**ST. LAWRENCE ROWING CLUB**

**SAFE SPORT POLICY MANUAL**

# Introduction

ST. LAWRENCE ROWING CLUB has a fundamental obligation and responsibility to protect the health, safety and physical and mental well-being of every Individual that is involved in its rowing community.

ST. LAWRENCE ROWING CLUB takes any situation involving misconduct or Maltreatment very seriously; for this reason, ST. LAWRENCE ROWING CLUB is committed to enacting and enforcing strong, clear, and effective policies and processes for preventing and addressing all forms of misconduct or Maltreatment.

This ST. LAWRENCE ROWING CLUB Safe Sport Manual contains policies for its rowing community. The policies are intended to promote a safe sport environment in a manner that allows for consistent, immediate, appropriate and meaningful action should any issues arise, but also to prevent issues from arising by communicating expected standards of behaviour to all participants.

This Safe Sport Manual has been prepared by RCA and has been adopted by ST. LAWRENCE ROWING CLUB as the applicable safe sport policies at the club.

Should any individuals involved with rowing programs, including Athletes, coaches, umpires, officials, volunteers, and parents/guardians of Athletes, wish to Report any instance of misconduct or Maltreatment, it must do so directly to RCA’s Independent Third Party, who will then determine the appropriate forum and manner to address the complaint.

ST. LAWRENCE ROWING CLUB also recognizes the recent development of the Universal Code of Conduct to Prevent and Address Maltreatment in Sport UCCMS). The UCCMS may continue to evolve in the foreseeable future, and this ST. LAWRENCE ROWING CLUB Safe Sport Policy Manual incorporates the key elements of the current version of the UCCMS in order to ensure that any of the unacceptable behaviour described in the UCCMS is incorporated herein and is applicable to ST. LAWRENCE ROWING CLUB’s rowing community. Going forward, this ST. LAWRENCE ROWING CLUB Safe Sport Policy Manual may be amended further if modifications are made to the UCCMS to ensure that the UCCMS is fully incorporated by ST. LAWRENCE ROWING CLUB and can be implemented appropriately. In the event that the UCCMS is modified before amendments are made to this ST. LAWRENCE ROWING CLUB Safe Sport Manual, any such modifications shall be incorporated in this ST. LAWRENCE ROWING CLUB Safe Sport Manual by reference.

Certain policies found in this Safe Sport Manual also apply to matters beyond safe sport i.e., the Appeal Policy). As such, these policies will also be published on ST. LAWRENCE ROWING CLUB’s website so that they are accessible and applicable in all relevant areas.

Lastly, RCA notes and wishes to advise the Canadian rowing community that, if any Policy, in whole or in part, is excerpted from this Safe Sport Manual, any such action must be taken with the knowledge, and disclosure to any receiving party, that the Policy is part of the Safe Sport Manual, which may impact its application or understanding.

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| **ST. LAWRENCE ROWING CLUB** DEFINITIONS |
| ***The terms defined below shall apply to all policies included in this ST. LAWRENCE ROWING CLUB Safe Sport Manual.*** |

* 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 under the *Appeal Policy*.
  2. “*Appellant*” – The Party appealing a decision pursuant to the *Appeal Policy*.
  3. “*Appeal Manager*” – An individual appointed by RCA or a Provincial Rowing Association who may be any staff member, committee member, volunteer, Director, or an independent third party, to oversee the administration of the *Appeal Policy*. The Appeal Manager’s responsibilities shall include those as described in the *Appeal Policy*.
  4. *“Athlete”* – includes any Individual who is registered with ST. LAWRENCE ROWING CLUB for either recreational or competitive purposes.
  5. *“Board*” – the Board of Directors of ST. LAWRENCE ROWING CLUB.
  6. *“Case Manager”* – an independent individual appointed by RCA or a Provincial Rowing Association, as applicable, to fulfill the responsibilities described in the *Harassment, Discipline and Complaints Policy*. In order to be appointed as a Case Manager, the individual must have relevant experience and skills to manage complaints and perform their duties, either as a legal practitioner or sport administrator.
  7. “*Complainant*” – the Party making a complaint pursuant to the *Harassment, Discipline and Complaints Policy* and as referred to in Row Ontario’s *Investigations Policy*.
  8. *“Complaint Resolution Officer”* – an individual appointed to handle the duties of the Complaint Resolution Officer as described in the *Harassment, Discipline and Complaints Policy*.
  9. “*Criminal Record Check CRC)*” – A search of the RCMP Canadian Police Information Centre CPIC) system for adult convictions
  10. “*Days*” – calendar days. For the purpose of calculating deadlines in this Safe Sport Policy Manual, days excludes weekends and public holidays, and the day of the act/decision is not counted as the first day of any deadline.
  11. “*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.
  12. “*Event*” – An event sanctioned by RCA or a Rowing Organization, including ST. LAWRENCE ROWING CLUB, and which may include a social Event.
  13. “*Harassment*” – A vexatious comment or comments) or conduct against an Individual or group, irrespective of whether the comment or conduct occurs in person or via any other media, including Social Media, which is known or ought to reasonably be known to be unwelcome. Types of behaviour that constitute Harassment include, but are not limited to:
      1. Written or verbal abuse, threats, or outbursts;
      2. Persistent unwelcome remarks, jokes, comments, innuendo, or taunts;
      3. 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;
      4. Leering or other suggestive or obscene gestures;
      5. Condescending or patronizing behaviour which is intended to undermine self-esteem, diminish performance or adversely affect working conditions;
      6. Practical jokes which endanger a person’s safety, or which may negatively affect performance;
      7. Hazing, which is any form of conduct which exhibits any potentially humiliating, degrading, abusive, or dangerous activity, which does not contribute to any Individual’s positive development, but is required to be accepted as part of a team or group, regardless of the 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;
      8. Unwanted physical contact including, but not limited to, touching, petting, pinching, or kissing;
      9. Deliberately excluding or socially isolating a person from a group or team;
      10. Persistent sexual flirtations, advances, requests, or invitations;
      11. Physical or sexual assault;
      12. 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
      13. Retaliation or threats of retaliation against a person who Reports harassment to RCA or to a Rowing Organization.
  14. “*Independent Third Party*” – the independent individual retained by RCA to receive complaints and to fulfill the responsibilities outlined in the *Harassment, Discipline and Complaints Policy* and *Investigations Policy – Discrimination, Harassment and Maltreatment*, as applicable.
  15. “*Individuals*”– refers to all categories of members and/or registrants defined in the Bylaws of ST. LAWRENCE ROWING CLUB, as well as all people employed by, contracted by, or engaged in activities with ST. LAWRENCE ROWING CLUB including, but not limited to, employees, contractors, Athletes, coaches, umpires, officials, volunteers, managers, administrators, parents or guardians, spectators, Committee members or Directors or Officers
  16. “*Maltreatment*” – any volitional act by an Individual that results in harm or the potential for physical or psychological harm to another Individual, and includes any of the following behaviours or conduct:
      1. Psychological Maltreatment: any pattern or single serious incident of deliberate conduct that has the potential to be harmful to the psychological well-being of an Individual. Psychological Maltreatment is determined by the objective behaviour, and not whether harm is intended or results from the behaviour. It includes:
  17. Verbal Acts: verbally assaulting or attacking an Individual, including but not limited to unwarranted personal criticisms; body shaming; derogatory comments related to an Individual’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 an Individual to diminish their reputation; using confidential sport and non-sport information inappropriately. Verbal Maltreatmentmay also occur in online forms.
  18. Non-assaultive Physical Acts no physical contact): physically aggressive behaviours, 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.
  19. Acts that Deny Attention or Support: acts that deny attention, lack of support or isolation including but not limited to ignoring psychological needs or socially isolating an Individual repeatedly or for an extended period of time; abandonment of an Athleteas 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.

1. Physical Maltreatment: any pattern or single serious incident of deliberate conduct that has the potential to be harmful to the physical well-being of an Individual. Physical Maltreatment is determined by the objective behaviour, and not whether harm is intended or results from the behaviour. It includes, without limitation:
   1. Contact behaviours: including but not limited to deliberately punching, kicking, beating, biting, striking, strangling or slapping another; and deliberately hitting another with objects;
   2. Non-contact behaviours: including but not limited to isolating an Individual in a confined space; forcing an Individual to assume a painful stance or position for no athletic purpose e.g., requiring an Athleteto 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 an Individual under the legal drinking age; providing illegal drugs or non-prescribed medications to an Individual; encouraging or knowingly permitting an Athlete to return to training or on the water 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.
2. Sexual Maltreatment, including, but not limited to, any act targeting an Individual’s sexuality, gender identity or expression, that is committed, threatened or attempted against that 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 Maltreatmentalso includes sexual harassment and stalking, cyber harassment, and cyber stalking of a sexual nature.
   1. Examples of Sexual Maltreatment include, but are not limited to:
      1. 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:
         1. vaginal penetration by a penis, object, tongue, or finger; and
         2. anal penetration by a penis, object, tongue, or finger.
      2. 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:
         1. kissing;
         2. intentional touching of the breasts, buttocks, groin or genitals, whether clothed or unclothed, or intentionally touching of another with any of these body parts;
         3. any contact, no matter how slight, between the mouth of one person and the genitalia of another person, and
         4. making another touch themselves, the Individual, or someone else with or on any of the body parts listed in 2).
         5. any intentional touching in a sexualized manner of the relationship, context or situation.
3. Neglect: any pattern or a single serious incident of lack of reasonable care, inattention to an Individual’s needs, nurturing or well-being, or omissions in care. Neglectis determined by the objective behaviour but the behaviour must be evaluated with consideration given to the Individual’sneeds and requirements, not whether harm is intended or results from the behaviour.
   1. Neglect*,* or acts of omission, include without limitation, not providing an Athleterecovery 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 Athleteduring travel, training or competition; not considering the welfare of the Athlete when prescribing dieting or other weight control methods e.g., caliper tests); disregarding the use of Prohibited Substances or Methods by an Athlete; failure to ensure safety of equipment or environment; allowing an Athleteto disregard sport rules, regulations, and standards, subjecting Individualsto the risk of Maltreatment.
4. Grooming: includes, without limitation, deliberate conduct by an Individual to sexualize a relationship with a Minor, and which includes 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 participantssharing rooms with a Minorwho 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).
5. Interference with or Manipulation of Process
   1. An adult Individual violates the *Code of Conduct and Ethics* by directly or indirectly interfering with a process instituted pursuant to the *Code* or the process of ST. LAWRENCE ROWING CLUB, RCA or Rowing Organization instituted pursuant to any other policy, including the policies found in the ST. LAWRENCE ROWING CLUB Safe Sport Policy Manual, by:
      1. falsifying, distorting, or misrepresenting information, the resolution process, or an outcome;
      2. destroying or concealing information;
      3. attempting to discourage an Individual’s proper participation in or use of ST. LAWRENCE ROWING CLUB, RCA or another Rowing Organization’s processes;
      4. harassing or intimidating verbally or physically) any person involved in ST. LAWRENCE ROWING CLUB, RCA or another Rowing Organization’s processes before, during, and/or following any proceedings;
      5. publicly disclosing an Individual’s identifying information, without the Individual’s agreement;
      6. failing to comply with any temporary or provisional measure or other final sanction;
      7. distributing or otherwise publicizing materials an Individual gains access to during any investigation or hearing, except as required by law or as expressly permitted; or
      8. influencing or attempting to influence another Individual to interfere with or manipulate the process.
6. Retaliation: An Individual shall not take an adverse action against any other Individual for making a good faith Reportof possible Maltreatmentor for participating in any process found in RCA or a Rowing Organization’s policies, including those found in this ST. LAWRENCE ROWING CLUB Safe Sport Policy Manual. Retaliation includes threatening, intimidating, harassing, coercing or any other conduct that would discourage a reasonable person from engaging or participating in ST. LAWRENCE ROWING CLUB, RCA or another Rowing Organization’s processes. Retaliation after the conclusion of investigation and sanction processes is also prohibited. Retaliation may be present even where there is a finding that no Maltreatmentoccurred and does not include good-faith actions lawfully pursued in response to a Reportof possible Maltreatment*.*
7. Aiding and abetting:
   1. any act taken with the purpose of facilitating, promoting, or encouraging the commission of Maltreatmentby an Individual. Aiding and abetting also includes, without limitation, knowingly:
      1. allowing any person who has been suspended or is otherwise ineligible to be in any way associated with sport or to coach or instruct Individuals;
      2. providing any coaching-related advice or service to an Athletewho has been suspended or is otherwise ineligible; and
      3. allowing any Individual to violate the terms of their suspension or any other sanctions imposed.
8. Failure by an adult Individual to Report actual or suspected Maltreatment of a Minor. This obligation is ongoing and is not satisfied by making an initial Report; instead, this obligation includes Reporting to the Independent Third Party, on a timely basis, all relevant information that the adult Individual is or becomes aware of, and requires making a direct Report to the Independent Third Party. Any Report shall include the personally identifying information of the potential Minor complainant to the extent known), and any such information learned at a later date.
9. Failure to Report inappropriate conduct: Any Individualwho suspects or becomes aware of another Individual’sinappropriate conduct, even if it is not defined as Maltreatment, has a duty to Report such inappropriate conduct to the Independent Third Party. Persons in Authority who become aware of another Individual’s inappropriate conduct have a responsibility for Reporting the concern to the Independent Third Party.
10. Intentionally filing a false allegation. An allegation is false if the events or conduct reported did not occur and the Individual making the Report knows that the events or conduct did not occur. An individual shall not be considered to have filed a false allegation in cases where the allegation cannot be substantiated by supporting evidence but was nevertheless filed in good faith.
    1. “*Minor*” – any Individual who is under the age of eighteen 18) at the time when the alleged breach of ST. LAWRENCE ROWING CLUB, RCA or any other Rowing Organization’s policy has occurred. Adult Individuals are responsible for knowing the age of a Minor.
    2. “*Parties*” – in the context of a complaint under the *Harassment, Discipline and Complaints Policy*, the Complainant and Respondent; in the context of an appeal under the *Appeal Policy*, the Appellant, Respondent and Affected Party or Parties).
    3. “*Person in Authority*” – Any Individual who holds a position of authority within RCA or a Rowing Organization, including, but not limited to, coaches, umpires, officials, managers, support personnel, chaperones, Committee members, and Directors or Officers. In addition to the responsibilities described for Individuals in the Code of Conduct and Ethics, a Person in Authority shall be responsible for knowing what constitutes Maltreatment.
    4. *“Power Imbalance”* - A Power Imbalancemay exist where, based on the totality of the circumstances, an Individual has supervisory, evaluative, a duty of care, or other authority over another Individual*.* A Power Imbalancemay also exist between an Athleteand 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. Maltreatmentoccurs when this power is misused. Once a coach-Athleterelationship is established, a Power Imbalanceis presumed to exist throughout the coach-Athleterelationship, regardless of age, and is presumed to continue for Minor Athletesafter the coach-Athleterelationship terminates or until the Athletereaches 25 years of age. A Power Imbalancemay 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).
    5. “*Reporting or Report)*” - The provision of information in writing by any person or an Individual to a relevant independent authority the Independent Third Party or position charged with receiving a Report and determining next steps) regarding Maltreatment. Reportingmay occur through either: i) the Complainantof any age) or the one who experienced the Maltreatment, or ii) a witness – someone who witnessed the Maltreatmentor otherwise knows or suspects Maltreatment. In either case, the intention of Reportingis to initiate an independent investigative process, which could result in disciplinary action being taken against the Respondent.
    6. *“Respondent”* – the Party responding to a complaint or investigation; or, in the case of an appeal, the body or organization whose decision is being appealed, or the Individual who was the subject of a decision that is being appealed.
    7. “*Rowing Organization*” – an organization that provides programmes, facilities or events to Individuals participating in the sport of rowing on a local, regional or national level in Canada, and which includes Rowing Clubs,[[1]](#footnote-1) Special Associations and Provincial Rowing Associations.
    8. “*Sexual Harassment*” – A vexatious comment or comments) or conduct against an Individual because of sex, sexual orientation, gender identity or gender expression, where the course of comment or conduct is known or ought reasonably to be known to be unwelcome; or making a sexual solicitation or advance where the person making the solicitation or advance is in a position to confer, grant or deny a benefit or advance to the Individual and the person knows or ought reasonably to know that the solicitation or advance is unwelcome. Types of behaviour that constitute Sexual Harassment include, but are not limited to:
       1. Sexist jokes;
       2. Threats, punishment, or denial of a benefit for refusing a sexual advance;
       3. Offering a benefit in exchange for a sexual favour;
       4. Demanding hugs;
       5. Bragging about sexual ability;
       6. Leering persistent sexual staring);
       7. Sexual assault;
       8. Display of sexually offensive material;
       9. Distributing sexually explicit messages or attachments such as pictures or video files;
       10. Sexually degrading words used to describe an Individual;
       11. Unwelcome inquiries into or comments about an Individual’s gender identity or physical appearance;
       12. Inquiries or comments about an Individual’s sex life;
       13. Persistent, unwanted attention after a consensual relationship ends;
       14. Persistent unwelcome sexual flirtations, advances, comments or propositions; and
       15. Persistent unwanted contact.
    9. “*Social Medium Social Media)”* – A form of electronic communication including websites for social networking and microblogging such as blogs, YouTube, Facebook, Instagram, Tumblr, Snapchat, Tik-Tok, and Twitter. Social Media is the plural of Social Medium representing all the platforms broadly.
    10. “*Vulnerable Individuals*” – Includes Children / Youth 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 a Person in Authority);
    11. “*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
    12. “*Workplace*” - Any place where Events, business or work-related activities are conducted. Workplaces include but are not limited to, the office or facilities of ST. LAWRENCE ROWING CLUB, work-related social functions, work assignments outside offices, work-related travel, the training and competition environment wherever located), and work-related conferences or training sessions
    13. *“Workplace Harassment”* – Vexatious comments) 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:
        1. Bullying;
        2. Workplace pranks, vandalism, bullying or hazing;
        3. Repeated offensive or intimidating phone calls, text messages or emails;
        4. Inappropriate sexual touching, advances, suggestions or requests;
        5. Displaying or circulating offensive pictures, photographs or materials in printed or electronic form;
        6. Psychological abuse;
        7. Excluding or ignoring someone, including persistent exclusion of a person from work-related social gatherings;
        8. Deliberately withholding information that would enable a person to do his or her job, perform or train;
        9. Sabotaging someone else’s work or performance;
        10. Gossiping or spreading malicious rumours;
        11. Intimidating words or conduct offensive jokes or innuendos); and
        12. Words or actions which are known or should reasonably be known to be offensive, embarrassing, humiliating, or demeaning.
    14. “*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:

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

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| **ST. LAWRENCE ROWING CLUB** ATHLETE PROTECTION POLICY |

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| --- | --- |
| Effective date | March 24, 2022 |
| Archived date |  |
| Date last reviewed | March 24, 2022 |
| Scheduled review date | March 24, 2023 |
| Replaces and/or amends |  |
| Approved by and date | March 24, 2022 |
| Appendix-ces) to this Policy | Image Consent Form  Procedures for Reporting Maltreatment of Minor |

**Purpose**

1. This Athlete Protection Policy describe how Persons in Authority shall maintain a safe sport environment for all Athletes.

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

1. ST. LAWRENCE ROWING CLUB strongly recommends the ‘Rule of Two’ for all Persons in Authority who interact with Athletes, whether in person or remotely i.e., in virtual settings). The Coaching Association of Canada describes the intention of the ‘Rule of Two’ as follows:

A coach must never be alone or out of sight with a minor athlete. Two NCCP trained or certified coaches should always be present with an athlete, especially a minor athlete, when in a potentially vulnerable situation such as in a locker room or meeting room. All one-on-one interactions between a coach and an athlete must take place within earshot and in view of a second coach except for medical emergencies. One of the coaches must also be of the same gender as the athlete. Should there be a circumstance where a second screened and NCCP trained or certified coach is not available, a screened volunteer, parent, or adult can be recruited.

1. ST. LAWRENCE ROWING CLUB recognizes that fully implementing the ‘Rule of Two’, as described above and modified accordingly for Persons in Authority), in all circumstances, may not always be possible. Consequently, at a minimum, interactions between Persons in Authority and Athletes must respect the following:
   * 1. The training and competition environments should be open to observation so that all interactions between Persons in Authority and Athletes are observable.
     2. Private or one-on-one situations must be avoided unless they are open and observable by another adult or Athlete.
     3. Persons in Authority shall not invite or have a Vulnerable Individual or Vulnerable Individuals) in their home without the written permission and contemporaneous knowledge of the Vulnerable Individual's parent or guardian.
     4. Vulnerable Individuals must not be in any situation where they are alone with a Person in Authority without another screened adult or Athlete present unless prior written permission is obtained from the Athlete’s parent or guardian

**Practices and Events**

1. As it relates to practices and/or competitions, the following shall be respected:
2. A Person in Authority should never be alone with a Vulnerable Individual prior to or following a competition or practice unless the Person in Authority is the Athlete’s parent or guardian.
3. If the Vulnerable Individual is the first Athlete to arrive, the Athlete’s parent should remain until another Athlete or Person in Authority arrives.
4. If a Vulnerable Individual would potentially be alone with a Person in Authority following a competition or practice, the Person in Authority should ask another Person in Authority or a parent or guardian of another Athlete) to stay until all of the Athletes have been picked up. If an adult is unavailable, another Athlete, who is preferably not a Vulnerable Individual, should be present in order to avoid the Person in Authority being alone with a Vulnerable Individual
5. Persons in Authority giving instructions, demonstrating skills, or facilitating drills or lessons to an individual Athlete should always do so within earshot and eyesight of another Person in Authority
6. If there is a concern with observing the Rule of Two, Persons in Authority and Athletes should take additional steps to achieve transparency and accountability in their interactions.

**Communications**

1. Communications between Persons in Authority and Athletes shall respect the following:
2. Group messages, group emails or team pages are to be used as the regular method of communication between Persons in Authority and Athletes
3. Persons in Authority may only send personal 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). Any such texts, messages or emails shall be professional in tone and must be copied to another adult when the Athlete is a Vulnerable Individual.
4. No personal texts between Vulnerable Individuals and Persons in Authority may be sent; however, if this is necessary under Section 5b), it shall include one other adult person on the message preferably the Vulnerable Person’s parents)/guardians)).
5. Parents and guardians may request that their child not be contacted by a Person in Authority using any form of electronic communication and/or to request that certain information about their child may not be distributed in any form of electronic communications
6. All communication between a Person in Authority and Athletes must be between the hours of 6:00am and 11:00pm unless extenuating circumstances justify otherwise e.g., cancelling an early morning practice)
7. Communications concerning drugs or alcohol use unless regarding its prohibition) is not permitted
8. No sexually explicit language or imagery or sexually oriented conversation may be communicated by any medium
9. Persons in Authority and Athletes are not permitted to offer or ask one another to keep a secret for them

**Virtual settings**

1. The Rule of Two shall apply to all Minors in a virtual environment. Specifically:
2. For Athletes under the age of 16, where possible, a parent/guardian should be present during any virtual session;
3. Two adult coaches should be present or one coach and one adult parent, guardian, volunteer, club administrator). One-on-one virtual sessions are prohibited;
4. Coaches shall be informed by ST. LAWRENCE ROWING CLUB, as applicable, of the expected standards of conduct during virtual sessions;
5. Parents/guardians of Minors shall be informed by ST. LAWRENCE ROWING CLUB of the activities that will take place during the virtual session, as well as the process of the virtual session;
6. Parents/guardians of Minors shall provide consent to the Minor participating in the virtual session, if irregularly scheduled, or prior to the first session if the sessions will take place on a regular basis;
7. Communications during virtual sessions shall take place in an open and observable environment. Sessions must be initiated in appropriate locations i.e., not in personal or inappropriate locations such as bedrooms);
8. Virtual sessions should be recorded whenever allowed by the technology being used;
9. Parents/guardians should debrief with Minors on a weekly basis regarding virtual sessions.

**Travel**

1. Any travel involving Persons in Authority and Athletes shall respect the following:
2. Teams or groups of Athlete shall always have at least two Persons in Authority with them
3. For mixed gender teams or groups of Athletes, there will be one Person in Authority from each gender
4. Screened parents or other volunteers will be available in situations when two Persons in Authority cannot be present
5. No Person in Authority may drive a vehicle with an Athlete alone unless the Person in Authority is the Athlete’s parent or guardian
6. A Person in Authority may not share a room or be alone in a hotel room with an Athlete unless the Person in Authority is the Athlete’s parent or guardian
7. Room or bed checks during overnight stays must be done by two Persons in Authority
8. For overnight travel when Athletes must share a hotel room, roommates will be age-appropriate and, for Minors, shall be within two years of age of one another and of the same gender identity

**Locker Room / Changing Areas**

1. The following shall apply to locker rooms, changing areas, regatta weigh-in areas), and meeting rooms:
2. Interactions i.e., conversation) between Persons in Authority and Athletes should not occur in any room where there is a reasonable expectation of privacy such as a locker room, regatta weigh-in areas), restroom or changing area. A second adult should be present for any necessary interaction between an adult and an Athlete in any such room. The Rule of Two must be respected.
3. If Persons in Authority are not present in the locker room or changing area, or if they are not permitted to be present, they should still be available outside the locker room or changing area and be able to enter the room or area if required, including but not limited to team communications and/or emergency

**Photography / Video**

1. Any photograph or video involving Athletes shall respect the following:
2. Photographs and video may only be taken in public view, must observe generally accepted standards of decency, and be both appropriate for and in the best interest of the Athlete.
3. The use of recording devices of any kind in rooms where there is a reasonable expectation of privacy is strictly prohibited.
4. Examples of photos that shall be edited or deleted include:
5. Images with misplaced apparel or where undergarments are showing
6. Suggestive or provocative poses
7. Embarrassing images
8. If any photographs or videos will be used on any form of public media, an Image Consent Form must be completed before any images are taken and used

**Physical Contact**

1. It is recognized that 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. Any physical contact shall respect the following:
2. Unless it is otherwise impossible because of serious injury or other justifiable circumstance, a Person in Authority must always clarify with an Athlete where and why any physical contact will occur prior to the contact occurring. The Person in Authority must make clear that he or she is requesting to touch the Athlete and not requiring physical contact
3. Infrequent, non-intentional physical contact during a training session is permitted
4. Hugs lasting longer than five seconds, cuddling, physical horseplay, and physical contact initiated by the Pe[rson in Authority is not permitted. It is recognized that some Athletes may initiate hugging or other physical contact with a Person in Authority for various reasons e.g., such as crying or celebrating after a performance), but this physical contact may only occur in an open and observable environment.

**Enforcement**

1. Any alleged violations of this *Athlete Protection Policy* shall be addressed pursuant to ST. LAWRENCE ROWING CLUB’s *Harassment, Discipline and Complaints Policy*.

**Privacy**

1. The collection, use and disclosure of any personal information pursuant to this Policy is subject to ST. LAWRENCE ROWING CLUB’s Privacy Policy.

1. Wherever the term ‘Club’ is used in any policy included in this policy manual, it shall be understood as a Special Association where appropriate and required by the circumstances. [↑](#footnote-ref-1)