

RCA SAFE SPORT PROPOSED REVISIONS 2024-2025

Policy Version: Member Organization Level

Note – Reference numbers relate to numbers on proposed document

SECTION: CHANGES TO ENTIRE PACKAGE

Reference Number	Previous Content	Proposed Content	Rationale
	Sport Dispute Resolution Centre of Canada (SDRCC)	Abuse-Free Canada	The name of the organization has been changed and restructured. <i>(Note this is set to change again before final version).</i>
	Definitions only	Added an Appendix with Acronyms	Help guide readers, separate from definitions
		Reordered policies within package, added page numbers, removed extra pages	Flow better electronically and in general

SECTION: INTRODUCTION

Reference Number	Previous Content	Proposed Content	Rationale
		Rewrote Introduction to provide more of an overview and background	More welcoming and appropriate to goals

SECTION: DEFINITIONS

Reference Number	Previous Content	Proposed Content	Rationale
1-3	New Additions and deleted UCCMS Participant	Added definitions related to Abuse-Free Sport, Abuse-Free Sport Participant and Abuse-Free Sport Participant Consent Form	Recognizing new name for program for national independent safe sport mechanism

15 20 25 26 30 32 33 36 37	Discrimination Maltreatment Power Imbalance Prohibited Behaviour Reporting (or Report) Sexual Maltreatment Signatory UCCMS Vulnerable Participant	Updated Terminology	To reflect changes with national independent safe sport mechanism. To incorporate the new definitions provided in UCCMS and ensure our document stays current with national documents.
8	Additional term	Athlete Support Personnel	Added broader term to encompass coaches, medical staff, managers etc.
29	Additional term	Provisional Suspension	To recognize use of term in Discipline & Complaints Policy
27 28 35	Additional terms	Prohibited Method Prohibited Substance Tampering	Terms defined in Canadian Anti-Doping Program
34	Social Media	Social Medium (Social Media)	Definition altered for clarity
Below	Addition	Add link to UCCMS	For ease of cross referencing source documents, aware of possible changes to UCCMS outside of our control.

SECTION: CODE OF CONDUCT & ETHICS

Reference Number	Previous Content	Proposed Content	Rationale
8 e/f)	Language regarding use of alcohol & cannabis	As permitted by provincial and other relevant laws, in the context of a social Event, responsible consumption of alcohol is permitted in an adult-oriented social situation, but reasonable steps must be taken to manage responsible consumption and there will be zero tolerance for drinking in excess, showing drunken	Language adjusted to reflect legal age requirements not simply minors and better reflect the intent for reasonable consumption as permitted.

		behaviour, or exhibiting inappropriate behaviour due to the consumption of alcohol	
Previous in 8	Report any ongoing criminal or anti-doping investigation, conviction, or existing bail conditions involving an Individual to RCA or to a Member, including, but not limited to, those for violence, child pornography, or possession, use, or sale of any illegal or Prohibited Substance or Method	Removed	It wasn't clear and is covered under Screening policy and other aspects of Code of Conduct.
9 a)	Regarding duty of loyalty for directors	Added additional language about disclosing conflict of interest	Part of legal requirements for directors
9 /10 /12	Comply with screening policy	Removed	Covered in 8l) to comply with all policies.
10 i)	Not included previously	Comply with all established responsibilities and obligations as set out by the professional's governing body, if any.	Added statement to ensure clarity on alignment with professional bodies.
12 p)	Not included previously	Where applicable, adhere at all times to the rules of World Rowing, as well as the rules of any other sport organization that has relevant and applicable authority over the umpire.	Added statement to ensure clarity on alignment with World Rowing and other agencies.
13 h)	Not included previously	Never encourage, aid, cover up, or assist an Athlete in cheating through doping, competition manipulation, or other behaviours which may be considered cheating.	Clarification on expectations for parents/guardians/spectators to not be involved with any unethical activity such as cheating.
	Section on Member Organizations	Removed	Requirement to be a member in good standing with RCA determined to more appropriately belong in separate document.
14-17	Anti-Doping Section	Wording updated to reflect requirements of Canadian Anti-doping Program	

SECTION: PROTECTION POLICY/ ATHLETE PROTECTION POLICY

Reference Number	Previous Content	Proposed Content	Rationale
Name	Athlete Protection Policy	Protection Policy	Better reflect the intent of policy. In protection of everyone involved in rowing.
2	Included introduction with definition of Rule of Two from Coaches Association	Trimmed introduction and removed definition	Clarity and better emphasize the requirements in each type of situation and the requirements in the policy.
3	Included reference to Rule of Two definition	Included “at the gold standard of two screened and trained Athlete Support Personnel”	Reflect removal of definition, highlighted ideal goal.
4 d)	...within earshot and eyesight of another Person in Authority	...in an open and observable environment.	Consistency in language and recognizing it may be open to public not another Person in Authority
5 b)	Allowed personal texts/direct messages to individual Athletes when circumstances required	Highlighted that personal texts may not be sent except in special circumstances.	Reworded for clarity
5 g)	Not permitted to keep a secret for others	Added phrase “...for any unethical, inappropriate, prohibited or improper purpose.”	To recognize range of situations where information may be held in secret, from birthday surprises to overall confidentiality.
6 g)	Virtual Sessions should be recorded	Unless otherwise prohibited by professional regulations or where an Athlete and/or Vulnerable Participant does not provide consent, virtual sessions between Persons in Authority and Athletes and/or Vulnerable Participants must be recorded	Strengthen language to must be recorded while still recognizing occasions when it will not happen.

7 a) 7 d)	Travel restrictions on Athletes	Changed to Vulnerable Participants	To reflect that adults, recreational and Masters, have more flexibility than groups with Vulnerable Participants
8 a)	Reference to - Regatta weigh-in areas	Reference has been removed from section	Regatta weigh in areas should be treated differently from change rooms as there is no expectation of privacy at weigh-in
8 a) 8 b)	Suggested team communication was a reason to enter locker area	Added language to reflect emergencies acceptable to enter locker/change area	To better reflect intention and reality of activity around changing areas.
9 d) 9 e)		Added additional language to reflect image consents.	Image consents should be signed, no images posted without consent. Recognize individual have option to not provide consent.
10 a)	Regarding communication about physical contact	Added language to clarify communication is to happen "...prior to the contact occurring"	Important clarification of timing and process.
10 c)	Regarding physical contact	Added language clarifying that physical contact in section is contact "unrelated to teaching a skill or tending to an injury" and contact that is permitted "should be limited in duration"	Important clarification of parameters related to physical contact.

SECTION: SCREENING POLICY

Reference Number	Current content	Proposed change	Rationale
3	For more information on how to obtain an E-PIC or a VSC, please consult the RCA Safe Sport webpage	Removed	Not appropriate for policy, update information, geographically specific available in other locations.
4	Screening Committee (name and description)	Screening Delegate Impartial, designated screener	Clarify that an individual usually fills role, while could still be a group. More accurately describe role and actions.

7	When first engaged...	Added additional language “...and/or at any time a change in position results in a change in level with the matrix. “	To clarify that if someone wishes to take on new role their screening level may change and may need to submit additional screening.
10	Additional language	Current versions of screening documents. Current defined within six months of submission.	Clarify that timeline that documents are considered acceptable.
10	If an individual is uncertain of which category they fall into, they may contact RCA or the Member for assistance	Removed	It is responsibility of organization leadership to determine level. The individual should seek clarity from person completing the screening.
11	Additional language	All positions are conditional on both the completion of the indicated screening activities in the matrix as well as an acceptance of the results of those activities	Clarify process regarding screening documents as a condition for any position.
12	EPIC or VSC Demonstrates	Criminal Record Check Submits proof	Broader language more inclusive of differences in names of record checks. Clarity of requirement regarding initiating process.
17	Screening Documentation – Criminal Record Check results	Revised breakdown of offences that could be on result of a criminal record check and how that would impact. Change in how driving offences are addressed. Opportunity to put conditions based on results.	Clarity on language to assist screening process. Recognition of driving offences separate from other offences.
21	An E-PIC every three years A Screening Disclosure Form every three years A Screening Renewal Form every year A Vulnerable Sector Check once	...required to renew their screening by submitting the following documents: Every Third Year – A Screening Disclosure Form and a current	Clarification on the cycle of renewal documents required and when.

		Criminal Record Check Annually, in any year when the above is not completed – Screening Renewal Form	
WAS 23-27	<p>Orientation, Training, and Monitoring</p> <ol style="list-style-type: none"> 1. The type and amount of orientation, training, and monitoring will be based on the individual’s level of risk, at the discretion of RCA or the Member, as applicable. 2. Orientation may include, but is not limited to: introductory presentations, facility tours, safe sport policy training, equipment demonstrations, parent/Athlete meetings, meetings with colleagues and supervisors, orientation manuals, orientation sessions, and increased supervision during initial tasks or initial period of engagement. 3. Training may include, but is not limited to: certification courses, online learning, mentoring, workshop sessions, webinars, on-site demonstrations, and peer feedback. 4. At the conclusion of orientation and training, the individual will be required to acknowledge, in written form, that they have received and completed the orientation and training. 5. Monitoring may include but is not 	Removed from policy	<p>Not appropriate as part of screening policy. Recognition that orientation and training not limited to the relation to the screening policy, could be misleading.</p> <p>Examples added to Matrix and Code of Conduct to reflect need for training etc.</p>

	limited to: written or oral reports, observations, evaluations, tracking, electronic surveillance, and site visits.		
Appendix A	Additional language as introduction	Organizations should assess the level of risk of every role based on the position of authority that the role puts a person in, the participants over whom they will have authority, and the behaviours expected in the role they will be put in to determine where each position in the organizations falls within the matrix.	Clarify in matrix document regarding determination on level. Supporting matrix as a stand-alone resource.
Appendix A	Descriptions and Examples	Adjusted wording	To improve clarity in guiding organization leadership in determining positions.
Appendix A	Requirements – listed specific VSC or EPIC	Used CRC where required with note below on acceptable CRC that meets requirements	Modifications made based on need to obtain VSC based on changes to Police Record legislation.
Appendix A	Requirements - Participate in training, orientation, and monitoring as determined by the organization	Demonstrate safe sport understanding Be informed any relevant requirements of Protection Policy	Language more specific to role and screening to help support organization leaders.
Appendix A	Requirements - Provide one reference related to the position	Provide two references related to the position	Considered standard to have two references when taking on new positions.
Appendix A	Additional level added	Level 4 - Individuals who support activities on a one time, or irregular basis. They play an important but supportive role. Removed from interactions with athletes.	Additional level added to provide clarity and guidance on screening for volunteers who play a short role in events.
Appendix A	Additional explanation added	Acceptable Criminal Record Checks: Description of the various CRC	Added clarifying language to reflect differences in the types of criminal record

			checks. (PRAs to alter if any provincial differences).
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SECTION: SOCIAL MEDIA POLICY

Reference Number	Current content	Proposed change	Rationale
3 d	Coaches & Staff	Athlete Support Personnel Employees/volunteers	Updated terminology to be more inclusive
3 f	Additional conduct example added	Any instance in which a Social Medium has been a vehicle in violating confidentiality obligations related to any complaints and/or investigations.	Ensure clarity regarding not using social mediums to break confidentiality.

SECTION: APPEAL POLICY

Reference Number	Current content	Proposed change	Rationale
2	Additional language added	However, it does not apply to appeals of any decision related to the application of the UCCMS made within the Abuse-Free Sport Program.	Recognition of the requirements of OSIC, this policy not applicable.
5	B) Matters of general application such as amendments to [CLUB NAME]'s By Laws; c) [CLUB NAME]'s operational structure and committee appointments; d) Issues of budgets and budget implementation; e) Employment matters or matters of operational structure or staffing or volunteer leadership opportunities;	B) Governance and operational matters including, but not limited to, budget, leadership opportunities, by-laws, and staffing	Grouped together similar items for brevity

6	Additional language added	Notwithstanding the above, appeals in relation to disciplinary decisions made pursuant to the Discipline and Complaints Policy must be filed with the Independent Third Party, which must otherwise comply with the requirements of this Section 6.	Clarifying that appeals related to discipline are to utilize ITP.
10- 15	Submitting an Appeal – CRO Decisions	Remove Reference to Request for Reconsideration Simplified appeal process for CRO decisions – removed need for appeal manager and limiting appeal to decisions regarding sanctions.	Simplify process while retaining the abilities of parties to appeal.
21	“For appeals filed pursuant to ... the parties may first attempt...”	Remove dispute resolution option for appeals to CRO decisions. “Except for appeals against Complaint Resolution Officer decisions, the Parties may first attempt to resolve the appeal through the <i>Dispute Resolution Policy</i> ...”	Remove dispute resolution options to simplify process given nature of situations with CRO decisions.
28	Additional language added	If a decision in the Appeal may affect another party to the extent that the other party would have recourse to an Appeal in their own right under this Policy, that party will become a party to the Appeal in question and will be bound by its outcome.	Clarifying that all impacted parties would be affected by appeal.
31	f) The appeal panel may allow as evidence at the hearing any oral evidence and document or thing relevant to the subject matter of the appeal, but may exclude such evidence that is unduly repetitious and shall place such weight on the evidence as it deems appropriate	F) The appeal panel may exclude any evidence filed by the Parties that is unduly repetitious or otherwise an abuse of process. The appeal panel shall otherwise apply relevant and applicable evidentiary rules in relation to the admissibility and weight given to any evidence filed by the Parties G) Nothing is admissible in evidence at a hearing that: i) would be inadmissible in a court by reason of any privilege under the law of evidence; or ii) is inadmissible by any statute or common law.	Clarification around rules of evidence.
35-40	Added sections	<u>37) Subject to Section 36 below, unless the matter involves a Vulnerable Participant, [PRA] shall publish the outcome of the appeal on their...</u>	Additional information about reporting the results of an appeal. Also, administrative

		<p>38) If the appeal panel dismisses the appeal, the decision may only be published, as provided for above with the Respondent's consent. ...</p> <p>39) Other Individuals or organizations, including but not limited to, Members, shall be advised of the outcome of any decisions ...</p> <p>40) Any decision rendered pursuant to this Policy ...</p> <p>41) Records of all decisions will be maintained by RCA, [PRA] and its ...</p> <p>42) The appeal panel's decision is final and binding on the Parties. ...</p>	clarification about records and notifications.
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SECTION: DISCIPLINE & COMPLAINTS POLICY

Reference Number	Previous Content	Proposed Content	Rationale
1	Additional language	Added phrases: “...as amended from time to time” & “Non-compliance with any of RCA’s policies, by-laws, rules or those of its Members, as applicable...”	Add clarification on the breadth of the policy.
2		This Policy applies to all Individuals and to any alleged breaches of RCA’s policies, by-laws, rules or regulations, or any of those of its Members that designate this Policy as applicable to address such alleged breaches.	Add clarification on the breadth of the policy.
8-11	Section on Minors	Items reordered	To increase clarity on process
12-14	Not previously included	Incidents falling under maltreatment must be reported to OSIC.	Modification made to reflect new approach in Abuse-Free Sport Consent Form regarding historical complaints (i.e., those received prior to RCA’s

			December 13, 2022, effective date with the OSIC).
13	Not previously included	Acknowledgement that OSIC will determine eligibility of historical complaints.	Modification as above regarding historical complaints. Historical complaints are now expressly allowed under the terms of the updated Abuse-Free Sport Participant Consent Form; however, they are subject to strict admissibility criteria, notably whether the individual in question is a current risk to participants.
15	"All complaints..."	All complaints that are not addressed in section 12/13	To address complaints that go to OSIC and the different requirements for OSIC.
18	Additional language	Regarding organization acting as a Complaint	Providing options in this type of situation
25-26	Addressing situations when a conflict or resource limitations result in RCA/PRA taking over complaint	Additional language if complaint is not dealt with in timely manner. Language addressing costs	Additional clarification regarding situations where RCA/PRA takes carriage of complaint.
28-32	Section 58 – Suspension Pending a Hearing	Provisional suspensions sections added	Clarification that RCA or PRA may impose a provisional suspension while investigations is ongoing. Also, in addition to any measures imposed by the OSIC DSO, additional interim measures may be imposed.
34	Section regarding CRO asking for submissions	Additional language specifying that process will continue unless complaint is withdrawn by complainant(s).	To ensure that regardless of participation a complaint will move forward.
35	Not previously included	Added: "If the matter before the Complaint Resolution Officer involves a Complainant who wishes to keep their identity confidential, the Complaint Resolution Officer may redact documents as they	To provide options to protect confidentiality if needed.

		consider reasonably necessary to protect the confidentiality of the Individual, but only to the extent that any redactions do not compromise the Respondent’s procedural fairness rights. “	
36	Inserted new phrase	Added “or, if permitted by the Complaint Resolution Officer,” ... ask questions	Clarifies that if the parties meet the CRO determines if they can ask each other questions, it may not be permitted.
42	Request for Reconsideration/Appeal Request for Reconsideration by CRO as first step before appeal.	Removed Request for Reconsideration Appeal wording now – Decisions made by the Complaint Resolution Officer may be appealed by the Complainant(s) or Respondent(s) in accordance with the relevant and applicable process described in the <i>Appeal Policy</i>	Simplify process. Determined Request for Reconsideration not commonly used and not effective for CRO to reconsider.
48 g)	Previous g) content combined in f); new content added	g) Nothing is admissible in evidence at a hearing that would be inadmissible in a court by reason of any privilege under the law of evidence; or is inadmissible by any statute or common law. :	Clarification around rules related to what evidence is acceptable.
54	Discipline Panel with Case Manager procedures	Additional language specifying that process will continue unless complaint is withdrawn by complainant(s).	To ensure that regardless of participation a complaint will move forward unless complaint withdraws.
53	Additional section added	Facts established by a criminal court, by a civil court or by a professional disciplinary tribunal of competent jurisdiction shall be admissible as evidence within the disciplinary process, as allowable by applicable law.	Clarification of evidence rules and impact of legal cases or similar outside findings.

56	Subject to Section 50 below, the discipline panel's decision will be considered a matter of public record unless decided otherwise by the discipline panel. However, the Parties may request that the discipline panel redact all or part of the decision. This decision shall be at the discipline panel's sole discretion and may not be appealed.	Subject to Section 61 below, unless the matter involves a Vulnerable Participant, once the appeal deadline in the <i>Appeal Policy</i> has expired, RCA or the Member (as applicable) shall publish the outcome of the case on their website. Publication shall be limited to the provision(s) of the relevant policies that have been violated, the name(s) of the Individual(s) involved, and the sanction(s) imposed, if any. Additionally, where RCA acts as the Complainant under Section 16 above, only RCA, and not the original Complainant, shall be identified as an involved Individual. If the matter is appealed, the publication provisions in the <i>Appeal Policy</i> shall apply. Identifying information regarding Minors or Vulnerable Participants will never be published by RCA or one of its Members.	Regarding publishing sanctions changed language and added clarification regarding Vulnerable Participants and what is included in what is published.
57	New language added	Failure to respect this provision may result in disciplinary action being taken pursuant to this <i>Discipline and Complaints Policy</i> .	Clarification that publishing information could result in discipline.
58	New sections added	The discipline panel's decision will come into effect as of the date that it is rendered, unless decided otherwise by the discipline panel. The discipline panel's decision will apply automatically to and must be respected by RCA, all of its Members and any Individuals involved	Added clarification
59	New section added	The Case Manager shall communicate decisions rendered pursuant to this Policy to RCA, the Parties, the relevant Member(s) and to the Independent Third Party. Decisions shall be considered confidential,	Added clarification

		unless the discipline panel orders otherwise. Records of all decisions will be maintained by RCA and its Members in accordance with their respective privacy policies.	
60	Information on the panel's report moved from the sanctions section to be with report information. Added additional requirements	When the discipline panel imposes a sanction, the decision shall include, at a minimum, the following details: <i>a. Jurisdiction;</i> <i>b. Summary of the facts and relevant evidence;</i> <i>c. Where applicable, the specific provision(s) of RCA (or a Member)'s policies, bylaws, rules or regulations that have been breached;</i> d. Which Party or organization is responsible for the costs of implementing any sanction; e. Which organization is responsible for monitoring that the sanctioned individual respects the terms of the sanction; f. Any reinstatement conditions that the Respondent must satisfy (if any); g. Which organization is responsible for ensuring that the conditions have been satisfied; and, h. Any other guidance that will assist the Parties to implement the discipline panel's decision.	Moved to be with other report pieces for clarity. Added pieces (in italics) for thoroughness and clarity.
61	Sanctions Section	Sections have changed order	To reflect the order in which things must be considered to ensure a step is not missed.
62	New section added	Any sanction imposed must be proportionate and reasonable. However,	Instructions for discipline panel

		progressive discipline is not required, and a single incident of Prohibited Behaviour, Maltreatment or other misconduct may justify elevated or combined sanctions.	
63/64	Expansion of previous section (51)	Each type or category of sanction has been defined and more fully explained	To provide clarification and guidelines.
65	Replaces section - Criminal Convictions (59) and adds language	An Individual's conviction for certain <i>Criminal Code</i> offences involving harmful conduct shall carry a presumptive sanction of permanent ineligibility from participating in the activities of RCA and its Members. Such <i>Criminal Code</i> offences may include, but are not limited to: a) Any child pornography offences b) Any sexual offences c) Any offence of physical violence	Provide specific guidelines to impact of specific criminal convictions.
72	Enhanced & additional language	None of the Parties (or their representatives or witnesses) or organizations referred to above will disclose confidential information relating to the discipline or complaint, including information obtained as a result of any step in the discipline and complaints process, to any person not involved in the proceedings, unless RCA or a Member is required to notify an organization such as an international federation, Sport Canada or other sport organization (i.e., where a Provisional Suspension or interim measures have been imposed and communication is required to ensure that they may be enforced), or notification is otherwise required by law.	Adds recognition that there is a requirement to notify Sport Canada and/or other organizations in certain situations.