to discipline, up to and including termination of employment for just cause, in the case of a Alberta Golf employee.
- 12. Any individual affiliated with Alberta Golf who breaks this Pledge will be subject to disciplinary action.

## **Whistleblower Policy Procedure**

### **Reporting Wrongdoing**

- 1. A Worker who believes that another Worker has committed an incident of wrongdoing should prepare a Report (Appendix I - Whistleblower Policy Complainant Report Form) that includes the following:
  - a. Written description of the act or actions that comprise the alleged wrongdoing, including the date and time of the action(s).
  - b. Identities and roles of other individuals or Workers (if any) who may be aware of, affected by, or complicit in, the wrongdoing.
  - c. Why the act or action should be considered to be wrongdoing; and
  - d. How the wrongdoing affects the Worker submitting the report (if applicable).



### Authority

The following Compliance Officer and Alternate Liaison have been appointed to receive reports made under this Policy:

Recipient        Brent Bailey  
Role              President and Chair, Board of Directors  
Phone            587.920.4465

Liaison           Mark Bamford  
Role              Past President, Board of Directors  
Phone            780.695.8143

2. After receiving the report, the Compliance Officer has the responsibility to:
  - a. Assure the Worker of the Pledge
  - b. Connect the Worker to the Alternate Liaison if the individual feels that he or she cannot act in an unbiased or discrete manner due to the individual's role with the organization and/or the content of the report.
  - c. Determine if the report is frivolous, vexatious, or not submitted in good faith (e.g., the submission of the report is motivated by personal interests and/or the content of the report is obviously false or malicious) and, if so, inform the Worker that no action will be taken on the report and the reasons why the report has been considered frivolous, vexatious, or not in good faith.
  - d. Determine if the *Whistleblower Policy* applies or if the matter should be handled under the *Discipline and Complaints Policy*.
  - e. Determine if the local police service be contacted.
  - f. Determine if mediation or alternative dispute resolution can be used to resolve the issue.
  - g. Determine if the CEO should or can be notified of the report.
  - h. Begin an investigation.

### Alternate Liaison

3. If the Worker feels that the Compliance Officer is unable to act in an unbiased or discrete manner due to the individual's role with the organization and/or the content of the report, the Worker should contact the Alternate Liaison who will act as an independent liaison between the Worker and the Compliance Officer.
4. The Alternate Liaison will not disclose the Worker's identity to the Compliance Officer or to anyone affiliated with Alberta Golf without the Worker's consent.
5. A Worker who is unsure if they should submit a Report, or who does not want to have their identity known, may contact the Alternate Liaison for informal advice about the process.

### Investigation

6. If the Compliance Officer determines that an investigation should be launched, the Compliance Officer may decide to contract an external investigator. In such cases, the President or CEO may be notified that an investigation conducted by an external investigator is necessary without the nature of the investigation, content of the Report, or identity of the Worker who submitted the Report being disclosed. Alberta Golf's President or CEO may not unreasonably refuse the decision to contract an external investigator.
7. An investigation launched by the Compliance Officer or by an external investigator should generally take the following form:



- a. Follow-up interview with the Worker who submitted the Report, unless submitted anonymously.
- b. Identification of Workers, participants, volunteers or other individuals that may have been affected by the wrongdoing.
- c. Interviews with such-affected individuals.
- d. Interview with the Worker(s) against whom the Report was submitted.
- e. Interview with the supervisor(s) of the Worker(s) against whom the Report was submitted, if applicable.
- f. The investigator will prepare an Investigator's Report – omitting names whenever possible and striving to ensure confidentiality – that will be submitted to the President or CEO for review and action.

### Decision

8. Within fourteen (14) days after receiving the Investigator's Report, the President or CEO will take corrective action, as required. Corrective action may include, but is not limited to including:
  - a. Enacting and/or enforcing policies and procedures aimed at eliminating the wrongdoing or further opportunities for wrongdoing.
  - b. Revision of job descriptions; or
  - c. Discipline, suspension, termination, or other action as permitted by the By-laws, employment legislation, applicable policies for human resources, and/or the Worker's Employment Agreement or Contractor Agreement.
9. The corrective action, if any, will be communicated to the investigator who will then inform the Worker who submitted the report.
10. Decisions made under the terms of this Policy may be appealed under the terms of the *Appeal Policy* provided that:
  - a. If the Worker who submitted the initial report is appealing the decision, the Worker understands that his or her identity must be revealed if he or she submits an appeal, and
  - b. If the Worker against whom the initial report was submitted is appealing the decision, the Worker understands that the identity of the Worker who submitted the report will not be revealed and that Alberta Golf will act as the Respondent.

### Confidentiality

11. Confidentiality at all stages of the procedures outlined in this Policy – from the initial report to the final decision – is assured for all individuals (the Worker, the Worker(s), or Director(s) against whom the report is submitted, and the individuals interviewed during the investigation). An individual who intentionally breaches the confidentiality clause of this Policy will be subject to disciplinary action.
12. In all stages of the investigation, the investigator will take every precaution to protect the identity of the Worker who submitted the report and/or the specific nature of the report itself. However, Alberta Golf recognizes that there are some instances where the nature of the report and/or the identity of the Worker who submitted the report will or may be inadvertently deduced by individuals participating in the investigation.



## RECIPROCATATION POLICY

### Purpose

1. The purpose of this Policy is to ensure national enforcement and recognition of all disciplinary sanctions applied by Alberta Golf and where applicable, Golf Canada, and Member Clubs.
2. Alberta Golf recognizes the importance of safe sport for all participants in the sport of golf throughout the province. Alberta Golf also recognizes its obligation to engage an independent third party to handle and/or investigate all matters involving Harassment, Discrimination, Abuse, Workplace Harassment, Workplace Violence, Maltreatment, and Sexual Harassment.

### Application

3. It is the goal of Golf Canada that after review and consultation, Alberta Golf and Member Clubs will agree to sign on to and abide by this Policy.

### Responsibilities

4. Golf Canada will:
  - a. Provide copies of discipline and appeal decisions to Alberta Golf and to Member Club(s) affected or impacted by the decision.
  - b. For discipline decisions provided to Golf Canada by Alberta Golf or by a Member Club, determine per the *Discipline and Complaints Policy* whether to initiate further action against the individual(s) named in the decision.
  - c. Recognize and enforce the disciplinary sanctions imposed by Alberta Golf or Member Club.
5. Alberta Golf will:
  - a. Provide copies of discipline and appeal decisions involving Participants to Golf Canada and to the Member Club(s) affected or impacted by the decision.
  - b. For discipline decisions provided to Alberta Golf by Golf Canada or by a Member Club, determine per its own policies whether to initiate further action against the individual(s) named in the decision.
  - c. Recognize and enforce the disciplinary sanctions imposed by Golf Canada and/or a Member Club.
  - d. Update governing documents to reference the reciprocation procedures described herein.
6. Member Clubs will be requested to
  - a. Provide copies of discipline and appeal decisions involving Participants to Golf Canada and to Alberta Golf.
  - b. For discipline decisions provided to a Club by Golf Canada or by Alberta Golf, determine per its own policies whether to initiate further action against the Participant(s) named in the decision.
  - c. Recognize and enforce the disciplinary sanctions imposed by Golf Canada and/or Alberta Golf.
  - d. Update their governing documents to reference the reciprocation procedures described herein.



## Appendix A – Image Consent Form *[ATHLETE PROTECTION POLICY]*

Name of Participant (print): \_\_\_\_\_

1. I hereby grant to Alberta Golf and Golf Canada (collectively the “Organizations”) on a worldwide basis, the permission to photograph and/or record the Participant’s image and/or voice on still or motion picture film and/or audio tape (collectively the “Images”), and to use the Images to promote the sport and/or the Organizations through traditional media such as newsletters, websites, television, film, radio, print and/or display form, and through social media including but not limited to Instagram, Facebook, YouTube, and Twitter. I understand that I waive any claim to remuneration for use of audio/visual materials used for these purposes. This consent will remain in effect in perpetuity.
2. I hereby fully release, discharge, and agree to save harmless the Organizations, for any and all claims, demands, actions, damages, losses or costs that might arise out of the collection, use or disclosure of the Images or taking, publication, distortion of the Images, negatives, and masters or any other likeness or representation of the Participant that may occur or be produced in the taking of said Images or in any subsequent processing thereof, including without limitation any claims for libel, passing off, misappropriate of personality or invasion of privacy.
3. **I UNDERSTAND AND AGREE**, that I have read and understood the terms and conditions of this document. On behalf of me, my heirs and assigns, I agree that I am signing this document voluntarily and to abide by such terms and conditions.

Signature of Participant: \_\_\_\_\_

**OR**, if the Participant is younger than the age of majority

Signature of Parent/Guardian: \_\_\_\_\_

Date: \_\_\_\_\_

## Appendix B – Investigation Procedure [DISCIPLINE AND COMPLAINTS POLICY]

\* Indicates a section that has been adapted from the UCCMS

### Determination

1. When a complaint is submitted pursuant to the *Discipline and Complaints Policy*, the Case Manager will determine if the incident should be investigated.

### Investigation

2. The Case Manager will appoint an Investigator. The Investigator must be an independent third-party skilled in investigating. The Investigator must not be in a conflict-of-interest situation and should have no connection to either party.
3. Federal and/or Provincial/Territorial legislation related to Workplace Harassment may apply to the investigation if Harassment was directed toward a worker in a Workplace. The Investigator should review workplace safety legislation, the organization's policies for human resources, and/or consult independent experts to determine whether legislation applies to the complaint.
4. The investigation may take any form as decided by the Investigator, guided by any applicable Federal and/or Provincial/Territorial legislation. The investigation may include:
  - a. Interviews with the Complainant
  - b. Witness interviews
  - c. Statement of facts (Complainant's perspective) prepared by Investigator, acknowledged by the Complainant and provided to the Respondent
  - d. Interviews with the Respondent
  - e. Statement of facts (Respondent's perspective) prepared by Investigator, acknowledged by the Respondent and provided to the Complainant

### Investigator's Report

5. Upon completion of their investigation, the Investigator shall prepare a report that should include a summary of evidence from the parties (including both statements of facts, if applicable) and recommendations from the Investigator of whether, on a balance of probabilities, a breach of the *Code of Conduct and Ethics* occurred.
6. \*The Investigator must be aware that sport-specific differences exist with respect to such aspects as acceptable levels of touch, physical contact, and aggression during training or competition and will consider such differences during the investigative process.
7. The Investigator's Report will be provided to the Case Manager who will disclose it, at their discretion, to Alberta Golf or any other third party.
8. Should the Investigator find that there are possible instances of offence under the *Criminal Code*, particularly related to Criminal Harassment (or Stalking), Uttering Threats, Assault, Sexual Interference, or Sexual Exploitation, the Investigator shall advise the Complainant and Alberta Golf to refer the matter to police.
9. The Investigator must also inform Alberta Golf of any findings of criminal activity. Alberta Golf may decide whether to report such findings to police but is required to inform police if there are findings related to the trafficking of prohibited substances or methods (as indicated in the version of the World Anti-Doping Agency's Prohibited List currently in force), any sexual crime involving Minors, fraud against Alberta Golf, or other offences where the lack of reporting would bring Alberta Golf into disrepute.



### **Reprisal and Retaliation**

10. \*A Participant who submits a complaint to Alberta Golf or who gives evidence in an investigation may not be subject to reprisal or retaliation from any individual or group. Any such conduct may constitute Maltreatment and will be subject to disciplinary proceedings pursuant to the *Discipline and Complaints Policy*.

### **False Allegations**

11. A Participant who submits allegations that the Investigator determines to be malicious, false or for the purpose of retribution, retaliation or vengeance (or that otherwise fall within the definition of Maltreatment) may be subject to a complaint under the terms of the *Discipline and Complaints Policy* and may be required to pay for the costs of any investigation that comes to this conclusion. Alberta Golf or the Participant against whom the allegations were submitted may act as the Complainant.

### **Confidentiality**

12. The Investigator will make reasonable efforts to preserve the anonymity of the complainant, respondent, and any other party. However, Alberta Golf recognizes that maintaining full anonymity during an investigation may not be feasible.



## Appendix C – Screening Requirements Matrix [SCREENING POLICY]

Risk Level	Roles (Note Young People Exception Below)	Training Recommended or Required	Screening
Level 1 Low Risk	Parents, youth or volunteers acting in non-regular or informal basis	Recommended:  Respect in Sport for Activity Leaders  CAC Safe Sport Training	- Complete an Application Form (Appendix D – Screening Application Form) - Complete a Screening Disclosure Form (Appendix E – Screening Disclosure Form) - Participate in training, orientation, and monitoring as determined by the organization
Level 2 Medium Risk	a. Athlete support personnel b. Non-coach employees or managers c. Alberta Golf sport staff including interns d. Directors e. Volunteers and committee members working at Alberta Golf events f. Officials	Recommended based on role:  Respect in Sport for Activity Leaders  Commit to Kids  Required:  Respect in Sport Activity Leaders (National Officials) MED Certified (Coaches) CAC Safe Sport Training	Level 1 Requirements  Complete and provide an E-PIC  Provide one letter of reference related to the position  Provide a driver's abstract, if requested
Level 3 High Risk	a. Alberta Golf contract coaches b. Coaches who travel with athletes c. Coaches who could be alone with Athletes	Recommended based on role:  - Respect in Sport for Activity Leaders  - Commit to Kids  Required: - MED Certified - CAC Safe Sport Training	- Level 2 Requirements  - Provide a VSC  - A second letter of reference from a sport organization

### Young People

The Province of Alberta defines a young person as someone who is younger than 18 years old. When screening young people, Alberta Golf will:

- Not require the young person to obtain a VSC or E-PIC; and
- In lieu of obtaining a VSC or E-PIC, require the young person to submit up to two (2) additional letters of reference.





## Appendix D – VOLUNTEER APPLICATION FORM *(this form is available online)*

Which role you are applying for: REFEREE \_\_\_\_ COURSE RATER \_\_\_\_ CASINO \_\_\_\_

NAME: \_\_\_\_\_

DOB: \_\_\_\_\_

EMAIL: \_\_\_\_\_

PHONE: \_\_\_\_\_

ADDRESS: \_\_\_\_\_

Availability (# of days per year): \_\_\_\_\_

1. Please list your current or some of your past occupation(s):
2. What past volunteer experience have you had with other organization(s):
3. Provide a general statement about your desire to volunteer with Alberta Golf:
4. Please include the following with the application form: *(new applicants only)*

One letter of reference

☐

Package containing signed Alberta Golf policies

☐

Date: \_\_\_\_\_

Signature: \_\_\_\_\_

Return completed application form to: [info@albertagolf.org](mailto:info@albertagolf.org)

All applicants will be notified within 72 hours of their acceptance into the current year volunteer program.

Successful applicants will be required to complete a relevant Respect in Sport Program. Program details will be forwarded to all volunteers by Alberta Golf.



## Appendix E – Screening Disclosure Form [SCREENING POLICY]

**NAME:**

First

Middle

Last

**OTHER NAMES YOU HAVE USED:**

**CURRENT PERMANENT ADDRESS:**

Street

City

Province

Postal

**DATE OF BIRTH:**

Month/Day/Year

**GENDER IDENTITY:**

(Male, Female, Other, Prefer Not to Say)

**CLUB (if applicable):**

**EMAIL:**

*Note: Failure to disclose truthful information below may be considered an intentional omission and the loss of volunteer responsibilities or other privileges*

- 1. Have you been convicted of a crime? If so, please complete the following information for *each conviction*. Attach additional pages as necessary.**

Name or Type of Offense: *[FILLABLE FIELD]*

Name and Jurisdiction of Court/Tribunal: *[FILLABLE FIELD]*

Year Convicted: *[FILLABLE FIELD]*

Penalty or Punishment Imposed: *[FILLABLE FIELD]*

Further Explanation: *[FILLABLE FIELD]*

- 2. Have you ever been disciplined or sanctioned by a sport governing body or by an independent body (e.g., private tribunal, government agency, etc.) or dismissed from a coaching or volunteer position? If so, please complete the following information for each disciplinary action or sanction. Attach additional pages as necessary.**

Name of disciplining or sanctioning body: *[FILLABLE FIELD]*

Date of discipline, sanction or dismissal: *[FILLABLE FIELD]*

Reasons for discipline, sanction or dismissal: *[FILLABLE FIELD]*

Penalty or Punishment Imposed: *[FILLABLE FIELD]*

Further Explanation: *[FILLABLE FIELD]*



**3.** Are criminal charges or any other sanctions, including those from a sport body, privatetribunal or government agency, currently pending or threatened against you? If so, please complete the following information for each pending charge or sanction. Attach additional pages as necessary.

Name or Type of Offense: *[FILLABLE FIELD]*

Name and Jurisdiction of Court/Tribunal: *[FILLABLE FIELD]*

Name of disciplining or sanctioning body: *[FILLABLE FIELD]*

Further Explanation: *[FILLABLE FIELD]*

#### PRIVACY STATEMENT

By completing and submitting this Screening Disclosure Form, I consent and authorize Golf Canada and/or Alberta Golf and/or Member Club to collect, use and disclose my personal information, including all information provided on the Screening Disclosure Form as well as my Enhanced Police Information Check and/or Vulnerable Sector Check (when permitted by law) for the purposes of screening, implementation of the *Screening Policy*, administering membership services, and communicating with National Sport Organizations, Provincial/Territorial Sport Organizations, Clubs, and other organizations involved in the governance of sport. Alberta Golf does not distribute personal information for commercial purposes.

#### CERTIFICATION

I hereby certify that the information contained in this Screening Disclosure Form is accurate, correct, truthful and complete.

I further certify that I will immediately inform Alberta Golf of any changes in circumstances that would alter my original responses to this Screening Disclosure Form. Failure to do so may result in the withdrawal of volunteer responsibilities or other privileges and/or disciplinary action.

NAME (print): \_\_\_\_\_ DATE: \_\_\_\_\_

SIGNATURE: \_\_\_\_\_



## Appendix F – Screening Renewal Form [SCREENING POLICY]

NAME:

First

Middle

Last

CURRENT PERMANENT ADDRESS:

Street

City

Province

Postal

DATE OF BIRTH: \_

Month/Day/Year

GENDER IDENTITY: \_\_\_\_\_

(Male, Female, Other, Prefer Not to Say)

EMAIL: \_\_\_\_\_ PHONE: \_\_\_\_\_

By signing this document below, I certify that there have been no changes to my criminal record since I last submitted an Enhanced Police Information Check and/or Vulnerable Sector Check and/or Screening Disclosure Form and/or Driver's Abstract ("Personal Document") to Alberta Golf. I further certify that there are no outstanding charges and warrants, judicial orders, peace bonds, probation or prohibition orders, or applicable non-conviction information, and there have been no absolute and conditional discharges.

I agree that any Personal Document that I would obtain or submit on the date indicated below would be no different than the last Personal Document that I submitted to Alberta Golf. I understand that if there have been any changes, or if I suspect that there have been any changes, it is my responsibility to obtain and submit a new Personal Document to Alberta Golf's Screening Committee instead of this form.

I recognize that if there have been changes to the results available from any Personal Document and if I submit this form improperly, then I am subject to disciplinary action and/or the removal of volunteer responsibilities or other privileges at the discretion of the Screening Committee.

NAME (print): \_\_\_\_\_

DATE: \_\_\_\_\_

SIGNATURE: \_\_\_\_\_



## Appendix G – Volunteer Orientation and Training Acknowledgement Form

### [SCREENING POLICY]

1. I have the following role(s) with Alberta Golf (circle as many as apply):

Parent / Guardian

Coach

Director / Volunteer

Athlete

Official

Committee Member

2. As an individual affiliated with Alberta Golf, I acknowledge I have received and completed the following orientation and training:

Name of Training or Orientation:

Instructor: \_\_\_\_\_ Date Completed:

Name of Training or Orientation:

Instructor: \_\_\_\_\_ Date Completed:

Name of Training or Orientation:

Instructor: \_\_\_\_\_ Date Completed:

Name: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_



## Appendix H – Request For Vulnerable Sector Check [SCREENING POLICY]

*Note: Alberta Golf must modify this letter to adhere to any requirements from the VSC provider*

### INTRODUCTION

Alberta Golf is requesting a Vulnerable Sector Check for \_\_\_\_\_ [insert individual's full name] who identifies as a \_\_\_\_\_ (Male, Female, Other, Prefer Not to Say) and who was born on \_\_\_\_\_.

### DESCRIPTION OF ORGANIZATION

Alberta Golf is the not-for-profit provincial sport organization (PSO) for Golf in Alberta representing 45,000 members at more than 175 golf facilities.

### DESCRIPTION OF ROLE

\_\_\_\_\_ [insert individual's name] will be acting as a \_\_\_\_\_ [insert individual's role].

In this role, the individual will have access to vulnerable individuals.

[Insert additional information re: type and number of vulnerable individuals, frequency of access, etc.]

### CONTACT INFORMATION

If more information is required from Alberta Golf, please contact the Screening Committee Chair.

Name: \_\_\_\_\_

Signed: \_\_\_\_\_

Date: \_\_\_\_\_



## APPENDIX I – COMPLAINANT REPORT FORM *[WHISTLEBLOWER POLICY]*

The following form is recommended for use to Report under the terms of the Whistleblower Policy of Alberta Golf.

Name: \_\_\_\_\_

(Enter “Confidential” should you wish to submit a confidential Report)

Email Address: \_\_\_\_\_

Telephone: \_\_\_\_\_

Role or Position with Alberta Golf: \_\_\_\_\_

Description of Issue or Description of alleged Wrongdoing:

Other parties involved in the issue (with contact information, if known):

Do you wish to have the recipient keep your identity confidential?