

Soccer Nova Scotia Policies, Procedures & Code of Conduct Best Practice

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‘Policies are used by an organization to manage the operations and determine how an organization makes decisions which affect people.’

Good policies are:

- Essential to everything an organization is and does
- A vital element of risk management and quality assurance
 - Good governance begins with ensuring that the necessary governing documents are in place and work effectively
- Necessary for successful operations and focus on risk management

Written policies and procedures:

- Reflect and support the basic developmental needs of children
- Help ensure children receive a safe and quality experience
- Provide a strong reference point for staff and volunteers when they are in doubt about what to do in a given situation
- Reduce the variance in practices that can occur when policies do not exist and limit the range of interpretation when policies and procedures are “known” by personnel but are not formalized in writing

How to create new policies and procedures or update existing ones

Preparation – Collect current information and analyze current situations

- Preparation is one of the most important elements in the policy review process
- It requires you to scan your organization, gather copies of all existing policies and procedures, and identify what is currently being implemented and what is not

Examine – Examine ways to improve

- Once you have identified policies and procedures where awareness is weak or adherence is non-compliant, it is necessary to examine ways to improve
- At this point you can ask yourself several key questions:
 - How are policies and procedures currently communicated to personnel? (E.g. through program manuals, job descriptions, meetings)
 - Where are the weak links in the communication process?
 - How are personnel trained to understand and correctly apply policies and procedures? (E.g. with the help of handbooks, written tests, periodic refresher sessions)

- What supervision methods are used to ensure understanding and compliance? (E.g. through observing programs and/or reviewing accident reports and serious occurrence reports) Are these methods effective?
- What happens when awareness of policies and procedures is weak, or non-compliance is found in the system?
- To what extent are parents and children aware of policies and procedures?

Create - Write policies and procedures

There are five essential rules of policy writing:

- **Be clear** – write the policy in plain language so that is understandable to everyone. Make it a practice of having an outsider review a draft of a written policy, to see if they understand it. If someone from outside the organization can understand the document, then likely most of the organization’s managers, staff, members and participants will also.
- **Be concise** – don’t use three words where one will do. Writing concisely takes effort and time, but the end product is well worth it.
- **Be consistent** – terms and phrases must be used consistently throughout a policy document. For example, if the policy refers to “programs” in one section, don’t use a different term such as “event” in another. A policy must be absolutely consistent in its use of terms, as lack of consistency will often lead to disputes.
- **Be complete** – the policy must anticipate every circumstance and must cover every aspect of an issue. There cannot be gaps, holes or loose ends. The policy must cover procedural steps from the beginning to the end.
- **Be friendly to the reader** – clarity, conciseness and consistency will make a policy easier to understand, but the format and layout will make it easier to read. Use titles, headings, subheadings, and bullet point lists wherever possible.

It is recommended each policy contain these elements:

The Policy Statement

Your organization’s position on the issue and what you will do in the given situation.

The Purpose of the Policy

What will be achieved by the policy and why it was created.

Why Is This Policy Important?

Understanding why a recommended action is significant is a key component of adult learning. This section helps program personnel connect the action plan to the basic developmental needs of children. It provides personnel with a base for explaining the policy to others involved in implementing the policy and living by it (E.g. leaders, children, parents).

Club Licence Quality Soccer Provider & Quality Soccer Provider & PTSO Level 1 Policies & Procedure Requirements

Background Screening Policy

SAMPLE POLICY STATEMENT

Leader candidates and other identified staff candidates who could have contact with, or access to, children and/or vulnerable individuals in their roles, must submit a “clear” Vulnerable Sector (VS) verification check report prior to commencing work in services involving children.

PURPOSE

To mitigate the risk of placing children in the care of individuals with a history of inappropriate or dangerous behaviour with children. Pursuant to the Criminal Records Act, VS screening was established to provide screening of individuals who intend to work or volunteer with the vulnerable sector.

WHY IS THIS POLICY IMPORTANT?

A Vulnerable Sector police record check will identify if a leader candidate has a history of crime against children or vulnerable others. Requesting a clear VS check demonstrates due diligence towards keeping children safe from physical and sexual abusers. Screening for clearance to work with vulnerable populations may reduce the chance of putting children at risk or into the care of individuals who may have had prior convictions related to the care of children.

PROCEDURE

A] The process

Indicate in all recruitment promotional materials that candidates will be required to submit a disclosure statement regarding any prior convictions and also submit to a VS police record check regarding any criminal activity involving children or vulnerable individuals. Note: in order to provide adequate time and compliance with this process, the following should be considered:

- Utilizing a commercial service provider with RTID technology (Real Time I.D.) to conduct VS police background checks as they can often conduct these in a condensed timeframe using electronic scanning of fingerprints rather than a scan of a paper-based product
- Fingerprinting may be a requirement of the checking process and this can take up to 120 days for verification, so it may be prudent to schedule recruitment and hiring to

accommodate this process

- Fingerprinting processes, if required, will have an additional charge associated with the service
- Staff should be directed to visit the Royal Canadian Mounted Police website www.rcmp-grc.gc.ca/cr-cj/fing-empr2-eng.htm

B] Evidence: We are following the policy if...

- All team personnel and designated staff submit completed Vulnerable Sector verifications, prior to commencing employment

C] Communication: Who should know about this policy? How will they be informed?

- All team personnel should be aware of this policy and it should be reinforced through recruitment and training programs and related materials
- Parents/legal guardians/caregivers should be made aware of this policy in parent handbooks, on parent bulletin boards and on the organization's website
- It is also important to advise all applicants of the following information from the Royal Canadian Mounted Police (RCMP) website: www.rcmp-grc.gc.ca

D] How to support the policy – success factors to consider:

- Commence the recruitment process with sufficient lead time to promote available positions and enable candidates to process appropriate VS verifications as required
- Maintain current awareness of processes involved so as to ensure efficient direction of candidates and processing of background checks

***Note: Team personnel = Coaches, managers or any person interacting with children and/or vulnerable individuals**

Appropriately Trained and/or Certified Coach Policy

SAMPLE POLICY STATEMENT

Coaches will be placed based on the needs of the children, the number of children and the complexity of each program. Qualified and experienced coaches will supervise children in programs at all times.

PURPOSE

Minimum standards regarding child:leader ratios, qualifications, experience and maturity level of coaches need to be established for each program to ensure the safety and well-being of the children in the program.

WHY IS THIS POLICY IMPORTANT?

- Supervising children is an immensely important responsibility. Coaches need to be mature and experienced enough to properly handle difficult situations, such as emergencies, judgment calls about safety, serious conflicts among children and parent complaints. They also need to fully understand the Principles of healthy child development and how they are applied in children's programs.
- Coaches must possess the proper qualifications (E.g. a coaching certificate from Canada Soccer aligned to the stage & level of the program)

PROCEDURE

A] The process

- Assess each program to determine the developmental needs of the children, the level of risk involved, the complexity of the program, the number of required, and the calibre of leader that is necessary to guarantee a safe and quality experience for children
- Establish supervision and coaching standards and document them for each program to ensure that a safe number of mature, qualified and experienced coaches are in place. Evaluate standards regularly to determine whether they are effective in meeting the needs of children and are current with changes in the requirements of the program. In cases where a professional sport/activity governing body exists, standards may already be established and should be followed accordingly
- Consider the maturity level of a coaching candidate and his/her years of experience working with children when determining whether he/she is suitable for the position
- Request proof that coaching candidates have the required qualifications (E.g. Canada Soccer Coaching Certificate). Put copies in the candidate's personnel file
- Supervisor/administrator/president/administrator/presidents should review a candidate's personnel file prior to offering them a coaching position, to ensure that they meet the coaching standards for the program (Does their maturity level, qualifications and years and extent of experience qualify them for the position?)

- Supervisor/administrator/president/administrator/presidents should monitor registration and attendance numbers for programs to ensure that leader:child ratios are not exceeded
- Ask coaches to share information about their qualifications and experience with parents by writing a letter of introduction to parents at the start of the program session

B] Evidence: We are following the policy if...

- Policies and procedures manuals document the supervision and coaching standards established for each program type
- The results of screening processes are documented in each leader's personnel file. (E.g. references confirm the number of years of experience a candidate has acquired in working with children and swimming instructors have supplied photocopies of aquatic awards)

C] Communication: Who should know about this policy? How will they be informed?

- All coaches, presidents, administrators and managers should be aware of this policy and it should be reinforced through leader training programs and related materials
- Parents/legal guardians/caregivers should be made aware of this policy in parent handbooks, on parent bulletin boards and on the organization's website

D] How to support the policy – success factors to consider:

- Program policies and procedures manuals can be used to outline supervision and coaching standards for each and every program type. Such documents serve as a consistent reference for all personnel responsible for the selection, hiring, placement, training and supervision of staff and volunteers. The larger the organization, the more important policies and procedures manuals become
- Standards to be considered include supervision ratios and the minimum age, qualifications and experience requirements of coaches

Rule of Two Policy

SAMPLE POLICY

When a **[Insert the name of your organization here]** Coach, Volunteer Coach, Assistant Coach or Manager is in a potentially vulnerable situation with any child (example - locker room or meeting room), another **[Insert the name of your organization here]** Coach, Volunteer Coach, Assistant Coach, Manager or the parent/guardian of the player(s) must be present.

In any one-on-one situation with any **[Insert the name of your organization here]** child, there must be a Coach, Assistant Coach or Manager of the same gender present, or the player's parent/guardian must be present.

Note - This includes electronic devices such as SMS messaging and private chat applications.

PURPOSE

Ultimately, the Rule of Two states that there will always be two screened and NCCP trained or certified coaches with an athlete, especially a minor athlete, when in a potentially vulnerable situation. This means that any one-on-one interaction between a coach and an athlete must take place within earshot and view of the second coach, with the exception of medical emergencies.

WHY IS THIS POLICY IMPORTANT

The Rule of Two serves to protect minor athletes in potentially vulnerable situations by ensuring that more than one adult is present. Vulnerable situations can include closed doors meetings, travel, and training environments.

PROCEDURE

In the event where screened and NCCP trained or certified coaches are not available, a screened volunteer, parent, or adult can be recruited. In all instances, one coach/volunteer must reflect the genders of the athletes participating or be of an appropriate identity in relation to the athlete(s).

The following sequential list depicts the “staircase approach” to the Rule of Two. While the Gold Standard is the preferred environment, it is not expected that it will be reached at all times. The alternatives presented, although increasing risk, are acceptable and would be considered to be in alignment with the Rule of Two. The one-on-one interaction between a coach and an athlete without another individual present, as depicted at the lowest rank in the sequential list, is to be avoided in all circumstances.

1. Two certified coaches (Gold Standard)
2. One trained coach & one screened adult
3. One coach & two athletes
4. One coach & one player (Not to happen)

Child Sexual Abuse Training for Employees/Volunteers Policy

SAMPLE POLICY STATEMENT

All employees/volunteers shall receive training on child sexual abuse upon starting work with **[Insert the name of your organization here]** and annually thereafter.

PURPOSE

Understanding child sexual abuse is the first step towards prevention, as well as towards the creation of safer environments for children. It is important that all employees and volunteers learn about child sexual abuse and the difference between acceptable and unacceptable behaviour.

WHY IS THIS POLICY IMPORTANT?

Training for employees/volunteers includes:

- Understanding child sexual abuse
 - The importance of boundaries to foster healthy relationships between adults and children
 - The grooming process and inappropriate behaviours
 - Unlawful behaviour
 - What constitutes a child in need of protection or intervention
- Managing risk
- Reviewing the organization's child protection policies, including:
 - Code of Conduct to Protect Children
 - Reporting and documentation regarding potential unlawful behaviour and inappropriate behaviour

PROCEDURE

New employees/volunteers:

- Training occurs as soon as the employee/volunteer begins working and before s/he is entrusted with the protection and care of children.
- Training occurs within the employee/volunteer's probationary period.
- Training is conducted by **[insert position of the employee who will be conducting the training here (i.e. office manager, etc.)]**.

- Training may involve in-person group or individual training, and may include the provision of education materials to be reviewed on your own, with a subsequent opportunity to discuss the material in an individual or group setting.

Existing employees/volunteers:

- Training occurs when **[Insert the name of your organization here]** introduces new information about child protection or any new policies and procedures.
- Annual training sessions occur to refresh training already provided and provide a forum for issues and new ideas to be raised and discussed.
- Additional training occurs as and when deemed advisable, such as when job duties change or when the employee/volunteer has exhibited behaviour of concern.



Reporting and Documenting Complaints: Potentially Unlawful Behaviour Policy

SAMPLE POLICY

At **[Insert the name of your organization here]**, all children have the right to a safe and respectful environment that is free from child sexual abuse and/or inappropriate conduct. Any abusive or unlawful act committed by an employee/volunteer will not be tolerated and will be reported to child welfare and/or law enforcement as applicable. Any employee/volunteer engaging in such acts will be subject to a range of disciplinary procedures, up to and including dismissal (see Suspension/Dismissal: Unlawful Behaviour Policy on page **[Insert the page number]**). Similarly, employees/volunteers who are aware of breaches of the Code of Conduct to Protect Children, but fail to take appropriate action, may be subject to discipline.

[Insert the name of your organization here] is committed to:

- Ensuring that prompt action is taken in regard to disclosures, allegations or suspicions of child abuse (and reporting to a child welfare and/or law enforcement agency and/or parents as required by law and as deemed necessary for the protection of children).
- Ensuring we create an environment that encourages disclosures, allegations or suspicions to be reported.
- Treating all disclosures, allegations or suspicions as confidential.

PURPOSE

Under Canadian child welfare laws, if you know or suspect child maltreatment, you have a legal obligation to report it. This is known as the “duty to report”. Every person in Canada has the duty to report known or suspected child maltreatment by law.

WHY IS THIS POLICY IMPORTANT?

Organizations must have internal reporting procedures regarding the following types of incidents:

Child Maltreatment:

- As outlined above, Canadian child welfare laws set out the duty to report and require all people to report suspicions based on reasonable grounds that a child is/or has been sexually abused; and/or disclosure of child sexual abuse.

PARAMETERS

This policy applies to all employees/volunteers of **[Insert the name of your organization here]**, including full-time, part-time, contract, temporary, or casual employees.

Employees/volunteers are required to immediately report all disclosures, allegations, suspicions, or indicators of child abuse, regardless of source or content.

Employees/volunteers are required to promptly report the following matters under this policy:

1. Reports of Unlawful Behaviour from a Child Involving an Employee/Volunteer of **[Insert the name of your organization here]** or a Third Party. All disclosures, allegations or suspicions of unlawful behaviour towards a child reported to an employee by a child regarding either:
 - a) another employee/volunteer of **[Insert the name of your organization here];** or
 - b) someone other than an employee/volunteer of **[Insert the name of your organization here]** (e.g. parent).
2. Unlawful Behaviour Witnessed by a **[Insert the name of your organization here]** Employee/Volunteer. Any incident of alleged unlawful behaviour, either:
 - a) witnessed by an employee/volunteer regarding another employee/volunteer of **[Insert the name of your organization here];** or
 - b) witnessed by an employee/volunteer regarding someone other than **[Insert the name of your organization here]** employee/volunteer (e.g. parent).
3. Reports of Unlawful Behaviour from a Third Party Involving an Employee/Volunteer of **[Insert the name of your organization here]** or a Third Party. Any alleged unlawful behaviour, either:
 - a) reported to an employee by a third party and regarding another employee/volunteer of **[Insert the name of your organization here];** or
 - b) reported to an employee by a third party regarding someone other than a **[Insert the name of your organization here]** employee/volunteer (e.g. parent).

The above reporting obligations apply whether the child involved is a participant in a program of our organization or not. ***NOTE: If you do not know the identity of the child, take steps to find out who the child is– depending on the situation, steps may need to be taken to protect that child from additional harm, the child may need to make a statement to police, etc.***

REPORTING REQUIREMENTS

An employee/volunteer has an independent legal obligation to report unlawful behaviour to child welfare and/or law enforcement.

Under this policy, an employee/volunteer is also required to report unlawful behaviour to his/her supervisor/administrator/president, who is then obligated to report it to **[Complete in accordance with the organizational chart of your organization]**.

PROCEDURE

Employees/volunteers:

1. If a child is the one conveying the information:
 - a) Treat the disclosure/allegation seriously and reassure the child.

- b) Document the disclosure/allegation on an Incident Report Form.
2. If you witness something:
- a) Do what you can to stop or interrupt the behaviour or situation causing the concern, to the extent you are able to do so without unreasonably jeopardizing your safety or the safety of the child involved. The steps you may be able to take will vary depending upon the situation and the safety concerns that may be applicable.
 - b) If you do not know the child or adult involved, take reasonable steps to identify the party you do not know and/or to note any identifiable features that may help to identify him/her.
 - c) Document what you have seen and what you may have done to intervene on the Incident Report Form, including whatever information you may have about the identity of the child or adult involved.
3. If the information is being conveyed through another source (third party, another employee, another volunteer):
- a) Treat the information received seriously.
 - b) Document the information received from the reporting person, and any other information you have received on Incident Report Form.
4. Notify your supervisor/administrator/president and report the matter to child welfare and/or law enforcement. A phone call to child welfare can be made by you on your own, or together with your supervisor/administrator/president.

Remember: the legal duty to report lies with the individual who witnessed the incident or received the disclosure, allegation or other concern. Notifying your supervisor/ administrator/president is for purposes of this policy only. It does not absolve an employee/volunteer of the legal obligation to report to CFS.

5. Documentation:
- a) Supervisor/administrator/president - document discussion with employee/volunteer on Incident Report Form.
 - b) Supervisor/administrator/president and employee/volunteer – document discussion with CFS on Incident Report Form.
6. The Supervisor/administrator/president must report the disclosure, allegation or other concern above to **[Complete in accordance with the organizational chart of your organization]**, and the individual receiving the information must report it to **[Complete in accordance with the organizational chart of your organization]**.
7. All employees/volunteers receiving the disclosure, allegation or other concern must keep the information confidential and in accordance with the confidentiality obligations set out at the end of this policy, and the obligations under the Policy on Communications with Employees About Unlawful Behaviour.

8. Leave the investigation up to the authorities mandated with this responsibility (child welfare and law enforcement). Do not investigate disclosures, allegations or other concerns, and do not discuss them with others except as required to report the information or participate in a related investigation.
9. The **[Complete in accordance with the organizational chart of your organization]** is tasked with:
 - a) Consulting with legal counsel and/or an HR professional.
 - b) Following steps in the Suspension/Dismissal: Potential Unlawful Behaviour policy.
 - c) Documenting the outcome on Incident Report Form.

OTHER MATTERS OF NOTE

Interference with the Conduct of an Investigation

A threat or promise made to discourage a disclosure, the filing of an allegation or the reporting of a concern, or any interference with the conduct of an investigation, including an attempt to have a disclosure, allegation or other concern withdrawn, is strictly prohibited and will result in disciplinary action.

Confidentiality

All disclosures, allegations and other concerns will be handled in confidence. We will not disclose the identity of any parties involved, or the circumstances of the disclosure, allegation or concern, except where necessary for the purpose of investigative or corrective action, where required by law, or for the protection of individuals. Similarly, employees/volunteers interviewed as part of an investigation or follow-up under this policy shall treat all information in a confidential manner. An employee/volunteer who breaches confidentiality may be subject to discipline.

A copy of the documented incident shall be placed in the accused employee/volunteer's human resource file. Any identifying information about the child victim or reporting person shall be removed from this copy. A generic letter shall also be placed in the file that indicates the alleged offence, how it was handled and any follow-up that was completed.

Reporting and Documenting Complaints: Inappropriate Behaviour Policy

SAMPLE POLICY

At **[Insert the name of your organization here]**, all children have the right to a safe and respectful environment that is free from inappropriate conduct. Any conduct of an employee/volunteer that violates the Code of Conduct to Protect Children will not be tolerated. Any employee/volunteer engaging in such conduct will be subject to a range of disciplinary procedures up to and including dismissal (see Discipline/Suspension/Dismissal: Inappropriate Behaviour policy). Similarly, employees/volunteers who are aware of breaches of the Code of Conduct to Protect Children, but fail to report the information and take other appropriate action as reasonable in the circumstances, may be subject to discipline.

[Insert the name of your organization here] is committed to:

- Ensuring that prompt action is taken in regard to allegations or suspicions of inappropriate behaviour.
- Ensuring we create an environment that encourages reporting.
- Treating all allegations or suspicions of inappropriate behaviour as confidential.

PURPOSE

Child-serving organizations are committed to providing safe and nurturing environments; however, because they work with children, they are vulnerable to attracting employees/volunteers who want to access and sexually abuse children or who may have inappropriate boundaries and relationships with children.

WHY IS THIS POLICY IMPORTANT?

Organizations must have internal reporting procedures regarding the following types of incidents:

Misconduct:

- An employee/volunteer's inappropriate behaviour towards a child or children.
- The action taken by the organization will depend upon the nature of the incident; however, it is important for the organization to distinguish between illegal behaviour and inappropriate behaviour and establish appropriate reporting procedures for each.

PARAMTERES

This policy applies to all employees/volunteers of **[Insert the name of your organization here]** including full-time, part-time, contract, temporary, or casual employees.

Our policies and procedures, and the Code of Conduct to Protect Children, defines inappropriate behaviour. Employees/volunteers are required to immediately report all inappropriate behaviour they witness or allegations or suspicions of inappropriate behaviour they learn about. If you are in doubt as to whether a behaviour is inappropriate, you must

report the behaviour to your Supervisor/administrator/president to enable the Supervisor/administrator/president to make an assessment.

PROCEDURE

Employees/volunteers:

1. If the child is the one conveying the information about inappropriate behaviour:
 - a) Treat the information seriously and reassure the child (if appropriate).
 - b) Report immediately to your Supervisor/administrator/president.
 - c) Document the information provided on Incident Report Form.
2. If you witness something that you believe may be inappropriate behaviour:
 - a) Do what you can to stop or interrupt the behaviour or situation causing the concern, to the extent you are able to do so without unreasonably jeopardizing your safety or the safety of the child involved. If you do not know the child or adult involved, take reasonable steps to identify the party you do not know and/or to note any identifiable features that may help to identify him/her.
 - b) Report immediately to your Supervisor/administrator/president.
 - c) Document what you have witnessed and what steps (if any) you took to stop or interrupt the behaviour on Incident Report Form.
3. If the information is being conveyed through another source (third party, another employee, another volunteer):
 - a) Treat the information seriously.
 - b) Document the information you have received on Incident Report Form.
4. Keep the information confidential.
5. **Do not attempt to determine the accuracy of the information. A process of information gathering will ensue once your Supervisor/administrator/president is made aware of the information or concern.**

Supervisor/administrator/president:

1. Consult with **[Complete in accordance with the organizational chart of your organization]**, and determine whether follow-up on the concern is warranted.
 - a) Document determination on Incident Report Form.

[Complete in accordance with the organizational chart of your organization]:

1. Meet with employee/volunteer who allegedly behaved inappropriately to discuss the information received.

- a) Tell the employee/volunteer about the information received without disclosing the source (wherever possible).
 - b) Ask the employee/volunteer to share his/her version of events.
 - c) Document the discussion on Incident Report Form.
2. Seek legal counsel and/or consult with an HR professional.
3. If applicable, follow steps from the Discipline/Suspension/Dismissal: Inappropriate Behaviour policy on page [Insert page number].
4. Document the outcome on Incident Report Form.

OTHER MATTERS OF NOTE

Interference with the Conduct of an Internal Inquiry into Inappropriate Behaviour

A threat or promise made to discourage the reporting of information about inappropriate behaviour in accordance with this policy, or any interference with the organization's follow-up discussions regarding information received about inappropriate behaviour, including an attempt to have any such information withdrawn, is strictly prohibited and will result in disciplinary action.

Confidentiality

All information related to inappropriate behaviour will be handled in confidence. We will not disclose the identity of any parties involved, or the circumstances, except where necessary for the purpose of follow-up or corrective action, where required by law, or for the protection of individuals. Similarly, employees/volunteers interviewed as part of the follow-up process shall treat all information in a confidential manner. An employee/volunteer who breaches confidentiality may be subject to discipline.

A copy of the documented incident shall be placed in the accused employee/volunteer's human resource file and parents shall be alerted where appropriate and/or necessary pursuant to existing laws and/or information shall be shared with relevant child protection authorities in your province. Any identifying information about the child victim or reporting person shall be removed from this copy. A generic letter shall also be placed in the file that indicates the alleged offence, how it was handled and any follow-up that was completed.

Confidential Information Policy

SAMPLE POLICY

Employees/volunteers of **[Insert the name of your organization here]** are regularly entrusted with confidential information regarding the community it serves. All information with respect to third parties (including information related to children and families) received by employees/volunteers in the course of their involvement with **[Insert the name of your organization here]** are regarded as confidential.

Suspensions of unlawful or inappropriate behaviour will only be shared with the employees/volunteers in the organization who need to know. **[Insert the name of your organization here]** will maintain confidentiality while keeping the interests of the child as the primary concern.

PURPOSE

This policy is intended to provide employees/volunteers with a basic understanding of their responsibilities to protect and safeguard the Confidential Information to which they have access as a result of their employment.

WHY IS THIS POLICY IMPORTANT

Maintaining confidentiality is important for building and maintaining trust, and for ensuring an open and honest communication between members, peers and employees.

PROCEDURE

Employees/volunteers:

1. All disclosures, allegations or suspicions of unlawful or inappropriate behaviour by an employee/volunteer will be directed through the formal process in a prompt manner.
2. No employee/volunteer shall attempt to address a disclosure, allegation or suspicion of unlawful or inappropriate behaviour on his/her own.
3. No employee/volunteer shall engage in, or threaten to engage in, retaliation against anyone who discloses, reports or otherwise provides information with respect to alleged unlawful or inappropriate behaviour.
4. No employee/volunteer shall disclose any confidential information to the public or to the media regarding **[Insert the name of your organization here]** policies, operations, employees, volunteers, or reports, and no employee/volunteer shall speak with the public or the media in respect of a disclosure, allegation or suspicion of unlawful or inappropriate behaviour unless, and only to the extent, authorized by the organization.
5. Upon commencement of employment, the employee/volunteer shall sign a confidentiality agreement.

Code of Conduct to Protect Children

(Courtesy of Commit2Kids)

Introduction

As a reputable child-serving organization, **[Insert the name of your organization here]** has developed the following Code of Conduct to Protect Children to guide our employees/volunteers. While every employee/volunteer is valued and unique, we come together as an organization in the best interests of children and their families. The safety, rights and well-being of children we serve are at the core of our daily operations. We nurture supportive relationships with children while balancing and encouraging appropriate boundaries.

Why a Code of Conduct to Protect Children?

At the core of our operations is a deep commitment to ensuring all children are protected and safe. A Code of Conduct to Protect Children is an important component to creating safe environments for children. As a reputable and charitable child-serving organization, the safety, rights and well-being of children served by our programs and services are paramount to the core of our daily operations and our continued public support, and it is imperative that we have transparency and accountability in all of our dealings involving children.

We believe that each employee/volunteer plays a key role in the protection of children regardless of their contact with the public. Employees/volunteers are the ambassadors of the organization, and in all dealings involving children our employees/volunteers must display, and appear to display, behaviour that is consistent with our mission.

Maintaining personal boundaries is integral to developing healthy relationships with children and families. Behaviour that presents risk often begins by breaking boundaries with children and teens. To help employees/volunteers understand what is expected, this Code includes information about the type of behaviour expected, and it provides clear direction to those who either directly observe behaviour of concern, or who learn about behaviour of concern from others.

The intent of the Code of Conduct to Protect Children is to guide our employees/volunteers in developing healthy relationships with the children involved in activities or programs delivered by our organization. By providing employees/volunteers with the guideposts against which they can measure their own behaviour and the behaviour of those around them, employees/volunteers are empowered to identify and address behaviour of concern at an early stage to help better protect children.

Treating Children with Dignity and Maintaining Boundaries

All employees/volunteers are responsible for treating all children with respect and dignity, and for maintaining appropriate boundaries. Employees/volunteers must monitor their own behaviour towards children, and be aware of the behaviour of their colleagues, to ensure that behaviour is appropriate and respectful, and will be perceived as such by others.

If at any time you are in doubt about the appropriateness of your own behaviour or the behaviour of others, you should discuss it with your supervisor/administrator/president/administrator/president. Refer to the Reporting Requirements section for further guidance.

Things to Consider:

Before engaging in any behaviour or activity with a child, and when considering how your behaviour or the activity may be perceived by the child and by others, you should consider whether:

- The activity you are engaging in with a child is known to, and approved by, your supervisor/ administrator/president/administrator/president and/or the parents of the child. All interactions with a child should be transparent.
- The activity or behaviour you are engaging in would raise concerns in the mind of a reasonable observer as to its appropriateness.
- The activity or behaviour is directly and objectively tied to your job function.
- The organization may be detrimentally affected by the activity or behaviour.
- The activity or behaviour may be reasonably regarded as posing a risk to the child.
- The activity or behaviour may contribute to a child's discomfort.
- The activity or behaviour may appear inappropriate to the organization, the child's family, or the public.

In addition, always consider the child's reaction to any activities, conversations, behaviour, or other interactions, and avoid criticizing, embarrassing, shaming, blaming, or humiliating a child. Do not place inappropriate expectations on a child. Use your instincts as a guide. Ask yourself: "Whose needs are being met by the activity or behaviour?" The purpose of an activity or behaviour should always be to meet the child's needs, not the adult's needs.

Tip: If the child seems uncomfortable with the activity or behaviour, that is a good indication that the activity and/or behaviour is unwelcome and should stop. You need to reassess the activity or behaviour and consult with your supervisor/administrator/president/administrator/president before continuing.

General Rules of Behaviour

- Employees/volunteers of our organization must:
- Treat all children with respect and dignity.
- Establish, respect and maintain appropriate boundaries with all children involved in activities or programs delivered by the organization.
- Always adhere to the organization's policies and procedures in dealing with children.
- Treat all disclosures, allegations or suspicions of sexual or other unlawful or inappropriate behaviour involving a child seriously – an employee/volunteer must report all disclosures, allegations or suspicions of inappropriate or unlawful behaviour as set forth in this Code of Conduct to Protect Children.

Employees/volunteers of the organization must not:

- Engage in any sort of physical contact with a child that may make the child or a reasonable observer feel uncomfortable, or that may be seen by a reasonable observer to be violating

reasonable boundaries.

- Engage in any communication with a child within or outside of work that may make the child uncomfortable or that may be seen by a reasonable observer to be violating reasonable boundaries.
- Engage in any behaviour that goes against (or appears to go against) the organization's mandate, policies or Code of Conduct to Protect Children, regardless of whether they are serving the organization at that moment
- Conduct their own investigation into allegations or suspicions of inappropriate behaviour – it is an employee/volunteer's duty to report the matter to his/her supervisor/administrator/president/administrator/president or child welfare, not to investigate.

Ranges of Inappropriate Behaviour

It is important for all employees/volunteers to understand that behaviours, as they relate to the safety and protection of children, fall into a continuum.

On one end of the continuum are those behaviours that are unlawful. Unlawful behaviours are those that are criminal or that breach child welfare or related legislation, and include such things as child abuse, sexual assault, sexual interference, invitation to sexual touching, sexual exploitation, procurement, luring, child pornography offences, corrupting morals, indecent acts, voyeurism, etc.

Unlawful behaviours need to be reported to the child welfare agency and/or law enforcement for investigation. This Code provides you with information about how to submit such a report.

At the other end of the continuum are those behaviours that are *inappropriate* but are of such a nature that it is believed they can be addressed and corrected through additional training, supervision and monitoring. Inappropriate behaviour could range from one-time behaviours to multiple instances, and could include behaviour that is repeated even after it has been brought to the attention of the employee. It includes such things as telling inappropriate jokes to or in earshot of a child, confiding in a child with personal stories and having unauthorized contact with a child outside of work duties.

Inappropriate behaviour needs to be brought to the attention of management so it can be followed up formally and internally. The organization will determine if the behaviour is inappropriate and how it will be addressed.

In the middle of the continuum are those behaviours that may either be unlawful or inappropriate, depending on the overall circumstances. Or, it may be behaviour that is initially seen as behaviour that could be corrected through additional training, supervision and monitoring, but upon following up and learning more information, it is determined the behaviour is more serious and warrants a formal investigation.

For example, one instance of grooming behaviour may initially be seen as inappropriate, but of such a nature that it can be dealt with internally. However, upon following up on the behaviour and learning more about the overall circumstances and any prior inappropriate behaviour, the behaviour may be elevated to something that warrants a report to the child welfare agency. Consider the following example:

A report is submitted internally about an employee/volunteer exchanging unauthorized emails with a child outside of his/her work duties. The initial information indicates that the emails are of a general nature. After the organization follows up, it learns that some of the emails were sexual in nature, and it learns that the employee/volunteer has exhibited other inappropriate behaviour that had not been reported previously. Each instance of inappropriate behaviour, if considered separately and without context of the other behaviours, might be characterized as something in the nature of “poor judgment” that is capable of correction. However, once all behaviours are considered in context with each other, it may be sufficient to warrant a report being made to the child welfare agency, law enforcement or the licensing body for the individual.

For the protection of children in our care, all instances of inappropriate behaviour will be followed up on. Behaviours of concern will be reported to the child welfare agency, law enforcement or the licensing body for the individual for further investigation whenever we deem such action to be warranted.

What Constitutes Inappropriate Behaviour

Inappropriate behaviour will not be tolerated, especially as it relates to the well-being of the children involved in activities or programs delivered by the organization.

Inappropriate behaviour falls on a continuum, as noted in the section above headed “Ranges of Behaviour.”

Behaviour considered inappropriate is that which may be seen by a reasonable observer to be violating reasonable boundaries, and includes, but is not limited to, the following:

1. Communication that goes beyond the employee/volunteer’s responsibilities with the child and/or does not occur within the context of their duties and responsibilities. For example:
 - Making personal phone calls to a child and/or one or more members of the child’s family
 - Having personal electronic or cell phone exchanges with a child and/or one or more members of the child’s family (email, text message, instant message, online chats, social networking (including “friending”), etc.), regardless of who initiated the exchange
 - Writing personal letters to a child or one or more members of the child’s family
 - Excessive communication (online or offline) with a child or the child’s family

You must report all communication with a child or his/her family that occurs outside the workplace. This enables the organization to ensure any such communication is appropriate and within reasonable boundaries, and will help to identify any problematic situations.

2. Spending time with a child or the child’s family outside of designated work times and activities, especially if this is not known to your supervisor/administrator/president/administrator/president and the child’s parents. You must report to your supervisor/administrator/president/administrator/president all contact with a child or the child’s family outside of designated work times and activities BEFORE the contact occurs.
3. Favouring one or more children to the exclusion of others (for example, paying a lot of attention to, giving or sending personalized gifts*, or allowing privileges that are excessive,

unwarranted or inappropriate).

*Note: It is not inappropriate behaviour to give a contextually appropriate thank-you card, birthday card, seasonal card, or other nominal gift to the child, where such a gesture would be considered reasonable under the circumstances, provided that all gestures taken together are not excessive in number and that such exchanges are carried out within a work context, in the presence of other adults and with the full knowledge and consent of the organization.

4. Using a personal cell phone, camera or video to take pictures of a child, or allowing any other person to do so, as well as uploading or copying any pictures you may have taken of a child to the Internet or any personal storage device. Pictures taken in a work related setting, with prior written consent from the parent/guardian, and in circumstances in which the parent/ guardian and your supervisor/administrator/president/administrator/president is aware that pictures are being taken may be permissible provided the organization has approved the activity in advance and has put procedures in place to ensure the pictures will be stored in a location only accessible to those with a need to access and removed when no longer required for the purpose for which they were taken.
5. Offering or providing rides to a child in your personal vehicle, or in the organization's vehicle, except when your supervisor/administrator/president/administrator/president/ administrator/president is aware of and has approved it and express parental consent has been granted, or in emergency situations. You must report all rides you give to a child, whether in your own vehicle or in the company vehicle, to your supervisor/administrator/ president/administrator/president/administrator/president.

In addition to the foregoing, the following behaviour is considered serious and may trigger a report to child welfare in addition to any other internal disciplinary procedures:

6. Telling sexual jokes to a child or making comments to a child that are in any way suggestive, explicit or personal.
7. Showing a child material that is sexual in nature, including signs, cartoons, graphic novels, calendars, literature, photographs, and screen savers, displaying or keeping such material in a location where it is reasonably possible that a child may see it, or making such material available to a child
8. Physically or emotionally harming a child
9. Intimidating or threatening a child
10. Making fun of a child

Whether or not a particular behavior or action constitutes inappropriate behaviour will be a matter determined by the organization having regard to all of the circumstances, including past behaviour, and allegations or suspicions related to such behaviour.

Reporting Requirements

All employees and volunteers are required to report unlawful behaviour to police/child welfare and inappropriate behaviour or incidents to their supervisor/administrator/president/ administrator/president/administrator/president. This requirement applies not only to behaviour or incidents that you personally witness, but also to those that you hear about.

Adults often worry that they may be overreacting and misreading a situation, and this may cause them to minimize concerning behaviour they witness or hear about. There is also a fear of damaging a working relationship by raising a concern about a work colleague. It can be hard to believe that someone you work with or someone you met through your work duties could harm a child, and it can be tempting to downplay a transgression in the hopes it will not be repeated.

Keep in mind that the focus always has to be on the behaviour, not the person.

A person's character or their position in the organization has nothing to do with whether that person's behaviour is appropriate or inappropriate in a given situation. It cannot be about whether you are "right" or "wrong," it must be about doing the best you can to identify behaviour of concern so it can be dealt with appropriately.

Categories of incidents that need to be addressed by staff/volunteer under this Code of Conduct to Protect Children include the following:

1. Reports of Unlawful Behaviour from a Child Involving an Employee/Volunteer of the organization or a Third Party. Disclosures or allegations of unlawful behaviour reported to an employee by a child regarding either:
 - a) another employee /volunteer of the organization; or
 - b) someone other than an employee/volunteer of the organization (e.g. parent, teacher, babysitter, coach);

must be reported to child welfare and/or police in accordance with the Reporting and Documenting Complaints Policy re: Potentially Unlawful Behaviour.

2. Unlawful Behaviour Witnessed by an Employee/Volunteer of the Organization. Any incident of alleged unlawful behaviour either:
 - a) witnessed by an employee/volunteer regarding another employee/volunteer of the organization; or
 - b) witnessed by an employee/volunteer regarding someone other than an employee/volunteer of the organization (e.g. parent);

must be reported to child welfare and/or police in accordance with the Reporting and Documenting Complaints Policy re: Unlawful Behaviour. If you do not know the identity of the child, take steps to find out who the child is– depending on the situation, steps may need to be taken to protect that child from additional harm, the child may need to make a statement to police, etc.

Note: If you are a witness to abuse in progress, it is expected that in addition to reporting what you see, you will also do what you reasonably can to stop or disrupt the interaction. The steps may vary according to what you are witnessing and what personal safety considerations may exist for you and/or the child being abused. If you do not feel you can intervene safely, you should immediately get additional help, whether by calling the police, involving other employees, etc.

3. Inappropriate Behaviour Involving a Centre Employee/Volunteer. Inappropriate behaviour that is either:

- a) reported to the employee/volunteer by a child or third party regarding another employee/volunteer of the organization; or
- b) witnessed by the employee/volunteer and involving another employee/volunteer;

must be reported to the organization in accordance with the Reporting and Documenting Complaints Policy re: Inappropriate Behaviour. In addition to reporting, if you witness the inappropriate behaviour you should take steps that can safely be taken to stop or disrupt the interaction, as outlined in #2 above.

4. Inappropriate Behaviour Involving Third Parties. Inappropriate behaviour that is either:

- a) reported to the employee/volunteer by a child or third party regarding a third party; or
- b) witnessed by the employee/volunteer and involving a third party;

must be reported to the organization in accordance with the Reporting and Documenting Complaints Policy re: Inappropriate Behaviour. In addition to reporting, if you witness the inappropriate behaviour you should take steps that can safely be taken to stop or disrupt the interaction, as outlined in #2 above.

IMPORTANT NOTE: If you are not sure whether the issue you have witnessed or heard about involves unlawful behaviour, or inappropriate behaviour, discuss the issue with your supervisor/administrator/president/administrator/president/administrator/president who will guide you through the process. Remember: You have an independent duty to report all unlawful behaviour directly to child welfare.

Consequences of Failing to Adhere to this Code of Conduct to Protect Children

Depending on the circumstances, failure to adhere to the Code of Conduct to Protect Children by an employee/volunteer may result in:

- follow-up by the organization to (1) gather information about what happened and (2) determine what, if any, disciplinary action is required; and/or
- a report to child welfare or law enforcement (or both).

Consequences, disciplinary or corrective actions will be as determined by the **[Insert head of organization]**, and will be based on the nature and severity of the incident, as well as information learned during follow-up, and any past behaviour of concern.

If, in following up on a concern, we believe the behaviour exhibited by an employee, volunteer or a third party may constitute unlawful behavior we will report the behaviour to child welfare and possibly law enforcement.

In addition, in circumstances where multiple behaviours are reported, where inappropriate behaviour is recurring, or where one instance of inappropriate behaviour is of serious concern, the organization may refer the matter to child welfare, law enforcement or the employee's licensing body for investigation. Failure to adhere to the Code of Conduct to Protect Children by any employee/volunteer will result in follow-up to look into the situation and disciplinary

action if necessary. Appropriate consequences/disciplinary actions are to be determined by management, and will be based on the nature and severity of the incident.

I agree to comply with the Code of Conduct to Protect Children for **[Insert the name of your organization here]**.

Employee/volunteer's signature

Date

If You Have Questions

While working for the organization you are bound to be presented with issues and scenarios that have not been addressed specifically in this Code of Conduct to Protect Children, or that you need further guidance on. Should that occur, you are encouraged to approach your supervisor/administrator/president/administrator/president for guidance and direction on next steps. If your concern involves your supervisor/administrator/president/administrator/president, or you have raised the issue with your supervisor/administrator/president/administrator/president and are not satisfied with the response, you should approach **[document according to the organization's chain of authority]** for guidance.