

Tier 3 - Interactions Policy

Note that all capitalized terms in this document refer to defined terms in the Implementation Guide.

1. Approval Date

This policy was approved by [INSERT NAME OF APPROVING PERSON/BODY] on [INSERT DATE]. To ensure currency, relevancy, and accountability, this policy shall be reviewed [annually or once every two years].

2. Purpose

This policy ensures that all *Participants* create and uphold a safe sporting environment free from abuse and *Maltreatment* by emphasizing healthy relationships. Interactions between *Participants* may take place in a number of different settings and contexts. The goal of this policy is to ensure [INSERT NAME OF SPORT ORGANIZATION] is taking the appropriate steps to prioritize the safety of *Participants* while they interact with one another. It is designed with *Minors* at the center, though it applies to all *Participants*.

[INSERT NAME OF SPORT ORGANIZATION] recognizes that instances of *Maltreatment*, including sexual violence, could occur in isolated, one-on-one situations. Thus, it is imperative to curtail such interactions to mitigate risk. This policy also acknowledges that healthy child-adult relationships can be conducive to development. Policies addressing interactions preserve the well-being of *Minors* while also welcoming constructive, safe, trusted, and caring relationships. This policy includes five sections related to safeguarding interactions, namely:

- Open and Observable Environments;
- Out of Program Contact;
- Social Media, Electronic Communications, Photography and Video;
- Gifting; and
- Travelling.

3. Authority and Scope

3.1 This policy applies to all persons who are involved in the activities of [INSERT NAME OF SPORT ORGANIZATION], particularly all *Participants* who hold a position of trust or authority. This may include, but is not limited to:

- 3.1.1 Anyone who signed the *Universal Code of Conduct to Prevent and Address Maltreatment in Sport (UCCMS)* Pledge;
- 3.1.2 Anyone in a position of employment, volunteering, or serves on the Board, with [INSERT NAME OF SPORT ORGANIZATION];
- 3.1.3 Anyone aged 19 or older in a working relationship with [INSERT NAME OF SPORT ORGANIZATION];
- 3.1.4 Parents, legal guardians, and caregivers of *Minor* athletes or *Vulnerable Participants* who participate in sport with [INSERT NAME OF SPORT ORGANIZATION];

- 3.1.5** Any person contracted, subcontracted, or are third-party providers by [INSERT NAME OF SPORT ORGANIZATION] or teams of [INSERT NAME OF SPORT ORGANIZATION] including, but not limited to, athletic trainers, dieticians, counselors, etc.; and
- 3.1.6** Anyone participating in other capacities such as, but not limited to, an athlete, a coach or an official, with [INSERT NAME OF SPORT ORGANIZATION].
- 3.2** This policy is applicable within [INSERT NAME OF SPORT ORGANIZATION]'s environment, including all activities and events, in in-person and virtual settings whereby [INSERT NAME OF SPORT ORGANIZATION] is involved. This may include, but is not limited to: tryouts, camps, Board meetings, practices, events, tournaments, hotel rooms/lodging transportation, social media, in-person and videoconference meetings, etc. Additionally, it includes situations which may occur outside of these spaces but may have serious and detrimental impacts on another person, could undermine the integrity of sport, bring the Canadian sport system into disrepute, or could adversely impact relationships or functions across [INSERT NAME OF SPORT ORGANIZATION]. The location is not determinative.
- 3.3** Under the *UCCMS*, *Minor Participants* are defined as individuals who are under the age of 19 years old. It is at all times the responsibility of the adult *Participant* to know the age of a *Minor*.

4. Interpretation

This policy supplements and should be read in alignment with [INSERT NAME OF SPORT ORGANIZATION]'s by-laws, policies, procedures, codes of conduct, including the *UCCMS*, as well as applicable law.

5. Open and Observable Environments¹

All *Participants* must make a concerted effort to avoid situations where a coach, official, or other *Participant* in a position of trust or authority might be alone with a *Minor*, or other *Participant* who is not in a position of trust or authority. All interactions between a *Minor* or *Participant* who is not in a position of trust or authority, and a *Participant* in a position of trust or authority should normally, and wherever possible, be in an environment or space that is both open and observable to others.

Principles of *Open and Observable Environments* strongly recommend that all interactions and communications with *Minors* take place in the presence of at least two responsible adults screened and trained in safe sport *Education* (e.g., a coach, parent, staff, volunteer) at all times. This applies to interactions in virtual and in-person settings.

5.1 Virtual Settings

Participants in a position of trust or authority must also consider *Open and Observable Environments* in virtual settings, which includes the above principles along with the following:

- 5.1.1** When *Minors* are involved, provide awareness to parents, legal guardians or caregivers. Obtain consent for virtual sessions, and discuss activities that are expected to occur.

¹ This section of the policy is guided by the Coaching Association of Canada's Responsible Coaching Movement, which includes the Rule of Two. You can read more about the Responsible Coaching Movement [here](#).

- 5.1.2 Sessions should take place in a professional setting (i.e., not a bedroom) that considers the need for open and observable spaces.
- 5.1.3 Encourage regular check-ins with all *Participants* such as parents, legal guardians, caregivers, coaches, and *Participants* regarding virtual interactions.

5.2 Exceptions to Open and Observable Environments

There are exceptions that may apply to the principles of *Open and Observable Environments*:

- 5.2.1 When there is an emergency situation that may require one-on-one interaction;
- 5.2.2 When a dual relationship or pre-existing relationship exists (e.g., parent/child, legal guardian/child, siblings, etc.); and
- 5.2.3 When a *Minor* requires a personal care assistant.

5.3 Personal Care Assistants

If a parent, legal guardian or caregiver has provided written consent requesting a personal care assistant for their child, the personal care assistant must:

- 5.3.1 Adhere to the *UCCMS* Pledge and fulfill the criteria outlined in the Education and Awareness Policy;
- 5.3.2 Sign an annual form or letter recognizing their involvement as a personal care assistant (outlining their duties and responsibilities); and
- 5.3.3 Fulfill the criteria outlined in [INSERT NAME OF SPORT ORGANIZATION]'s Hiring and Screening Policy.

6. Out of Program Contact

6.1 This policy recognizes that there may be interactions between *Participants* in a position of trust or authority and *Minors* that occur outside of regular program hours (e.g., informal gatherings, team bonding activities, end of the year parties, etc.). These interactions must be conducted in a manner that prioritizes the safety of all *Participants*. The following ensures the safeguarding, transparency and accountability of all:

- 6.1.1 When *Minors* are involved in such activities, transparent written consent and permission (letter or email) is required from parents, legal guardians or caregivers.
- 6.1.2 No person shall be pressured, bullied, or forced into attending out of program interactions.
- 6.1.3 All *Parties* involved shall be open to the possibility of supervision or monitoring from [INSERT NAME OF SPORT ORGANIZATION] during out of program interactions (e.g., ensuring more than one *Participant* in a position of trust or authority is present, sourcing *Participant* feedback on the interaction, etc.).

7. Social Media, Electronic Communications, Photography and Video²

[INSERT NAME OF SPORT ORGANIZATION] is committed to protecting all *Participants* from sexual abuse materials and online sexual exploitation. Therefore, it is essential to maintain responsible and respectful conduct on social media (e.g., Facebook, Twitter/X, Tik Tok, Snapchat, Instagram, etc.), in electronic communications (e.g., texting, email, Zoom, Teams, WhatsApp, etc.), and with photography and video capture, retention, and dissemination, especially where *Minors* are involved. Platforms associated with questionable intent or content are strictly prohibited.

² This section of the policy is guided by the Coaching Association of Canada's Responsible Coaching Movement, which includes the Rule of Two. You can read more about the Responsible Coaching Movement [here](#).

[INSERT NAME OF SPORT ORGANIZATION] recognizes that one-on-one virtual, digital, or online interactions from *Participants* in a position of trust or authority with *Minors* could lead to online *Grooming, Sexting, Sextortion, Capping*, sexual images and videos, or other forms of *Sexual Maltreatment*. The following ensures the safeguarding, transparency and accountability of all *Participants*:

- 7.1 Clear Methods from the Beginning:** The methods of communication and the corresponding expectations regarding interactions between [INSERT NAME OF SPORT ORGANIZATION] and *Participants*, including *Minors* and where suitable, parents, legal guardians or caregivers, will be clearly outlined and communicated at the commencement of each sports season. This documentation ensures that all *Participants* are informed and aligned with the intended approach to communication, fostering transparency and effective engagement throughout the duration of the season.
- 7.2 Initiation of Electronic Messages:** *Participants* in a position of trust or authority are discouraged from initiating personal and private electronic communications or social media activities with *Participants* who are not in a position of trust or authority. Contact initiated by *Minors*, or *Participants* who are not in a position of trust or authority, should be rejected and/or blocked. A conversation with parents, legal guardians or caregivers should occur in the instance of repeated initial and private/personal messaging from *Minors* or *Participants* who are not in a position of trust or authority.
- 7.3 Personal Messaging:** It is encouraged that all messaging occurs through the organization's email addresses, website and platforms during appropriate hours. If text messaging is required between a *Participant* in a position of trust or authority and a *Minor*, all communications must be sent to a group and/or include parents, legal guardians or caregivers of the *Minor*, without one-to-one messaging.
- 7.4 Transparent Communication:** All electronic interactions between *Participants* in a position of trust or authority and *Minors* must be characterized by transparent communication, providing clarity on purpose, objectives, and pertinent information. Electronic communications (e.g., email, text messages, social media, etc.) will be made available upon request from [INSERT NAME OF SPORT ORGANIZATION] and in compliance with provincial/territorial information and privacy laws.
- 7.5 Consistency with Interaction:** Maintaining consistency in engagement is valued within [INSERT NAME OF SPORT ORGANIZATION]. Ensure uniformity in responses to personal "friend" or "follow" requests contributes to a transparent and equitable online environment. Opting not to interact with *Participants*, including *Minors*, on social media is considered an acceptable approach.
- 7.6 Virtual Platforms for Synchronous Events:** Virtual platforms (e.g., Zoom, MS Teams, etc.) should exclusively be employed for pre-approved scheduled events sanctioned by [INSERT NAME OF SPORT ORGANIZATION].
- 7.6.1** For optimal supervision and *Participant* safety, it is recommended that a minimum of two individuals who have taken the UCCMS Pledge and fulfilled the criteria outlined in the Education and Awareness Policy, in a position of trust or authority, be present during these virtual sessions.
- 7.6.2** Sessions conducted on these platforms should be recorded to ensure accountability and to maintain a record of the proceedings.

7.6.3 *Participants* are encouraged to be in observable, open, and appropriate spaces, and in a professional setting (e.g., not bedrooms) when on camera.

7.7 Social Media Engagement: Any *Participant*, including *Minors*, can choose not to engage with other *Participants* on social media, including *Participants* in a position of trust or authority. Information about [INSERT NAME OF SPORT ORGANIZATION] should be widely accessible, and *Participants* should not be required to use social media platforms to obtain this information.

7.8 Disappearing Content and Retention of Electronic Communications: The utilization of platforms featuring disappearing content or content with limited visibility as communication between a *Minor* and a *Participant* in a position of trust or authority, such as Snapchat, Instagram stories or Facebook stories, is discouraged and should be avoided. Online communications and content should be retained and producible upon request and in compliance with privacy laws.

7.8.1 All electronic communications, including on social media, between *Participants* in a position of trust or authority and *Minors* should include:

- a. The transparent written consent (letter or email) of the parent, legal guardian, or caregiver for the *Minor* to receive direct electronic messages;
- b. The transparent written consent (letter or email) of the *Minor* to receive direct electronic messages from *Participants* in a position of trust or authority;
- c. Copying the parent, legal guardian, or caregiver on the electronic communication and exchanges occurring over social media;
- d. In cases where parental, legal guardian, or caregiver consent might change or be revoked, *Participants* in a position of trust or authority shall promptly adjust their communication approach to align with the updated consent status; and
- e. Digital communications shall take place during reasonable hours, and shall be done in accordance with Section 7: Social Media, Electronic Communications, Photography and Video.

7.9 Photography, Video Capture, and Dissemination:

7.9.1 Changing Area Restrictions: No photographs and/or videos should be taken in changing areas, for any reason, including when *Participants* are fully clothed.

7.9.2 Consent Requirement: Prior consent must be obtained from all adult *Participants* depicted in photographs and videos before any content is captured or posted on public online platforms, or used for marketing purposes. This consent underscores the importance of respecting personal boundaries and individual autonomy.

- a. **Where Minors are Involved:** Capturing and posting photographs and videos involving *Minors* shall only and exclusively be allowed if consent is provided by a parent, legal guardian, or caregiver, in addition to the consent from the *Minor*.

7.9.3 Personal Device Usage: The capturing of photographs and videos on personal devices, including smartphones and personal cameras, should be exercised with respect to the privacy and consent of all involved *Parties*. Such activities should be conducted in open and observable settings, ensuring the safety and comfort of all *Participants* (e.g., capturing of a team photo at a soccer field).

7.9.4 Duration: The duration of photographs and videos being made publicly visible should be clearly communicated to *Participants*.

8. Gifting

8.1 Gifts shall only be provided if they are equally distributed to all *Participants* (e.g., all referees, all Board members, all athletes, all coaches, etc.) and serve a purpose (i.e., motivational, recognition, educational, congratulatory, etc.).

8.2 Gifts are not permitted if they are personally given by a *Participant* in a position of trust or authority to another *Participant*.

8.3 Gifts should be

- Minimized and discouraged;
- Equitable;
- Transparent; and
- Distributed in the presence of others.

9. Travelling

9.1 Transportation

Transportation includes, but is not limited to, the personal driving of *Participants*, as well as organized travel on buses, trains, boats, or planes. The following ensures safe, transparent, and accountable transportation:

9.1.1 Consent Requirement: For *Minor Participants*, any event that requires transportation must have prior written consent from parents, legal guardians, or caregivers. [INSERT NAME OF SPORT ORGANIZATION] shall provide details about events requiring transportation, such as, but not limited to:

- a. Purpose of the event;
- b. Number of *Participants*;
- c. Nature of event;
- d. Location of event;
- e. Dates;
- f. Departure and arrival information;
- g. Itinerary; and
- h. Length of stay.

9.1.2 Open and Observable Environments: Principles of *Open and Observable Environments* (Section 5) shall apply to all transportation.

9.1.3 Safety Checks for Personal Vehicles: Safety checks may be requested, as needed, by [INSERT NAME OF SPORT ORGANIZATION] for anyone transporting or responsible for transporting *Participants*. These checks may include, but are not limited to:

- a. Proof of a valid driver's license;
- b. A certificate of insurance;
- c. Information about the safety of the vehicle;
- d. The *UCCMS* Pledge; and
- e. Training requirements outlined in the Education and Awareness Policy.

9.1.4 Travel Insurance: When travelling internationally, a registered travel agent shall be used and travel insurance shall be acquired.

9.1.5 Transportation by Minors: It is strongly recommended that *Minors* are not responsible for driving *Minors*.

- 9.1.6 Weather Conditions:** It is strongly recommended to avoid transportation under weather conditions that are unsafe (e.g., snow storm, heavy rainfall, icy road conditions, tornado warnings, etc.).

9.2 Lodging

Lodging means overnight accommodations such as, but not limited to, hotels, motels, Airbnb, camp sites, etc. The following ensures safe, transparent, and accountable lodging:

- 9.2.1 Maintaining Adequate Ratios of Adults to Minors:** During overnight stays, the ratio of adult *Participants* in a position of trust or authority to *Minors* shall be no less than one *Participant* in a position of trust or authority to five *Minors*.
- 9.2.2 Open and Observable Environments:** Principles of *Open and Observable Environments* (Section 5) shall apply to all lodging and activities taking place at the location of lodging.
- 9.2.3 Room Assignments:** Adult *Participants* in a position of trust or authority must have separate rooms from *Minors* or from *Participants* that are not in a position of trust or authority. In the absence of a power imbalance (i.e., same level of authority), adult *Participants* can share rooms with a *Minor* if they:
- Hold a dual relationship with the *Minor* or *Participant* (i.e., parent/child, legal guardian/child, siblings, etc.);
 - Are a personal care assistant and have been requested by a parent, legal guardian, or caregiver.
- 9.2.4 Room Checks:** Room checks should be conducted jointly by two *Participants* in a position of trust or authority, and they must knock on the door of the room of any *Participant* to request access.
- 9.2.5 Lodging Arrangements:** *Participants* can request lodging arrangements/room choices according to their comfort level, gender identity, sexual diversity and other preferences. The room choices are based on informed consent, ensuring that *Participants* understand their accommodation options, and that they feel safe.