GOLF NEWFOUNDLAND LABRADOR [the "Organization"]
SAFE SPORT POLICY MANUAL

INTRODUCTION

The Organization and its Members have a fundamental responsibility and legal and ethical obligation to protect the health, safety and physical and mental well-being of every individual that is involved in the sport of golf within the Province of Newfoundland and Labrador.

The Organization and its Members take any situation involving misconduct or maltreatment very seriously. For this reason, the Organization and its Members are committed to enacting and enforcing strong, clear, and effective policies and processes for preventing and addressing all forms of misconduct or maltreatment.

The policies are intended to promote a Safe Sport environment in a manner that allows for consistent, immediate, appropriate and meaningful action should any issues arise, but also to prevent issues from arising in the first place by communicating expected standards of behaviour.

Should any individuals involved with the Organization and its Members, including, but not limited to, athletes, coaches, officials, volunteers, and parents/guardians of athletes, wish to report any instance of misconduct or maltreatment, they must do so directly to the Organization, which will then determine the appropriate forum and manner to address the complaint.

The Organization and its Member also recognize the recent development of the Universal Code of Conduct to Prevent and Address Maltreatment in Sport (UCCMS) in 2019. Since the UCCMS may continue to evolve in the foreseeable future, this *Safe Sport Policy Manual* incorporates the key elements of the current version of the UCCMS.

Approved by the Golf NL Board: May 2, 2025

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DEFINITIONS

The terms defined below shall apply to all policies included in this Safe Sport Manual.

1. "*Affected Party*" – Any individual or entity, as determined by the Appeal Manager, who may be affected by a decision rendered under the *Appeal Policy* and who may have recourse to an appeal in their own right
2. "*Appellant*" – The Party appealing a decision
3. "*Appeal Manager*" – An individual, who may be any staff member, committee member, volunteer, Director, or an independent third party, who is appointed to oversee the *Appeal Policy*. The Appeal Manager will have responsibilities that include using decision making authority empowered by the *Appeal Policy*
4. *"Athlete"* – Includes any individual who is a registered to compete for the Organization or a Member
5. *"Board"* – The Board of Directors of the Organization or a Member (as applicable)
6. *"Case Manager"* – An independent individual (or individuals) appointed by the Organization to receive and administer complaints under the *Discipline and Complaints Policy*
7. "*Committee Member*" – an individual elected or appointed to a committee as a member of a committee of the Organization or a Member (as applicable)
8. "*Conflict of Interest*" – Any situation in which an Individuals' decision-making, which should always be in the best interests of the Organization, is influenced or could be influenced by personal, family, financial, business, or other private interests
9. "*Complainant*" – the Party making a complaint
10. "*Criminal Record Check (CRC)*" – A search of the RCMP Canadian Police Information Centre (CPIC) system for adult convictions
11. "*Days*" – Days including weekends and holidays
12. "*Director*" – An individual elected or appointed to act as a Director of the Organization or a Member (as applicable)
13. "*Discipline Chair*" – An individual appointed to handle the duties of the Discipline Chair as described in the *Discipline and Complaints Policy*
14. "*Discrimination*" – Differential treatment of an individual based on one or more prohibited grounds which include race, citizenship, national or ethnic origin, colour, religion, age, sex, sexual orientation, gender identity or expression, marital status, family status, genetic characteristics, or disability
15. "*Enhanced Police Information Check (E-PIC)*" – a Criminal Record Check plus a search of Local Police Information, available from Sterling Backcheck
16. "*Event*" – An event sanctioned by the Organization or by a Member.
17. "*Harassment*" – A course of vexatious comment or conduct against an Individual or group, which is known or ought to reasonably be known to be unwelcome. Types of behaviour that constitute Harassment include, but are not limited to:
    a) Written or verbal abuse, threats, or outbursts;
    b) Persistent unwelcome remarks, jokes, comments, innuendo, or taunts;
    c) Racial harassment, which is racial slurs, jokes, name calling, or insulting behaviour or terminology that reinforces stereotypes or discounts abilities because of racial or ethnic origin;
    d) Leering or other suggestive or obscene gestures;
    e) Condescending or patronizing behaviour which is intended to undermine self-esteem, diminish performance or adversely affect working conditions;
    f) Practical jokes which endanger a person's safety, or may negatively affect performance;

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g) Hazing, which is any form of conduct which exhibits any potentially humiliating, degrading, abusive, or dangerous activity expected of a junior-ranking individual by a more senior individual, which does not contribute to either individual's positive development, but is required to be accepted as part of a team or group, regardless of the junior-ranking individual's willingness to participate. This includes, but is not limited to, any activity, no matter how traditional or seemingly benign, that sets apart or alienates any teammate or group member based on class, number of years on the team or with the group, or ability;
h) Unwanted physical contact including, but not limited to, touching, petting, pinching, or kissing;
i) Deliberately excluding or socially isolating a person from a group or team;
j) Persistent sexual flirtations, advances, requests, or invitations;
k) Physical or sexual assault;
l) Contributing to a poisoned sport environment, which can include:
    i. Locations where material that is discriminatory is displayed (e.g., sexually explicit posters and racial/racist cartoons)
    ii. Groups where harassing behaviour is part of the normal course of activities
    iii. Behaviour that causes embarrassment, awkwardness, endangers a person's safety or negatively affects performance.
m) Behaviours such as those described above that are not directed towards a specific person or group but have the same effect of creating a negative or hostile environment; and
n) Retaliation or threats of retaliation against a person who reports harassment to the Organization or to a Member.

18. "*Individuals*" – Refers to all categories of members and/or registrants defined in the Bylaws of the Organization and in the Bylaws of a Member, as well as all people employed by, contracted by, or engaged in activities with the Organization or a Member including, but not limited to, employees, contractors, Athletes, coaches, instructors, officials, volunteers, managers, administrators, committee members, parents or guardians, spectators, committee members, and Directors and Officers
19. "*Local Police Information (LPI)*" – Additional conviction and selected non-conviction information in national and local police data sources which may be relevant to the position sought
20. "*Maltreatment*" – A volitional act by an Individual that results in harm or the potential for physical or psychological harm to another Individual, and includes any of the following behaviours or conduct:
    a) Psychological Maltreatment: any pattern or single serious incident of deliberate conduct that has the potential to be harmful to the psychological well-being of an Individual. Psychological Maltreatment is determined by the objective behaviour, and not whether harm is intended or results from the behaviour. It includes:
        i. Verbal Acts: verbally assaulting or attacking an Individual, including, but not limited to, unwarranted personal criticisms; body shaming; derogatory comments related to an Individual's identity (e.g., race, gender identity or expression, ethnicity, Indigenous status, ability/disability); comments that are demeaning, humiliating, belittling, intimidating, insulting or threatening; the use of rumours or false statements about an Individual to diminish their reputation; using confidential sport and non-sport information inappropriately. Verbal Maltreatment may also occur in online forms.
        ii. Non-Assaultive Physical Acts (no physical contact): physically aggressive behaviours, including, but not limited to, throwing objects at or in the presence of others without striking another; hitting, striking or punching objects in the presence of others.
        iii. Acts that Deny Attention or Support: acts of commission that deny attention, lack of support or isolation including, but not limited to, ignoring psychological needs or socially

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isolating an Individual repeatedly or for an extended period of time; abandonment of an Athlete as punishment for poor performance; arbitrarily or unreasonably denying feedback, training opportunities, support or attention for extended periods of time and/or asking others to do the same.

b) Physical Maltreatment: any pattern or single serious incident of deliberate conduct that has the potential to be harmful to the physical well-being of an Individual. Physical Maltreatment is determined by the objective behaviour, and not whether harm is intended or results from the behaviour. It includes, without limitation:
    i. Contact behaviours: including, but not limited to, deliberately punching, kicking, beating, biting, striking, strangling or slapping another; deliberately hitting another with an object.
    ii. Non-contact behaviours: including, but not limited to, isolating an Individual in a confined space; forcing an Individual to assume a painful stance or position for no athletic purpose (e.g., requiring an Athlete to kneel on a hard surface); the use of exercise for the purposes of punishment; withholding, recommending against, or denying adequate hydration, nutrition, medical attention or sleep; denying access to a toilet; providing alcohol to an Individual under the legal drinking age; providing illegal drugs or non-prescribed medications to an Individual; encouraging or knowingly permitting an Athlete to return to play prematurely following any injury or after a concussion and without the clearance of a medical professional; encouraging an Athlete to perform a skill for which they are known to not be developmentally ready.

c) Sexual Maltreatment, including, but not limited to, any act targeting an Individual's sexuality, gender identity or expression, that is committed, threatened or attempted against that person, and includes, but is not limited to, the Criminal Code offences of sexual assault, sexual exploitation, sexual interference, invitation to sexual touching, indecent exposure, voyeurism and non-consensual distribution of sexual/intimate images. Sexual Maltreatment also includes sexual harassment and stalking, cyber harassment, and cyber stalking of a sexual nature. Examples of Sexual Maltreatment include, but are not limited to:
    1. Any penetration of any part of a person's body, however slight, with any object or body part by a person upon another person, including, but not limited to:
        1. vaginal penetration by a penis, object, tongue, or finger; and
        2. anal penetration by a penis, object, tongue, or finger.
    2. Any intentional touching of a sexual nature of any part of a person's body, however slight, with any object or body part by a person upon another person, including, but not limited to:
        1. kissing;
        2. intentional touching of the breasts, buttocks, groin or genitals, whether clothed or unclothed, or intentionally touching of another with any of these body parts;
        3. any contact, no matter how slight, between the mouth of one person and the genitalia of another person;
        4. making a person touch themselves or someone else with or on any of the body parts listed in 2); and
        5. any intentional touching in a sexualized manner.

d) Neglect: any pattern or a single serious incident of lack of reasonable care, inattention to an Individual's needs, nurturing or well-being, or omissions in care. Neglect is determined by the objective behaviour, but the behaviour must be evaluated with consideration given to the

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Individual's needs and requirements, not whether harm is intended or results from the behaviour. Neglect, or acts of omission, include without limitation, not providing an Athlete recovery time and/or treatment for a sport injury; not being aware of and not considering an Individual's physical or intellectual disability; not considering supervision of an Athlete during travel, training or competition; not considering the welfare of the Athlete when prescribing dieting or other weight control methods; disregarding the use of prohibited substances by an Athlete; failure to ensure safety of equipment or environment; allowing an Athlete to disregard sport rules, regulations, and standards, or subjecting Individuals to the risk of Maltreatment.

e) Grooming: includes, without limitation, deliberate conduct by an Individual to sexualize a relationship with a Minor, and which includes making inappropriate behaviour seem normal and gradually engaging in 'boundary violations' which have been professionally identified to Canadian standards (e.g., a degrading remark, a sexual joke, sexualized physical contact; adult participants sharing rooms with a Minor who is not an immediate family member; providing a massage or other purported therapeutic interventions with no specific training or expertise; private social media and text communications; sharing personal photographs; shared use of locker rooms; private meetings; private travel; and providing gifts).

f) Interference with or manipulation of process:
    i. An adult Individual violates the *Code of Conduct and Ethics* by directly or indirectly interfering with a process instituted pursuant to this Code or any other policy found in the *Safe Sport Policy Manual* by:
        1. falsifying, distorting, or misrepresenting information, the resolution process, or an outcome;
        2. destroying or concealing information;
        3. attempting to discourage an Individual's proper participation in or use of the processes of the Organization or a Member;
        4. harassing or intimidating (verbally or physically) any person involved in the processes of the Organization or a Member before, during, and/or following any proceedings;
        5. publicly disclosing an Individual's identifying information, without the Individual's agreement;
        6. failing to comply with any temporary or provisional measure or other final sanction;
        7. distributing or otherwise publicizing materials an Individual gains access to during any investigation or hearing, except as required by law or as expressly permitted; or
        8. influencing or attempting to influence another Individual to interfere with or manipulate the process.

g) Retaliation: An Individual shall not take an adverse action against any other Individual for making a good faith report of possible Maltreatment or for participating in any process found in a policy included in the *Safe Sport Policy Manual*. Retaliation includes threatening, intimidating, harassing, coercing or any other conduct that would discourage a reasonable person from engaging or participating in the processes of the Organization or a Member. Retaliation after the conclusion of investigation and sanction processes is also prohibited. Retaliation may be present even where there is a finding that no Maltreatment occurred. Retaliation does not include good-faith actions lawfully pursued in response to a report of possible Maltreatment.

h) Aiding and abetting:

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i. Any act taken with the purpose of facilitating, promoting, or encouraging the commission of Maltreatment by an Individual. Aiding and abetting also includes, without limitation, knowingly:
    1. allowing any person who has been suspended or is otherwise ineligible to be in any way associated with sport or to coach or instruct Individuals;
    2. providing any coaching-related advice or service to an Athlete who has been suspended or is otherwise ineligible; and
    3. allowing any Individual to violate the terms of their suspension or any other sanctions imposed.

i) Failure by an adult Individual to report actual or suspected Maltreatment of a Minor: This obligation is ongoing and is not satisfied by making an initial report; instead, this obligation includes reporting to the Organization or a Member, on a timely basis, all relevant information that the adult Individual is or becomes aware of, and requires making a direct report to the Organization or a Member. Any report shall include the personally identifying information of the potential Minor complainant (to the extent known), and any such information learned at a later date.

j) Failure to report inappropriate conduct: Any Individual who suspects or becomes aware of another Individual's inappropriate conduct, even if it is not defined as Maltreatment, has a duty to report such inappropriate conduct to the Organization or a Member. Individuals in positions of trust and authority who become aware of another Individual's inappropriate conduct have a responsibility for reporting the concern within their organization's policies and procedures.

k) Intentionally filing a false allegation: An allegation is false if the events or conduct reported did not occur and the Individual making the report knows that the events or conduct did not occur. An Individual shall not be considered to have filed a false allegation in cases where the allegation cannot be substantiated by supporting evidence but was nevertheless filed in good faith.

21. "*Members*" – Leagues, clubs and other groups that are members of the Organization
22. "*Minor*" – Any Individual who is under the age of majority at the time and in the jurisdiction where the alleged Maltreatment has occurred. Adults are responsible for knowing the age of majority. For the purpose of protection in Newfoundland and Labrador, the age of majority is defined as 19 years old
23. "*Non-Pecuniary Interest*" - An interest that an individual may have in a matter which may involve family relationships, friendships, volunteer positions or other interests that do not involve the potential for financial gain or loss
24. "*Organization*" – The Provincial Sport Organization
25. "*Parties*" – the groups involved with the particular dispute. In the *Discipline and Complaints Policy*, the Parties are the Complainant and Respondent. In the *Appeal Policy*, the Parties are the Appellant, Respondent, and any Affected Party
26. "*Pecuniary Interest*" - An interest that an individual may have in a matter because of the reasonable likelihood or expectation of financial gain or loss for that individual, or another person with whom that individual is associated
27. "*Person in Authority*" – Any Individual who holds a position of authority within the Organization or a Member including, but not limited to, coaches, instructors, officials, managers, support personnel, chaperones, committee members, and Directors and Officers
28. *"Respondent"* – The party responding to a complaint or, in the case of an appeal, the body whose decision is being appealed
29. "*Sexual Harassment*" – A course of vexatious comment or conduct against an Individual because of sex, sexual orientation, gender identity or gender expression, where the course of comment or conduct is

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known or ought reasonably to be known to be unwelcome; or making a sexual solicitation or advance where the person making the solicitation or advance is in a position to confer, grant or deny a benefit or advance to the Individual and the person knows or ought reasonably to know that the solicitation or advance is unwelcome. Types of behaviour that constitute Sexual Harassment include, but are not limited to:

a) Sexist jokes;
b) Threats, punishment, or denial of a benefit for refusing a sexual advance;
c) Offering a benefit in exchange for a sexual favour;
d) Demanding hugs;
e) Bragging about sexual ability;
f) Leering (persistent sexual staring);
g) Sexual assault;
h) Display of sexually offensive material;
i) Distributing sexually explicit messages or attachments such as pictures or video files;
j) Sexually degrading words used to describe an Individual;
k) Unwelcome inquiries into or comments about an Individual's gender identity or physical appearance;
l) Inquiries or comments about an Individual's sex life;
m) Persistent, unwanted attention after a consensual relationship ends;
n) Persistent unwelcome sexual flirtations, advances, comments or propositions; and
o) Persistent unwanted contact.

30. "*Social media*" – The catch-all term that is applied broadly to new computer-mediated communication media such as blogs, YouTube, Facebook, Instagram, Tumblr, TikTok, Snapchat, and Twitter.
31. "*Vulnerable Individuals*" – Includes Minors and vulnerable adults (people who, because of age, disability or other circumstance, are in a position of dependence on others or are otherwise at a greater risk than the general population of being harmed by people in positions of trust or authority);
32. "*Vulnerable Sector Check (VSC)*" – A detailed check that includes a search of the RCMP Canadian Police Information Centre (CPIC) system, Local Police Information, and the Pardoned Sex Offender database
33. "*Worker*" – Any person who performs work for the Organization or a Member including employees, managers, supervisors, temporary workers, volunteers, student volunteers, part-time workers, the Board of Directors, and independent contractors.
34. "*Workplace*" – Any place where business or work-related activities are conducted. Workplaces include, but are not limited to, the office of the Organization or a Member, work-related social functions, work assignments outside offices, work-related travel, the training and competition environment, and work-related conferences or training sessions
35. *"Workplace Harassment"* – Vexatious comment or conduct against a Worker in a Workplace that is known or ought reasonably to be known to be unwelcome. Workplace Harassment should not be confused with legitimate, reasonable management actions that are part of the normal work/training function, including measures to correct performance deficiencies, such as placing someone on a performance improvement plan, or imposing discipline for workplace infractions. Types of behaviour that constitute Workplace Harassment include, but are not limited to:

a) Bullying;
b) Workplace pranks, vandalism, bullying or hazing;
c) Repeated offensive or intimidating phone calls or emails;
d) Inappropriate sexual touching, advances, suggestions or requests;
e) Displaying or circulating offensive pictures, photographs or materials in printed or electronic form;

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f) Psychological abuse;
g) Excluding or ignoring someone, including persistent exclusion of a person from work-related social gatherings;
h) Deliberately withholding information that would enable a person to do his or her job, perform or train;
i) Sabotaging someone else's work or performance;
j) Gossiping or spreading malicious rumours;
k) Intimidating words or conduct (offensive jokes or innuendos); and
l) Words or actions which are known or should reasonably be known to be offensive, embarrassing, humiliating, or demeaning.

36. "*Workplace Violence*" – The use of or threat of physical force by a person against a worker in a Workplace that causes or could cause physical injury to the worker; an attempt to exercise physical force against a worker in a Workplace that could cause physical injury to the worker; or a statement or behaviour that it is reasonable for a worker to interpret as a threat to exercise physical force against the worker in a Workplace that could cause physical injury to the worker. Types of behaviour that constitute Workplace Violence include, but are not limited to:
    a) Verbal or written threats to attack;
    b) Sending to or leaving threatening notes or emails;
    c) Physically threatening behaviour such as shaking a fist at someone, finger pointing, destroying property, or throwing objects;
    d) Wielding a weapon in a Workplace;
    e) Hitting, pinching or unwanted touching which is not accidental;
    f) Dangerous or threatening horseplay;
    g) Physical restraint or confinement;
    h) Blatant or intentional disregard for the safety or wellbeing of others;
    i) Blocking normal movement or physical interference, with or without the use of equipment;
    j) Sexual violence; and
    k) Any attempt to engage in the type of conduct outlined above.

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SAFE SPORT POLICY

Purpose

1. This Policy describes how the Organization and its Members aim to provide a safe sport environment.

Commitment to True Sport Principles

2. The Organization and its Members commit to the True Sport Principles which are:
    a) **Go for It –** Rise to the challenge – always strive for excellence. Discover how good you can be.
    b) **Play Fair –** Play honestly – obey both the letter and spirit of the rules. Winning is only meaningful when competition is fair.
    c) **Respect Others –** Show respect for everyone involved in creating your sporting experience, both on and off the field. Win with dignity and lose with grace.
    d) **Keep it Fun –** Find the joy of sport. Keep a positive attitude both on and off the field.
    e) **Stay Healthy –** Place physical and mental health above all other considerations – avoid unsafe activities. Respect your body and keep in shape.
    f) **Include Everyone –** Share sport with others. Ensure everyone has a place to play.
    g) **Give Back –** Find ways to show your appreciation for the community that supports your sport and helps make it possible.

Pledge

3. The stakeholders, members, and leaders of the Organization and its Members are expected to live the True Sport Principles and the Organization and its Members pledge to embed the True Sport Principles in their governance and operations in the following ways:
    a) Conduct Standards – the Organization and its Members will adopt comprehensive conduct standards that are expected to be followed by Individuals
    b) Athlete Protection – the Organization and its Members will provide coaches and other stakeholders with general and sport-specific athlete protection guidelines
    c) Dispute Resolution and Investigations – the Organization and its Members will have dispute resolution processes that are confidential and procedurally fair and that require independent investigation for certain alleged violates of the conduct standards
    d) Strategy – the Organization and its Members will have strategic plans that reflects the organization's mission, vision, and values
    e) Governance – the Organization and its Members will have a diverse blend of sport leaders and will adhere to principles of good governance
    f) Risk Management – the Organization and its Members will intentionally manage risks to its operations and events through the use of risk management plans and/or risk registries

Conduct Standards

4. The Organization and its Members will adopt a *Code of Conduct and Ethics* that describes standards of conduct and behaviour for all Individuals. General standards of conduct will apply to all Individuals and specific standards will be described for positions within the organization. The *Code of Conduct and Ethics* will have specific sections, including but not limited, to:
    a) Athletes

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b) Coaches
c) Officials
d) Volunteers
e) Directors and Committee Members
f) Parents and Spectators

5. The *Safe Sport Policy Manual* will contain detailed definitions of key terms, including:
    a) Harassment
    b) Sexual Harassment
    c) Workplace Harassment
    d) Workplace Violence
    e) Discrimination
    f) Hazing

6. The Organization and its Members will adopt an *Abuse Policy* that will define "vulnerable individuals" and describe the types of abuse (e.g., Physical Abuse, Sexual Abuse, Emotional Abuse, and Neglect) that vulnerable individuals may be subjected to.

Anti-Doping

7. The *Code of Conduct and Ethics* will indicate that the Organization and its Members adopt and adhere to the Canadian Anti-Doping Program.

Social Media

8. The Organization and its Members will adopt a *Social Media Policy* that describes standards of conduct that are expected on social media by Individuals. The *Social Media Policy* will indicate specific conduct standards and risks that are common and/or exclusive to social media.

9. The *Social Media Policy* will highlight the importance of responsible coach-athlete interaction on social media and will provide examples of violations of conduct standards.

Athlete Protection

Screening

10. The Organization and its Members will adopt a comprehensive *Screening Policy* that requires some Individuals to pass a screening process before being permitted to interact with athletes. The *Screening Policy* will:
    a) Categorize positions in the organization as 'Low Risk', 'Medium Risk', and 'High Risk' and require progressive screening measures for individuals serving in each category of risk
    b) Describe how frequently some Individuals must obtain a police records check and which type of check(s) they must obtain
    c) Describe how frequently some Individuals must submit Screening Disclosure Forms and Screening Renewal Forms
    d) Empower a Screening Committee to prohibit Individuals who do not pass screening from participating in certain positions
    e) Empower a Screening Committee to attach conditions to an Individual's participation in certain positions

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11. The Organization and its Members will develop an *Athlete Protection Policy* that can be used by coaches, managers, medical personnel, and other persons in authority. The Organization and its Members may provide training on the policy and take steps to ensure the policy is being implemented. The Organization and its Members will conduct a regular review of the guidelines to add and/or modify new guidelines as appropriate.

Resources

12. The Organization and its Members will regularly provide information to Individuals about resources and training related to athlete protection. Resources and training opportunities can include:
    a) NCCP modules
    b) Respect in Sport
    c) Commit to Kids
    d) Red Cross – Respect Education Courses

Athlete Engagement

13. The Organization and its Members will engage with athletes to determine the level of success of their athlete protection measures as well as to identify any gaps or athlete concerns. This engagement may take the form of:
    a) Anonymous athlete surveys
    b) Athlete involvement in organizational decision-making
    c) Independently led athlete outreach consultations

Dispute Resolution

14. The Organization and its Members will have a comprehensive suite of dispute resolution policies that will include:
    a) *Discipline and Complaints Policy*
    b) *Appeal Policy*
    c) *Dispute Resolution Policy*
    d) *Investigations Policy*
    e) *Event Discipline Procedure*
    f) *Whistleblower Policy*

15. Taken together, the suite of dispute resolution policies will include the following features:
    a) An independent individual to whom complaints can be submitted
    b) Sanctions for violations of conduct standards
    c) Mechanism for suspension of individuals pending the conclusion of the process
    d) Non-biased and experienced case managers, decision-makers and/or investigators
    e) Protection from reprisal for submitting complaints
    f) Anonymity for the complainant in cases of whistleblowers (when possible)
    g) Independency of appeal procedures (when appeals are permitted)
    h) Opportunity for alternate dispute resolution
    i) Investigations of certain complaints (e.g., when required by law and/or when the complaint involves harassment, abuse, or discrimination)
    j) In-event discipline procedures (when an event does not have its own disciplinary procedures)

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Alignment

16. The Organization and its Members recognize the importance of safe sport for athletes and participants across the country. The Organization and its Members will adopt a *Reciprocation Policy* that will require:
    a) Members to report discipline decisions to the Organization
    b) The distribution of discipline decisions to all applicable Members
    c) Recognition and enforcement of sanctions imposed by the Organization or by a Member.

Obligations – Reporting and Third-Party Case Management

17. The policies of the Organization and its Members will include requirements that certain complaints must be reported to government entities, local police forces, and/or child protection agencies.

18. The policies of the Organization and its Members will include requirements that certain complaints (e.g., those related to harassment, discrimination, and abuse) must be handled by third party that has no conflict of interest or bias.

Records

19. The Organization and its Members will retain records of decisions that have been made pursuant to the organization's policies. These records may be shared with other individuals or organizations, including but not limited to, national sport organizations, provincial sport organizations, multi-sport organizations, and government entities.

Governance and Operations

20. The Organization and its Members will have a comprehensive plan in which athlete protection and safe sport are top priorities for the organization.

21. The Organization and its Members will adopt a *Risk Management Policy* that will describe how the organization will address risks ranging from 'Unlikely' to 'Almost Certain' and from 'Minor' to 'Catastrophic'. The Organization and its Members will contemplate risk management strategies that retain, reduce, transfer, and/or avoid the risk. Risks can occur in the following areas:
    a) Operational/Program
    b) Compliance
    c) Communication
    d) External
    e) Governance
    f) Financial
    g) Health and Safety

22. The Organization and its Members will pursue a governance structure and organizational culture that reflects the diversity of the athletes and stakeholders within the sport, that adheres to all applicable federal and/or provincial/territorial legislation, and that moves toward a national alignment strategy for the sport in Canada.

23. The Organization and its Members will continually monitor and evaluate its policies, practices, and procedures.

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Policy History	
Approved	April 28 2025
Next Review Date	
Revision Approval Dates	

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ATHLETE PROTECTION POLICY

Purpose

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

Interactions between Persons in Authority and Athletes – the 'Rule of Two'

2. The Organization and its Members strongly recommend the 'Rule of Two' for all Persons in Authority who interact with Athletes. The Coaching Association of Canada describes the intention of the 'Rule of Two' as follows:

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

3. The Organization and its Members recognize that fully implementing the 'Rule of Two', as described above (and modified accordingly for Persons in Authority), in all circumstances, may not always be possible. Consequently, at a minimum, interactions between Persons in Authority and Athletes must respect the following:
    a) The training environment should be open and transparent so that all interactions between Persons in Authority and Athletes are observable
    b) Private or one-on-one situations must be avoided unless they are open and observable by another adult or Athlete
    c) Persons in Authority shall not invite or have a Vulnerable Individual (or Vulnerable Individuals) in their home without the written permission and knowledge of the Vulnerable Individual's parent or guardian
    d) Vulnerable Individuals must not be in any situation where they are alone with a Person in Authority without another screened adult or Athlete present unless prior written permission is obtained from the Athlete's parent or guardian

Practices and Competitions

4. As it relates to practices and/or competitions, the following shall be respected:
    a) A Person in Authority should never be alone with a Vulnerable Individual prior to or following a competition or practice unless the Person in Authority is the Athlete's parent or guardian
    b) If the Vulnerable Individual is the first Athlete to arrive, the Athlete's parent should remain until another Athlete or Person in Authority arrives
    c) If a Vulnerable Individual would potentially be alone with a Person in Authority following a competition or practice, the Person in Authority should ask another Person in Authority (or a parent or guardian of another Athlete) to stay until all of the Athletes have been picked up. If an adult is

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unavailable, another Athlete, who is preferably not a Vulnerable Individual, should be present in order to avoid the Person in Authority being alone with a Vulnerable Individual

d) Persons in Authority giving instructions, demonstrating skills, or facilitating drills or lessons to an individual Athlete should always do so within earshot and eyesight of another Person in Authority
e) When observing the Rule of Two is not possible due to training or competition circumstances, Persons in Authority and Athletes should take additional steps to achieve transparency and accountability in their interactions. For example, a Person in Authority and an Athlete who know they will be away from other Individuals for a lengthy period of time must inform another Person in Authority where they are going and when they are expected to return. Persons in Authority should always be reachable by phone or text message

Communications

5. Communications between Persons in Authority and Athletes should respect the following:
    a) Group messages, group emails or team pages are to be used as the regular method of communication between Persons in Authority and Athletes
    b) Persons in Authority may only send texts, direct messages on social media or emails to individual Athletes when necessary and only for communicating information related to team issues and activities (e.g., non-personal information). Any such texts, messages or emails shall be professional in tone
    c) Electronic communication between Persons in Authority and Athletes that is personal in nature should be avoided. If such communication occurs, it must be recorded and available for review by another Person in Authority and/or by the Athlete's parent/guardian
    d) Parents and guardians may request that their child not be contacted by a Person in Authority using any form of electronic communication and/or to request that certain information about their child may not be distributed in any form of electronic communications
    e) All communication between a Person in Authority and Athletes must be between the hours of 6:00a.m. and midnight unless extenuating circumstances justify otherwise
    f) Communications concerning drugs or alcohol use (unless regarding its prohibition) is not permitted
    g) No sexually explicit language or imagery or sexually oriented conversation may be communicated in any medium
    h) Persons in Authority are not permitted to ask Athletes to keep a secret for them

Travel

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

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Locker Room/Changing Areas

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

Photography/Video

8. Any photograph or video involving an Athlete shall respect the following:
    a) Photographs and video may only be taken in public view, must observe generally accepted standards of decency, and be both appropriate for and in the best interest of the Athlete
    b) The use of recording devices of any kind in rooms where there is a reasonable expectation of privacy is strictly prohibited
    c) Examples of photos that shall be edited or deleted include:
        i. Images with nudity or where undergarments are showing
        ii. Suggestive or provocative poses
        iii. Embarrassing images
    d) If any photographs or videos will be used on any form of public media, an Image Consent Form (**Appendix A**) must be completed before any images are taken and used

Physical Contact

9. It is recognized that some physical contact between Persons in Authority and Athletes may be necessary for various reasons including, but not limited to, teaching a skill or tending to an injury. Any physical contact shall respect the following:
    a) Unless it is otherwise impossible because of serious injury or other justifiable circumstance, a Person in Authority must always clarify with an Athlete where and why any physical contact will occur prior to the contact occurring. The Person in Authority must make clear that he or she is requesting to touch the Athlete and not requiring physical contact
    b) Infrequent, non-intentional physical contact during a training session is permitted
    c) Hugs lasting longer than five seconds, cuddling, physical horseplay, and physical contact initiated by the Person in Authority is not permitted. It is recognized that some Athletes may initiate hugging or other physical contact with a Person in Authority for various reasons (e.g., such as celebrating or crying after a poor performance), but this physical contact should always be limited to circumstances where the Person in Authority believes it is in the best interest of the Athlete and when it occurs in an open and observable environment.

Enforcement

10. Any alleged violations of this *Athlete Protection Policy* shall be addressed pursuant to the *Discipline and Complaints Policy*.

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Approved	April 28 2025
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Appendix A – Image Consent Form

Name of Participant (print): _____

1. I hereby grant to GOLF NEWFOUNDLAND LABRADOR and the Organization (collectively the "Organizations") on a worldwide basis, the permission to photograph and/or record the Participant's image and/or voice on still or motion picture film and/or audio tape (collectively the "Images"), and to use the Images to promote the sport and/or the Organizations through traditional media such as newsletters, websites, television, film, radio, print and/or display form, and through social media such as Instagram, Facebook, YouTube, and Twitter. I understand that I waive any claim to remuneration for use of audio/visual materials used for these purposes. This consent will remain in effect in perpetuity.

2. I hereby fully release, discharge, and agree to save harmless the Organizations, for any and all claims, demands, actions, damages, losses or costs that might arise out of the collection, use or disclosure of the Images or taking, publication, distortion of the Images, negatives, and masters or any other likeness or representation of the Participant that may occur or be produced in the taking of said Images or in any subsequent processing thereof, including without limitation any claims for libel, passing off, misappropriation of personality or invasion of privacy.

3. **I UNDERSTAND AND AGREE**, that I have read and understood the terms and conditions of this document. On behalf of me, my heirs and assigns, I agree that I am signing this document voluntarily and to abide by such terms and conditions.

Signature of Participant: _____

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

Signature of Parent/Guardian: _____

Date: _____

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GOLF NEWFOUNDLAND LABRADOR ['THE ORGANIZATION']
CODE OF CONDUCT AND ETHICS

Purpose

1. The purpose of this Code is to ensure a safe and positive environment within the programs, activities, and events of the Organization and its Members by making Individuals aware that there is an expectation, always, of appropriate behaviour consistent with the applicable organization's core values and policies. The Organization and its Members support equal opportunity, prohibit discriminatory practices, and are committed to providing an environment in which all individuals can safely participate in sport and are treated with respect and fairness.

Application of this Code

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

Responsibilities

7. Individuals have a responsibility to:
   a. Refrain from any behaviour that constitutes Maltreatment, as defined in the UCCMS and amended from time to time.
   b. Maintain and enhance the dignity and self-esteem of members and other individuals by:
      i. Treating each other with the highest standards of respect and integrity;
      ii. Focusing comments or criticism appropriately and avoiding public criticism of Athletes, coaches, officials, organizers, volunteers, employees, or other participants;

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iii. Consistently demonstrating the spirit of sportsmanship, sport leadership, and ethical conduct;
iv. Acting, when appropriate, to correct or prevent practices that are unjustly discriminatory;
v. Consistently treating individuals fairly and reasonably; and
vi. Ensuring adherence to the rules of the sport and the spirit of those rules.

c. Refrain from any behaviour that constitutes Harassment, Workplace Harassment, Sexual Harassment, Workplace Violence, Discrimination, or any form of Maltreatment
d. Abstain from the non-medical use of medications or drugs or the use of Prohibited Substances or Prohibited Methods as listed on the version of the World Anti-Doping Agency's Prohibited List currently in force. More specifically, the Organization and its Members adopt and adhere to the Canadian Anti-Doping Program. The Organization and its Members will respect any sanction imposed on an Individual as a result of a breach of the Canadian Anti-Doping Program or any other applicable Anti-Doping Rules
e. Refrain from associating with any person for the purpose of coaching, training, competition, instruction, administration, management, athletic development, or supervision, who has been found to have committed an anti-doping rule violation and is serving a period of ineligibility imposed pursuant to the Canadian Anti-Doping Program or any other applicable Anti-Doping Rules
f. Refrain from the use of power or authority in an attempt to coerce another person to engage in inappropriate activities
g. Refrain from consuming tobacco products, cannabis, or recreational drugs while participating in the programs, activities, competitions, or events of the Organization or a Member;
h. In the case of minors, not consume alcohol, tobacco, or cannabis at any competition or event;
i. In the case of adults, not consume cannabis in the Workplace or in any situation associated with the events of the Organization or a Member (subject to any requirements for accommodation), not consume alcohol during competitions and in situations where minors are present, and take reasonable steps to manage the responsible consumption of alcohol in adult-oriented social situations
j. When driving a vehicle for Organization activities:
    i. Not have his or her license suspended;
    ii. Not be under the influence of alcohol, cannabis, or illegal drugs or substances;
    iii. Have valid car insurance; and
    iv. Refrain from using a mobile device.
    v. Respect the property of others and not willfully cause damage
    vi. Respect any additional requirements for drivers, as established by the Organization.
k. Promote sport in the most constructive and positive manner possible
l. Refrain from engaging in deliberate cheating which is intended to manipulate the outcome of a para-classification, competition and/or not offer or receive any bribe which is intended to manipulate the outcome of a competition
m. Adhere to all federal, provincial, territorial, municipal and host country laws
n. Comply, at all times, with the bylaws, policies, procedures, and rules and regulations of the Organization and its Members (as applicable) and as adopted and amended from time to time

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o. Report any ongoing criminal or anti-doping investigation, conviction, or existing bail conditions involving an Individual to the Organization 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

Directors, Committee Members, and Staff

8. In addition to section 7 (above), Directors, Committee Members, and Staff of the Organization and its Members will have additional responsibilities to:
   a. Function primarily as a Director or Committee Member or Staff of the Organization or a Member (as applicable) and not as a member of any other member or constituency
   b. Ensure their loyalty prioritizes the interests of the Organization or the Member (as applicable)
   c. Ensure that financial affairs are conducted in a responsible and transparent manner with due regard for all fiduciary responsibilities
   d. Comply with the Screening Policy
   e. Conduct themselves openly, professionally, lawfully and in good faith
   f. Be independent and impartial and not be influenced by self-interest, outside pressure, expectation of reward, or fear of criticism
   g. Behave with decorum appropriate to both circumstance and position
   h. Exercise the degree of care, diligence, and skill required in the performance of their duties pursuant to applicable laws
   i. Respect the confidentiality appropriate to issues of a sensitive nature
   j. Respect the decisions of the majority and resign if unable to do so
   k. Commit the time to attend meetings and be diligent in preparation for, and participation in, discussions at such meetings
   l. Have a thorough knowledge and understanding of all governance documents

Coaches and Instructors

9. In addition to section 7 (above), coaches and instructors have many additional responsibilities. The coach-Athlete relationship is a privileged one and plays a critical role in the personal, sport, and athletic development of the Athlete. Coaches must understand and respect the inherent power imbalance that exists in this relationship and must be extremely careful not to abuse it, either consciously or unconsciously. Coaches and instructors will:
   a. Ensure a safe environment by selecting activities and establishing controls that are suitable for the age, experience, ability, and fitness level of the Athletes
   b. Prepare Athletes systematically and progressively, using appropriate time frames and monitoring physical and psychological adjustments while refraining from using training methods or techniques that may harm Athletes
   c. Avoid compromising the present and future health of Athletes by communicating and cooperating with sport medicine professionals in the diagnosis, treatment, and management of Athletes' medical and psychological treatments

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d. Support the coaching staff of a training camp, territorial team, or national team, should an Athlete qualify for participation with one of these programs
e. Accept and promote Athletes' personal goals and refer Athletes to other coaches and sport specialists as appropriate
f. Provide Athletes (and the parents/guardians of minor Athletes) with the information necessary to be involved in the decisions that affect the Athlete
g. Act in the best interest of the Athlete's development as a whole person
h. Comply with the Screening Policy
i. Report any ongoing criminal or anti-doping investigation, conviction, or existing bail conditions to the Organization or a Member (as applicable), including those for violence, child pornography, or possession, use, or sale of any illegal or prohibited substance or method
j. Under no circumstances provide, promote, or condone the use of drugs (other than properly prescribed medications) or prohibited substances or prohibited methods and, in the case of Minors, alcohol, cannabis, and/or tobacco
k. Respect Athletes competing for other jurisdictions and, in dealings with them, not encroach upon topics or actions which are deemed to be within the realm of 'coaching', unless after first receiving approval from the coaches who are responsible for the Athletes
l. Not engage in a sexual or intimate relationship with an Athlete of any age in which the coach is in a position of trust or authority
m. Recognize the power inherent in the position of coach and respect and promote the rights of all participants in sport. This is accomplished by establishing and following procedures for confidentiality (right to privacy), informed participation, and fair and reasonable treatment. Coaches have a special responsibility to respect and promote the rights of participants who are in a vulnerable or dependent position and less able to protect their own rights
n. Dress professionally[1]
o. Use inoffensive language, taking into account the audience being addressed

Athletes

10. In addition to section 7 (above), Athletes will have additional responsibilities to:
    a. Adhere to their Athlete Agreement (if applicable)
    b. Report any medical problems in a timely fashion to the Organization or the Member (as applicable), when such problems may limit their ability to travel, practice, or compete
    c. Participate and appear on time and prepared to participate to their best abilities in all competitions, practices, training sessions, and evaluations
    d. Properly represent themselves and not attempt to participate in a competition for which they are not eligible by reason of age, classification, or other reason
    e. Adhere to any rules and requirements regarding clothing and equipment

[1] Sport NL recognizes that dressing professionally may be a socio-economic barrier for some participants and encourage any individuals who have concerns about this conduct standard to request support from Sport NL.

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f. Dress to represent the sport and themselves with professionalism.[2]
g. Act in accordance with applicable policies and procedures and, when applicable, additional rules as outlined by coaches or managers

Officials

11. In addition to section 7 (above), officials will have additional responsibilities to:
    a. Maintain and update their knowledge of the rules and rule changes
    b. Not publicly criticize other officials
    c. Work within the boundaries of their position's description while supporting the work of other officials
    d. Act as an ambassador of the sport by agreeing to enforce and abide by national and provincial rules and regulations
    e. Take ownership of actions and decisions made while officiating
    f. Respect the rights, dignity, and worth of all Individuals
    g. Act openly, impartially, professionally, lawfully, and in good faith
    h. Be fair, equitable, considerate, independent, honest, and impartial in all dealings with others
    i. Respect the confidentiality required by issues of a sensitive nature, which may include discipline processes, appeals, and specific information or data about Individuals
    j. Comply with the Screening Policy
    k. Honour all assignments unless unable to do so by virtue of illness or personal emergency, and in these cases inform a supervisor or the Organization or the Member (as applicable) at the earliest possible time
    l. When writing reports, set out the actual facts to the best of their knowledge and recollection
    m. Dress in proper attire for officiating

Parents/Guardians and Spectators

12. In addition to section 7 (above), parents/guardians and spectators at events will:
    a. Encourage Athletes to compete within the rules and to resolve conflicts without resorting to hostility or violence
    b. Condemn the use of violence in any form
    c. Never ridicule a participant for making a mistake during a competition or practice
    d. Respect the decisions and judgments of officials, and encourage Athletes to do the same
    e. Support all efforts to remove verbal and physical abuse, coercion, intimidation, and sarcasm
    f. Respect and show appreciation to all competitors, and to coaches, officials and other volunteers
    g. Never harass competitors, coaches, officials, parents/guardians, or other spectators

Organizations

13. The Organization and its Members will:
    a. Adhere to all of the Organization's governing documents and for Members, where necessary, amend their own rules to comply or align with those of the Organization

[2] See Footnote 1.

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b. For Members, recognize that their websites, blogs and social media accounts may be seen as extensions of the Organization and must reflect the Organization's mission, vision and values
c. Ensure that all Athletes and coaches participating in sanctioned competitions and events of the Organization are registered and in good standing
d. Have well-defined hiring practices and standards in place including interviews, reference checks, and screening procedures to ensure Athletes have a healthy and safe sport environment
e. Ensure that any possible or actual misconduct is investigated promptly and thoroughly
f. Impose appropriate disciplinary or corrective measures when misconduct has been substantiated, regardless of the position or authority of the offender
g. For Members, advise the Organization immediately of any situation where a complainant has publicized a complaint in the media
h. For Members, provide the Organization with a copy of all decisions rendered pursuant to its policies for complaints and appeals

Subjecting an Individual to Maltreatment

14. It is a violation of this Code for any Person in Authority to place an Individual in a situation that makes them vulnerable to Maltreatment. This includes, but is not limited to, instructing an Athlete and a coach to share a hotel room when traveling, hiring a coach who has a past history of Athlete Maltreatment, assigning guides and other support staff to an Athlete when the guide or support staff has a reputation for Athlete Maltreatment, or assigning such a guide or support staff to an Athlete in the absence of consultation with the Athlete.

Policy History	
Approved	April 28 2025
Next Review Date	
Revision Approval Dates	

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ABUSE POLICY

Purpose

1. The Organization and its Members are committed to a sport environment free from abuse. The purpose of this Policy is to stress the importance of that commitment by educating Individuals about abuse, outlining how the Organization and its Members will work to prevent abuse, and how abuse or suspected abuse can be reported to and addressed by the Organization and its Members.

Zero Tolerance Statement

2. The Organization and its Members have zero tolerance for any type of abuse. Individuals are required to report instances of abuse or suspected abuse to the Organization or a Member to be immediately addressed under the terms of the applicable policy.

Education – What is Abuse

3. Individuals can be abused in different forms.

4. An abuser may use a number of different tactics to gain access to children, exert power and control over them, and prevent them from telling anyone about the abuse or seeking support. The abuse may happen once, or it may occur in a repeated and escalating pattern over a period of months or years. The abuse may change over time.

5. Abuse of children or youth in sport can include emotional maltreatment, neglect, and physical maltreatment.

6. Importantly, emotional and physical maltreatment does not include professionally accepted coaching methods (per the NCCP) of skill enhancement, physical conditioning, team building, discipline, or improving athletic performance.

7. Potential warning signs of abuse of children or youth can include:
    a) Recurrent unexplained injuries
    b) Alert behaviour; child seems to always be expecting something bad to happen
    c) Often wears clothing that covers up their skin, even in warm weather
    d) Child startles easily, shies away from touch or shows other skittish behaviour
    e) Constantly seem fearful or anxious about doing something wrong
    f) Withdrawn from peers and adults
    g) Behavior fluctuates between extremes (e.g., extremely cooperative or extremely demanding)
    h) Acting either inappropriately beyond their age (like an adult; taking care of other children) or inappropriately younger than their age (like an infant; throwing tantrums)
    i) Acting out in an inappropriate sexual way with toys or objects
    j) New adult words for body parts and no obvious source
    k) Self-harm (e.g., cutting, burning or other harmful activities)
    l) Not wanting to be alone with a particular child or young person

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Vulnerable Adult Abuse

8. Although individuals may be abused at virtually any life stage – childhood, adolescence, young adulthood, middle age, or old age – the nature and consequences of abuse may differ depending on an individual's situation, disability, or circumstance.

9. Abuse of vulnerable adults is often described as a misuse of power and a violation of trust. Abusers may use a number of different tactics to exert power and control over their victims. Abuse may happen once, or it may occur in a repeated and escalating pattern over months or years. The abuse may take many different forms, which may change over time.

10. Potential warning signs of abuse of vulnerable adults can include:
    a) Depression, fear, anxiety, passivity
    b) Unexplained physical injuries
    c) Dehydration, malnutrition, or lack of food
    d) Poor hygiene, rashes, pressure sores
    e) Over-sedation

Preventing Abuse

11. The Organization and its Members will enact measures aimed at preventing all types of abuse. These measures include screening, orientation, training, practice, and monitoring.

Screening

12. Individuals who coach, volunteer, officiate, deliver developmental programs, accompany a team to an event or competition, are paid staff, or otherwise engage with Vulnerable Individuals involved with the Organization and its Members will be screened according to the organization's *Screening Policy*.

13. The Organization and its Members will use the *Screening Policy* to determine the level of trust, authority, and access that each individual has with Vulnerable Individuals. Each level of risk will be accompanied by increased screening procedures which may include the following, singularly or in combination:
    a) Completing an Application Form for the position sought (which includes alerting Individuals that they must agree to adhere with the organization's policies and procedures (including this *Abuse Policy*))
    b) Completing a Screening Declaration Form
    c) Providing letters of reference
    d) Providing a Criminal Record Check ("CRC") and/or Vulnerable Sector Check ("VSC")
    e) Providing a driver's abstract
    f) Other screening procedures, as required

14. An Individual's failure to participate in the screening process or pass the screening requirements as determined by a Screening Committee, will result in the Individual's ineligibility for the position sought.

Orientation and Training

15. The Organization and its Members may deliver orientation and training to those Individuals who have access to, or interact with, Vulnerable Individuals. The orientation and training, and their frequency, will be based on the level of risk, as described in the *Screening Policy*.

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16. Orientation may include, but is not limited to introductory presentations, facility tours, equipment demonstrations, parent/athlete meetings, meetings with colleagues and supervisors, orientation manuals, orientation sessions, and increased supervision during initial tasks or period of engagement.

17. Training may include, but is not limited to certification courses, online learning, mentoring, workshop sessions, webinars, on-site demonstrations, and peer feedback.

18. At the conclusion of the orientation and training, Individuals may be required to acknowledge, in written form, that they have received and completed the training.

Practice

19. When Persons in Authority interact with Vulnerable Individuals, they may be required to enact certain practical approaches to these interactions. These include, but are not limited to:
    a) Limiting physical interactions to non-threatening or non-sexual touching (e.g., high-fives, pats on the back or shoulder, handshakes, specific skill instruction, etc.)
    b) Ensuring that Vulnerable Individuals are always supervised by more than one Person in Authority
    c) Ensuring that more than one person is involved with team selection (thereby limiting the consolidation of power onto one Individual)
    d) Including parents/guardians in all communication (e.g., electronic, telephonic) with Vulnerable Individuals
    e) Ensuring that parents/guardians are aware that some non-personal communication between Persons in Authority and Vulnerable Individuals (e.g., coaches and athletes) may take place electronically (e.g., by texting) and that this type of communication is now considered to be commonplace, especially with older Vulnerable Individuals (e.g., teenagers). Individuals are aware that such communication is subject to the *Code of Conduct and Ethics* and *Social Media Policy*.
    f) When traveling with Vulnerable Individuals, the Person in Authority will not transport Vulnerable Individuals without another adult present and will not stay in the same overnight accommodation location without another adult present.

Monitoring

20. The Organization and its Members will regularly monitor those Individuals who have access to, or interact with, Vulnerable Individuals. The monitoring will be based on the level of risk, as described in the *Screening Policy*.

21. Monitoring may include, but is not limited to: regular status reports, logs, supervisor meetings, supervisor on-site check-ins, feedback provided directly to the organization (from peers and parents/athletes), and regular evaluations.

Reporting Abuse

22. Reports of abuse that are shared confidentially with an Individual by a Vulnerable Individual may require the Individual to report the incident to parents/guardians, the Organization or a Member, or police. Individuals must respond to such reports in a non-judgemental, supportive and comforting manner but must also explain that the report may need to be escalated to the proper authority or to the Vulnerable Individual's parent/guardian.

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23. Complaints or reports that describe an element of **abuse** will be addressed by the process(es) described in the *Discipline and Complaints Policy* and the *Investigations Policy*.

Policy History	
Approved	April 28 2025
Next Review Date	
Revision Approval Dates	

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GOLF NEWFOUNDLAND LABRADOR ['THE ORGANIZATION']

DISCIPLINE AND COMPLAINTS POLICY

Purpose

1. Individuals are expected to fulfill certain responsibilities and obligations including, but not limited to, complying with the policies, Bylaws, rules and regulations of the Organization and its Members (as applicable). Non-compliance may result in the imposition of sanctions pursuant to this Policy.

Application of this Policy

2. This Policy applies to all Individuals.

3. This Policy applies to matters that may arise during the business, activities, and events of the Organization and its Members (as applicable) including, but not limited to, competitions, practices and training, treatment or consultations (e.g., massage therapy), camps and clinics, travel associated with the activities of the Organization or a Member, events hosted by the Organization and its members, the office environment and any meetings.

4. This Policy also applies to Individuals' conduct outside of the business, activities, and events of the Organization and its Members (as applicable) when such conduct adversely affects the relationships of the Organization and/or a Member (and the work and sport environment) or is detrimental to the image and reputation of the Organization or a Member. Accordingly, applicability of this Policy will be determined by the Independent Third Party, who may consult with the Organization or a Member in making this determination.

5. This Policy applies to alleged breaches of the *Code of Conduct and Ethics* by Individuals who are no longer active in the sport where any claim regarding a potential breach of the *Code of Conduct and Ethics* occurred when the Individual was active in the sport.

6. In addition, this Policy will apply to breaches of the *Code of Conduct and Ethics* that occurred when the Individuals involved interacted due to their mutual involvement in the sport or, if the breach occurred outside of the sport environment, if the breach has a serious and detrimental impact on the Individual(s).

7. Applicability of this Policy will be determined by the Independent Third Party at its sole discretion and shall not be subject to appeal.
8. In the event that it is considered appropriate or necessary on the basis of the circumstances, immediate discipline or the imposition of a sanction or provisional measure may be applied, after which further discipline or sanctions may be applied according to this Policy. Any infractions or complaints occurring within competition will be dealt with by the procedures specific to the competition, if applicable. In such situations, disciplinary sanctions may be for the duration of the competition, training, activity, or event

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only.

9. In addition to being subject to disciplinary action pursuant to this *Discipline and Complaints Policy*, an employee of the Organization or a Member who is a Respondent to a complaint may also be subject to consequences in accordance with the employee's Employment Agreement or policies for human resources, if applicable.

Minors

10. Complaints may be brought for or against an Individual who is a Minor. Minors must have a parent/guardian or other adult serve as their representative during this process.

11. Communication from the Case Manager, Discipline Chair or Discipline Panel (as applicable) must be directed to the Minor's representative.

12. A Minor is not required to attend an oral hearing, if held.

13. A Discipline Panel may take reasonable measures to support a minor's participation in a disciplinary process.

Reporting a Complaint

14. Any person may report a complaint to the Organization or a Member or to the Independent Third Party:
    ITP Sport: https://app.integritycounts.ca/org/itpsport

15. When a complaint is reported to the Organization or a Member, the Organization or Member will report the complaint to the Independent Third Party and will have no involvement in the matter unless required by the Discipline process.

16. At the discretion of the Organization or a Member (as applicable), the Organization or a Member may act as the Complainant and initiate the complaint process under the terms of this Policy. In such cases, the organization will identify an individual to represent the Organization or a Member.
17. Complaints or incident reports should be made in writing and the person making the complaint may contact the Independent Third Party for direction. The Independent Third Party may accept any report, in writing or not, at their sole discretion.

CCES Participants

18. Incidents that involve alleged Maltreatment or Prohibited Behaviour involving an CCES Participant must be reported to CCES and will be addressed pursuant to the CCES's policies and procedures.

19. CCES shall determine the admissibility of such complaints in accordance with the relevant and applicable CCES Guidelines regarding the initial review and preliminary assessment, at their

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sole discretion.

20. If the Independent Third Party receives a complaint that they consider would otherwise fall within the above sections, they shall refer the matter to the CCES and notify the Individual(s) that made the complaint of such action within seven days of referring the matter to the CCES.

Independent Third-Party Responsibilities

21. Upon receipt of a complaint from an Individual (or Individuals), the Independent Third Party shall determine whether the complaint should be handled by the Independent Third Party for Sport NL, or the Organization.

22. The Independent Third Party shall make this determination by taking into consideration whether the incident has occurred within the business, activities or events of the Organization of a Member, or if Clause 4 or 5 of this Policy may be applied

23. Notwithstanding the above, the Case Manager may direct a complaint to be managed by the Organization if the Member is otherwise unable to manage the complaint for valid and justifiable reasons, such as a conflict of interest or due to a lack of capacity.

24. The Independent Third Party may determine that the alleged incident may require investigation. In this case, the Independent Third Party may appoint an Investigator who will investigate the complaint.

25. Upon receipt of a complaint, the Independent Third Party has a responsibility to:
    a. Determine whether the complaint is frivolous and/or within the jurisdiction of this Policy;
    b. Determine the appropriate jurisdiction to manage the complaint:[3]
    c. Propose the use of alternate dispute resolution techniques;
    d. Determine that the alleged incident may require an investigation. The **Case Manager** may also appoint an Investigator to investigate the complaint; and/or
    e. Choose which process should be followed, and may use the following examples as a general guideline:

        i. Process #1 - the Complaint alleges the following incidents:
            1. Disrespectful conduct
            2. Minor incidents of violence (e.g., tripping, pushing, elbowing)
            3. Conduct contrary to the values of the Organization or a Member
            4. Non-compliance with the organization's policies, procedures, rules, or regulations
            5. Minor violations of the Code of Conduct and Ethics
            6. Pranks, jokes, or other activities that cause harm to others

[1] This excludes the decision making in Process#1 regarding if the Organization or Member will address the complaint

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7. Conduct that intentionally interferes with a competition or with any athlete's preparation for a competition
8. Consistent disregard for the bylaws, policies, rules, and regulations
9. Major or repeated violations of the Code of Conduct and Ethics
10. Any possession or use of banned performance enhancing drugs or methods that is not addressed by CCES or designated anti-doping agency.
11. Abusive use of alcohol, any use or possession of alcohol by minors, or use or possession of illicit drugs and narcotics
12. Intentionally damaging the organization's property or improperly handling the organization's monies.

ii. Process #2 - the Complaint alleges the following incidents:
1. Prohibited Behaviour as defined by the UCCMS
2. Any incident of hazing
3. Behaviour that constitutes harassment, sexual harassment, or sexual misconduct
4. Major incidents of violence (e.g., fighting, attacking, sucker punching)
5. A conviction for any Criminal Code offense as it relates to Maltreatment and/or Prohibited Behaviour

26. If an organization due to a conflict of interest, capacity concern or other valid and justifiable reason cannot address a Process #1 complaint, they may refer the matter to the Independent Third Party for Sport NL. The decision to accept or deny the referral is at the discretion of Sport NL.

27. If the Independent Third Party determines the complaint is frivolous or outside the jurisdiction of this Policy, the complaint will be dismissed immediately.

28. The Independent Third Party's decision to accept or dismiss the complaint may not be appealed.

Process #1: Handled by Complaint Resolution Officer

Complaint Resolution Officer

29. Following the determination that the complaint or incident should be handled under Process #1, the Organization shall determine whether the complaint should be handled by the Organization or by a Member Organization. [2]

[2] The Organization may appoint a Case Manager who will determine whether the complaint should be handled by the Organization or by a Member Organization and administer Process #1.

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30. The Organization or appointed Case Manager shall make this determination by taking into consideration whether the incident has occurred within the business, activities or events of the Organization of a Member.

31. Notwithstanding the above, the Organization may direct a complaint to be managed by the Organization if the Member is otherwise unable to manage the complaint for valid and justifiable reasons, such as a conflict of interest or due to a lack of capacity.

32. If the Organization determines that the complaint or incident should be handled by a Member, that Member shall appoint its own Complaint Resolution Officer to fulfil the responsibilities listed below. In such instance, any reference to Complaint Resolution Officer below shall be understood as a reference to the Member's Complaint Resolution Officer.

33. The Complaint Resolution Officer must be an independent individual, established solely for the purpose of adjudicating the infractions brought before it pursuant to this Policy. At the Organization's discretion, an external individual with the necessary expertise may be appointed to fulfill this role.

34. Once the complaint is accepted, the Complaint Resolution Officer will:
    a. Provide the complaint to the respondent.
    b. The Complaint Resolution Officer will take all possible steps to address the dispute through Alternative Dispute Resolution, including Mediation.
    c. If unsuccessful in resolving the matter through Alternative Dispute Resolution, the Complaint Resolution Officer will decide on the format under which the complaint will be heard. The format may be a documentary hearing (summary proceeding) or oral hearing.
    d. The decision on format of hearing by the Complaint Resolution Officer is not subject to appeal.
    e. Within 10 days of the Appointment of the Complaint Resolution Officer the Complainant will provide a brief to both the Complaint Resolution Officer and the Respondent. The written brief shall be a maximum of 5 pages setting out the Complainants position on the issues raised in the complaint.
    f. The documents the Complainant considers relevant or wishes to rely on will be a maximum of 10 documents and 200 pages.
        i. For clarity, a series of connected documents such as a series of emails or a series of letters may be considered one document.
    g. Within 15 business days of receipt of the Complainant's brief, the Respondent will provide to both the Complaint Resolution Officer and the Complainant a written brief. The written brief will be a maximum 5 pages in length which sets out the Respondent's position on the issues contained in the complaint.
    h. Any documentary evidence that the Respondent wishes to rely on will be a maximum 10 documents and 200 pages.

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i. For clarity, a series of connected documents such as a series of emails or a series of letters may be considered one document.

i. Both Parties shall also have the right to submit to the Complaint Resolution Officer any relevant evidence, including, but not limited to witness statements, documentary evidence or evidence from other media (i.e., photos, screenshots, videos, or other recordings)

j. Within 15 business days of receipt of the Respondent's response the Complainant may submit to both the Complaint Resolution Officer and the Respondent a reply statement. The maximum length of the reply statement is 5 pages.

k. No further documents may be submitted.

l. For cases requiring an oral hearing, the Complaint Resolution Officer will ask the Complainant and the Respondent for oral submissions in addition to written submissions regarding the complaint or incident.

m. In the case of oral submissions, each Party shall be present when such submissions are made (unless waived by a Party); and/or:

n. Following receipt of the Parties' submissions, the Complaint Resolution Officer may convene the Parties to a meeting, either in person or by way of video or teleconference to ask the Parties questions and to allow the Parties to ask questions of one another.

35. Following their review of the submissions and evidence related to the complaint, the Complaint Resolution Officer shall determine if any of the incidents alleged above have occurred and, if so, determine whether to impose a sanction and, if so, determine the appropriate sanction.

36. If, after hearing the Parties and reviewing their submissions, the Complaint Resolution Officer considers that none of the incidents alleged above have occurred, they shall dismiss the complaint.

37. The Complaint Resolution Officer will inform the Parties of the decision, which shall be in writing and include reasons.

38. The Complaint Resolution Officer decision will take effect immediately, unless specified otherwise by the Complaint Resolution Officer.

39. Should the circumstances require a decision to be rendered immediately or within a short timeline, the Complaint Resolution Officer may render a short decision, either orally or in writing, followed by a written reasoned decision.

40. Any decision rendered by the Complaint Resolution Officer shall be provided to and maintained in the records of the relevant affiliated organization, and Member Organization.

41. Records of all sanctions will be maintained by the Organization and the Member. Members will disclose all decisions to the Organization, which may disclose such decisions at its discretion.

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Process #2: Handled by Case Manager

Case Manager

42. Following the determination that the complaint or incident should be handled under Process #2, the Independent Third Party for Sport NL Case Manager has a responsibility to:
    a. Propose the use of alternate dispute resolution techniques
    b. Appoint the Discipline Panel, if necessary
    c. Coordinate all administrative aspects and set timelines
    d. Provide administrative assistance and logistical support to the Discipline Panel as required
    e. Provide any other service or support that may be necessary to ensure a fair and timely proceeding

43. The Case Manager will establish and adhere to timelines that ensure procedural fairness and that the matter is heard in a timely fashion.

44. The Case Manager may propose using alternate dispute resolution with the objective of resolving the dispute. If applicable, and if the dispute is not resolved, or if the parties refuse to attempt alternate dispute resolution (such as mediation or a negotiated settlement) the Case Manager will appoint a Discipline Panel, which shall consist of a single Arbitrator, to hear the complaint. At the discretion of the Case Manager, a Discipline Panel of three persons may be appointed to hear the complaint. In this event, the Case Manager will appoint one of the Discipline Panel's members to serve as the Chair.

45. The Case Manager, in cooperation with the Discipline Panel, will then decide the format under which the complaint will be heard. This decision may not be appealed. The format of the hearing may be an oral in-person hearing, an oral hearing by telephone or other communication medium, a hearing based on a review of documentary evidence submitted in advance of the hearing, or a combination of these methods. The hearing will be governed by the procedures that the Case Manager and the Discipline Panel deem appropriate in the circumstances, provided that:
    a. The Parties will be given appropriate notice of the day, time, and place of the hearing, in the case of an oral in-person hearing or an oral hearing by telephone or other communication medium
    b. Copies of any written documents which the parties wish to have the Discipline Panel consider will be provided to all Parties, through the Case Manager, in advance of the hearing
    c. The Parties may engage a representative, advisor, or legal counsel at their own expense
    d. The Discipline Panel may request that any other individual participate and give evidence at the hearing
    e. The Discipline Panel may allow as evidence at the hearing any oral evidence and document or thing relevant to the subject matter of the complaint, but may exclude such evidence that is unduly repetitious, and shall place such weight on the evidence as it deems appropriate
    f. The decision will be by a majority vote of the Discipline Panel

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46. If the Respondent acknowledges the facts of the incident, the Respondent may waive the hearing, in which case the Discipline Panel will determine the appropriate sanction. The Discipline Panel may still hold a hearing for the purpose of determining an appropriate sanction.

47. The hearing will proceed in any event, even if a Party chooses not to participate in the hearing.

48. In fulfilling its duties, the Discipline Panel may obtain independent advice.

Decision

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

Sanctions

50. The Discipline Panel may apply the following disciplinary sanctions, singularly or in combination:
    a. Verbal or written reprimand
    b. Verbal or written apology
    c. Service or other contribution to the Organization or a Member
    d. Removal of certain privileges
    e. Suspension from certain teams, events, and/or activities
    f. Suspension from certain activities for a designated period
    g. Payment of the cost of repairs for property damage
    h. Suspension of funding from the organization or from other sources
    i. Expulsion from the organization
    j. Any other sanction considered appropriate for the offense

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

52. Records of all decisions will be maintained by the Organization and the Member (as applicable). Members will submit all records to the Organization.

Appeals

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

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Suspension Pending a Hearing

54. The Organization or the Member (as applicable) may determine that an alleged incident is of such seriousness as to warrant suspension of an Individual pending completion of an investigation, criminal process, the hearing, or a decision of the Discipline Panel.

Criminal Convictions

55. The Organization or the Member (as applicable) may determine in its sole discretion that an Individual's conviction for a Criminal Code offense will be deemed an infraction under this Policy and will result in expulsion from the Organization or the Member (as applicable). Criminal Code offences may include, but are not limited to:
    a. Any child pornography offences
    b. Any sexual offences
    c. Any offence of physical violence
    d. Any offence of assault
    e. Any offence involving trafficking of illegal drugs

Confidentiality

56. The discipline and complaints process is confidential and involves only the Organization, the applicable Member(s), the parties, the Case Manager, the Discipline Chair, the Discipline Panel, and any independent advisors to the Discipline Panel. Once initiated and until a decision is released, none of the parties will disclose confidential information relating to the discipline or complaint to any person not involved in the proceedings.
57. Any failure to respect the aforementioned confidentiality requirement may result in further sanctions or discipline by the Discipline Chair or Discipline Panel (as applicable).

Timelines

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

Records and Distribution of Decisions

59. Other individuals or organizations, including, but not limited to, national sport organizations, provincial/territorial sport organizations, sport clubs, etc., may be advised of any decisions rendered in accordance with this Policy at the discretion of Sport NL.

Policy History	
Approved	April 28 2025
Next Review Date	
Revision Approval Dates	

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RECIPROCATION POLICY

Purpose

1. The purpose of this Policy is to ensure enforcement and recognition of all disciplinary sanctions applied by the Organization and its Members.

2. The Organization and its Members recognize the importance of safe sport for all participants.

Application

3. This Policy applies to the Organization and its Members.

Responsibilities

4. The Organization will:
    a) Provide copies of discipline and appeal decisions involving Individuals to all Members with which the Individual was affiliated
    b) For discipline decisions provided to the Organization by the National Organization, by another Provincial/Territorial Organization or by a Member, determine per the *Discipline and Complaints Policy* whether to initiate further action against the Individual(s) named in the decision
    c) Recognize and enforce the disciplinary sanctions imposed by the National Organization, by another Provincial/Territorial Organization or by a Member.

5. Members will:
    a) Provide copies of discipline and appeal decisions involving Individuals to the Organization
    b) For discipline decisions provided to a Member by the Organization, determine per its own policies whether to initiate further action against the Individual(s) named in the decision
    c) Recognize and enforce the disciplinary sanctions imposed by the National Organization, by the Organization, or by another Member
    d) Update their governing documents to reference the reciprocation procedures described herein

Policy History	
Approved	April 28 2025
Next Review Date	
Revision Approval Dates	

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INVESTIGATIONS POLICY

Purpose

1. The Organization and its Members are committed to eliminating all instances of Discrimination, Harassment, Workplace Harassment, Workplace Violence, Sexual Harassment, and Maltreatment within their operations and activities. This Policy describes how Individuals can report instances of Discrimination, Harassment, Workplace Harassment, Workplace Violence, Sexual Harassment, and Maltreatment and how the Organization will lead the investigation of those reports.

Determination and Disclosure

2. When a complaint is submitted pursuant to the *Discipline and Complaints Policy*, the Case Manager will determine if such complaint is related to an instance of Discrimination, Harassment, Workplace Harassment, Workplace Violence, Sexual Harassment, or Maltreatment, or any other matter requiring investigation.

3. The Organization and its Members will adhere to all disclosure and reporting responsibilities required by any government entity, local police force, or child protection agency.

Investigation

4. Complaints that are determined to contain an element of Discrimination, Harassment, Workplace Harassment, Workplace Violence, Sexual Harassment, and Maltreatment, or any other matter deemed relevant by the Case Manger will continue to be addressed by the process(es) described in the *Discipline and Complaints Policy*. However, the Case Manager may also appoint an Investigator to investigate the allegations.

5. The Investigator must be an independent third-party skilled in investigating. The Investigator must not be in a conflict-of-interest situation and should have no connection to either party.

6. Federal and/or Provincial legislation related to Workplace Harassment may apply to the investigation if Harassment was directed toward a worker in a Workplace. The Investigator should review workplace safety legislation, the organization's policies for human resources, and/or consult independent experts to determine whether legislation applies to the complaint.

7. The investigation may take any form as decided by the Investigator, guided by any applicable Federal and/or Provincial legislation. The investigation may include:
    a) Interviews with the Complainant
    b) Witness interviews
    c) Statement of facts (Complainant's perspective) prepared by Investigator, acknowledged by the Complainant and provided to the Respondent
    d) Interviews with the Respondent
    e) Statement of facts (Respondent's perspective) prepared by Investigator, acknowledged by the Respondent and provided to the Complainant

Investigator's Report

8. Upon completion of their investigation, the Investigator shall prepare a report that should include a summary of evidence from the parties (including both statements of facts, if applicable) and recommendations from the

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Investigator of whether, on a balance of probabilities, an incident occurred that could be considered Discrimination, Harassment, Workplace Harassment, Workplace Violence, Sexual Harassment, or Maltreatment, or breach of a governing document, including, but not limited to the *Code of Conduct and Ethics*.

9. The Investigator's report will be provided to the Case Manager who will disclose it, at their discretion, to the Organization or the Member (as applicable) and others.

10. Should the Investigator find that there are possible instances of offence under the *Criminal Code*, particularly related to Criminal Harassment (or Stalking), Uttering Threats, Assault, Sexual Interference, or Sexual Exploitation, the Investigator shall advise the Complainant and the Organization or the Member (as applicable) to refer the matter to police.

11. The Investigator must also inform the Organization or the Member (as applicable) of any findings of criminal activity. The Organization or the Member (as applicable) may decide whether to report such findings to police but is required to inform police if there are findings related to the trafficking of prohibited substances or methods (as indicated in the version of the World Anti-Doping Agency's Prohibited List currently in force), any sexual crime involving Minors, fraud against the Organization or any Member(s) (as applicable), or other offences where the lack of reporting would bring the Organization or the Member (as applicable) into disrepute.

Reprisal and Retaliation

12. An Individual who submits a complaint to the Organization or to a Member or who gives evidence in an investigation may not be subject to reprisal or retaliation from any individual or group. Any such conduct may constitute Maltreatment and will be subject to disciplinary proceedings pursuant to the *Discipline and Complaints Policy*.

False Allegations

13. An Individual who submits allegations that the Investigator determines to be malicious, false or for the purpose of retribution, retaliation or vengeance (or that otherwise fall within the definition of Maltreatment) may be subject to a complaint under the terms of the *Discipline and Complaints Policy* and may be required to pay for the costs of any investigation that comes to this conclusion. Any Individual who is liable to pay for such costs shall be automatically deemed to be not in good standing until the costs are paid in full. The Organization or any Member(s) (as applicable), or the Individual against whom the allegations were submitted, may act as the Complainant.

Confidentiality

14. The Investigator will make every effort to preserve the confidentiality of the complainant, respondent, and any other party. However, the Organization and its Members recognize that maintaining anonymity of any party may be difficult for the Investigator during the investigation.

Policy History	
Approved	April 28 2025
Next Review Date	
Revision Approval Dates	

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DISPUTE RESOLUTION POLICY

Purpose

1. The Organization and its Members support the principles of Alternate Dispute Resolution (ADR) and are committed to the techniques of negotiation, facilitation, and mediation as effective ways to resolve disputes. ADR also avoids the uncertainty, costs, and other negative effects associated with lengthy appeals or complaints, or with litigation.

2. The Organization and its Members encourage all Individuals to communicate openly, and to collaborate and use problem-solving and negotiation techniques to resolve their differences. The Organization and its Members believe that negotiated settlements are most often preferable to arbitrated outcomes. Negotiated resolutions to disputes with and among Individuals are strongly encouraged.

Application of this Policy

3. This Policy applies to all Individuals.

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

Facilitation and Mediation

5. If all parties to a dispute agree to ADR, a mediator or facilitator, acceptable to all parties, shall be appointed to mediate or facilitate the dispute.

6. The mediator or facilitator shall decide the format under which the dispute shall be mediated or facilitated and may, if they consider it appropriate, specify a deadline before which the parties must reach a negotiated decision.

7. Should a negotiated settlement be reached, the settlement shall be reported to the Organization or the Member (as applicable). Any actions that are to take place as a result of the decision shall be enacted on the timelines specified by the negotiated decision, pending approval of the Organization or the Member (as applicable).

8. Should a negotiated settlement not be reached by the deadline specified by the mediator or facilitator at the start of the process (if set), or if the parties to the dispute do not agree to ADR, the dispute shall be considered under the appropriate section of the *Discipline and Complaints Policy* or *Appeal Policy,* as applicable.

Final and Binding

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

Policy History	
Approved	April 28 2025
Next Review Date	
Revision Approval Dates	

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GOLF NEWFOUNDLAND LABRADOR [THE ORGANIZATION]

APPEAL POLICY

Purpose

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

Scope and Application of this Policy

2. This Policy applies to all Individuals.

3. Any Individual who is directly affected by a decision made by the Organization or a Member shall have the right to appeal that decision provided that there are sufficient grounds for the appeal under the **Grounds for Appeal** section of this Policy.

4. This Policy **will apply** to decisions relating to:
    a. Eligibility
    b. Selection
    c. Conflict of Interest
    d. Discipline[4]
    e. Membership

5. This Policy **will not apply** to decisions relating to:
    a. Employment
    b. Infractions for doping offenses
    c. The rules of the sport
    d. Selection criteria, quotas, policies, and procedures established by entities other than the Organization or a Member (as applicable)
    e. Substance, content and establishment of team selection or carding criteria
    f. Volunteer/coach appointments and the withdrawal or termination of those appointments
    g. Budgeting and budget implementation
    h. The organization's operational structure and committee appointments
    i. Decisions or discipline arising within the business, activities, or events organized by entities other than the Organization or its Members (appeals of these decisions shall be dealt with pursuant to the policies of those other entities unless requested and accepted by the organization at its sole discretion).
    j. Commercial matters for which another appeals process exists under a contract or applicable law
    k. Decisions made under this Policy

[4] Discipline matters heard by SportNL on behalf of the Organization or Member will have the Appeal processed by the Independent Third Party. The Independent Third Party will assume the role of Appeal Manager as outlined in this Appeals Policy.

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Timing of Appeal

6. Individuals who wish to appeal a decision shall have seven (7) days from the date on which they received notice of the decision to submit the following:
    a. Notice of the intention to appeal
    b. Their contact information
    c. Name and contact information of the Respondent and any Affected Parties, when known to the Appellant
    d. Date the Appellant was advised of the decision being appealed
    e. A copy of the decision being appealed, or description of decision if written document is not available
    f. Grounds for the appeal
    g. Detailed reasons for the appeal
    h. All evidence that supports these grounds
    i. Requested remedy or remedies
    j. An administration fee of two hundred dollars ($200), which will be refunded if the appeal is upheld.

7. An Individual who wishes to initiate an appeal beyond the seven (7) day period must provide a written request stating the reasons for an exemption. The decision to allow or not allow an appeal outside of the seven (7) day period will be at the sole discretion of the Appeal Manager and may not be appealed.

Grounds for Appeal

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

Submitting an Appeal

9. Appeals of decisions made by the Member can be submitted to the Member to be heard pursuant to this Policy. Appeals of Discipline Decisions made by Sport NL will be submitted to the Independent Third Party for review in accordance with this procedure.

Screening of Appeal

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

11. Appeals resolved under the *Dispute Resolution Policy* will result in the administration fee being refunded to the Appellant.

12. Should the appeal not be resolved by using the *Dispute Resolution Policy*, the Organization or the Member (as applicable) will appoint an independent Appeal Manager (who must not be in a conflict of interest or have any direct relationship with the parties) who has the following responsibilities:
    a. To determine if the appeal falls under the scope of this Policy
    b. To determine if the appeal was submitted in a timely manner

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c. To decide whether there are sufficient grounds for the appeal

13. If the Appeal Manager denies the appeal on the basis of insufficient grounds, because it was not submitted in a timely manner, or because it did not fall under the scope of this Policy, the Appellant will be notified, in writing, of the reasons for this decision. This decision may not be appealed.

14. If the Appeal Manager is satisfied there are sufficient grounds for an appeal, the Appeal Manager will appoint an Appeal Panel which shall consist of a single Arbitrator, to hear the appeal. In extraordinary circumstances, and at the discretion of the Appeal Manager, an Appeal Panel composed of three persons may be appointed to hear the appeal. In this event, the Appeal Manager will appoint one of the Panel's members to serve as the Chair.

Determination of Affected Parties

15. To confirm the identification of any Affected Parties, the Appeal Manager will engage the Organization or the Member (as applicable). The Appeal Manager may determine whether a party is an Affected Party in their sole discretion.

Procedure for Appeal Hearing

16. The Appeal Manager shall notify the Parties that the appeal will be heard. The Appeal Manager shall then decide the format under which the appeal will be heard. This decision is at the sole discretion of the Appeal Manager and may not be appealed.

17. If a party chooses not to participate in the hearing, the hearing will proceed in any event.

18. The format of the hearing may involve an oral in-person hearing, an oral hearing by telephone or other electronic means, a hearing based on a review of documentary evidence submitted in advance of the hearing, or a combination of these methods. The hearing will be governed by the procedures that the Appeal Manager and the Panel deem appropriate in the circumstances, provided that:
    a. The hearing will be held within a timeline determined by the Appeal Manager
    b. The Parties will be given reasonable notice of the day, time and place of an oral in-person hearing or oral hearing by telephone or electronic communications.
    c. Copies of any written documents which the parties wish to have the Panel consider will be provided to all Parties in advance of the hearing
    d. The Parties may be accompanied by a representative, advisor, or legal counsel at their own expense
    e. The Panel may request that any other individual participate and give evidence at an oral in-person hearing or oral hearing by telephone or electronic communications.
    f. The Panel may allow as evidence at the hearing any oral evidence and document relevant to the subject matter of the appeal but may exclude such evidence that is unduly repetitious and shall place such weight on the evidence as it deems appropriate.
    g. If a decision in the appeal may affect another party to the extent that the other party would have recourse to an appeal in their own right under this Policy, that party will become an Affected Party to the appeal in question and will be bound by its outcome
    h. The decision to uphold or reject the appeal will be by a majority vote of Panel members when there is a Panel of three.

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19. In fulfilling its duties, the Panel may obtain independent advice.

Appeal Decision

20. The Appellant must demonstrate, on a balance of probabilities, that the Respondent has made a procedural error as described in the **Grounds for Appeal** section of this Policy and that this error had, or may reasonably have had, a material effect on the decision or decision-maker.

21. The Panel shall issue its decision, in writing and with reasons, within seven (7) days after the hearing's conclusion. In making its decision, the Panel will have no greater authority than that of the original decision-maker. The Panel may decide to:
    a. Reject the appeal and confirm the decision being appealed;
    b. Uphold the appeal and refer the matter back to the initial decision-maker for a new decision; or
    c. Uphold the appeal and vary the decision.

22. The Panel will also determine whether costs of the appeal, excluding legal fees and legal disbursements of any parties, will be assessed against any party. In assessing costs, the Panel will take into account the outcome of the appeal, the conduct of the parties, and the parties' respective financial resources

23. The Panel's written decision, with reasons, will be distributed to all parties, the Appeal Manager, and the Organization or the Member (as applicable). In extraordinary circumstances, the Panel may first issue a verbal or summary decision soon after the hearing's conclusion, with the full written decision to be issued thereafter. The decision will be considered a matter of public record unless decided otherwise by the Panel.

Timelines

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

Confidentiality

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

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

Final and Binding

27. No action or legal proceeding will be commenced against the Organization, Members, or Individuals in respect to a dispute, unless the Organization or the Member (as applicable) has refused or failed to provide or abide by the dispute resolution process and/or appeal process as set out in governing documents.

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Approved	April 28 2025
Next Review Date	
Revision Approval Dates	

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EVENT DISCIPLINE POLICY

** This *Event Discipline Policy* does not supersede or replace the *Discipline and Complaints Policy* **

Purpose

1. The Organization and its Members are committed to providing a competition environment in which all Individuals are treated with respect. This Procedure outlines how alleged misconduct during an Event will be handled.

Scope and Application of this Policy

2. This Procedure will be applied to all Events sanctioned by the Organization or a Member (as applicable).

3. If the Event is being sanctioned by an organization other than the Organization or a Member (e.g., an international federation), the procedures for event discipline of the host organization will replace this procedure. Incidents involving Individuals connected with the Organization or a Member (such as Athletes, coaches, and Directors and Officers) must still be reported to the Organization or the Member (as applicable) to be addressed under the *Discipline and Complaints Policy,* if necessary.

4. This Procedure does not replace or supersede the *Discipline and Complaints Policy*. Instead, this Procedure works in concert with the *Discipline and Complaints Policy* by outlining, for a designated person with authority at an event sanctioned by the Organization or a Member, the procedure for taking immediate, informal, or corrective action in the event of a possible violation of the *Code of Conduct and Ethics*.

Misconduct During Events

5. Incidents that violate or potentially violate the *Code of Conduct and Ethics,* which can occur during a competition, away from the area of competition, or between parties connected to the Event, shall be reported to a designated person (usually the chief official) responsible at the Event.

6. The designated person at the Event shall use the following procedure to address the incident that violated or potentially violated the *Code of Conduct and Ethics*:
    a) Notify the involved parties that there has been an incident that violated or potentially violated the *Code of Conduct and Ethics*
    b) Convene a jury of either one person or three people (one of whom shall be designated the Chairperson), who shall not be in a conflict of interest or involved in the original incident, to determine whether the *Code of Conduct and Ethics* has been violated. The designated person at the Event may serve on the jury
    c) The jury will interview and secure statements from any witnesses to the alleged violation
    d) If the violation occurred during a competition, interviews will be held with the officials who officiated or observed the competition and with the coaches and captains of each team when necessary and appropriate
    e) The jury will secure a statement from the person(s) accused of the violation
    f) The jury will render a decision and determine a penalty
    g) The Chairperson of the jury will inform all parties of the jury's decision

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7. The penalty determined by the jury may include any of the following, singularly or in combination:
    a) Oral or written warning
    b) Oral or written reprimand
    c) Suspension from future competitions at the Event
    d) Ejection from the Event
    e) Other appropriate penalty as determined by the jury

8. The jury does not have the authority to determine a penalty that exceeds the duration of the Event. A full written report of the incident and the jury's decision shall be submitted to the Organization or the Member (as applicable) following the conclusion of the Event. Further discipline may then be applied in accordance with the *Discipline and Complaints Policy*, if necessary.

9. Decisions made pursuant to this Policy may not be appealed.

10. This Policy does not prohibit other Individuals from reporting the same incident to the Organization or a Member to be addressed as a formal complaint under the *Discipline and Complaints Policy*.

11. The Organization and its Members shall record and maintain records of all reported incidents.

Timeliness

12. The procedures outlined in this Policy are Event-specific and therefore shall be exercised and implemented as soon as it is reasonable to do so. The final decision of the jury must be reached and communicated to the Parties prior to the conclusion of the event in order for it to be effective.

13. Decisions issued by the jury after the conclusion of the event will not be enforceable.

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Approved	April 28 2025
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WHISTLEBLOWER POLICY

Purpose

1. The purpose of this Policy is to allow Workers to have a discrete and safe procedure by which they can disclose incidents of wrongdoing without fear of unfair treatment or reprisal.

Application

2. This Policy only applies to Workers who observe or experience incidents of wrongdoing committed by Directors or by other Workers.

3. Incidents of wrongdoing or misconduct observed or experienced by participants, volunteers, spectators, parents of participants, or other individuals can be reported under the terms of the *Discipline and Complaints Policy*.

Wrongdoing

4. Wrongdoing can be defined as:
    a) Violating the law;
    b) Intentionally or seriously breaching of the *Code of Conduct and Ethics*;
    c) Intentionally or seriously breaching policies for workplace violence and harassment;
    d) Committing or ignoring risks to the life, health, or safety of a participant, volunteer, or other individual;
    e) Directing an individual to commit a crime, serious breach of a policy of the Organization or a Member, or other wrongful act; or
    f) Fraud.

Pledge

5. The Organization and its Members pledge not to dismiss, penalize, discipline, or retaliate or discriminate against any Worker who discloses information or submits, in good faith, a report against a Worker or Director under the terms of this Policy.

6. Any individual affiliated with the Organization or its Members who breaks this Pledge will be subject to disciplinary action.

Reporting Wrongdoing

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

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Authority

8. The following Compliance Officer has been appointed to receive reports made under this Policy:

[insert contact information for Compliance Officer]

9. After receiving the report, the Compliance Officer has the responsibility to:
    a) Assure the individual of the **Pledge**
    b) Connect the individual to the Alternate Liaison if the individual feels that he or she cannot act in an unbiased or discrete manner due to the individual's role with the Organization or its Members and/or the content of the report
    c) Determine if the report is frivolous, vexatious, or not submitted in good faith (e.g., the submission of the report is motivated by personal interests and/or the content of the report is obviously false or malicious)
    d) Determine if the *Whistleblower Policy* applies or if the matter should be handled under the *Discipline and Complaints Policy*
    e) Determine if the local police service be contacted
    f) Determine if mediation or alternate dispute resolution can be used to resolve the issue
    g) Determine if the organization's Chair and/or senior staff person should or can be notified of the report
    h) Begin an investigation

Alternate Liaison

10. If the Worker feels that the Compliance Officer is unable to act in an unbiased or discrete manner due to the individual's role with the organization and/or the content of the report, the Worker should contact the following individual who will act as an independent liaison between the Worker and the Compliance Officer:

[insert contact information for Alternate Liaison]

11. The Alternate Liaison will not disclose the Worker's identity to the Compliance Officer or to anyone affiliated with the organization without the Worker's consent.

12. A Worker who is unsure if he or she should submit a report, or who does not want to have his or her identity known, may contact the Alternate Liaison for informal advice about the process.

Investigation

13. If the Compliance Officer determines that an investigation should be launched, the Compliance Officer may decide to contract an external investigator. In such cases, the Organization or a Member (as applicable) may be notified that an investigation conducted by an external investigator is necessary without the nature of the investigation, content of the report, or identity of the Worker who submitted the report being disclosed. The Organization or a Member (as applicable) may not unreasonably refuse the decision to contract an external investigator

14. An investigation launched by the Compliance Officer or by an external investigator should generally take the following form:
    a) Follow-up interview with the Worker who submitted the report

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b) Identification of Workers, participants, volunteers or other individuals that may have been affected by the wrongdoing
c) Interviews with such-affected individuals
d) Interview with the Director(s) or Worker against whom the report was submitted
e) Interview with the supervisor(s) of the Worker against whom the report was submitted, if applicable

15. The investigator will prepare an Investigator's Report – omitting names whenever possible and striving to ensure confidentiality – that will be submitted to the Organization or a Member (as applicable) for review and action.

Decision

16. Within fourteen (14) days after receiving the Investigator's Report, the organization will take corrective action, as required. Corrective action may include, but is not limited to including:
    a) Enacting and/or enforcing policies and procedures aimed at eliminating the wrongdoing or further opportunities for wrongdoing;
    b) Revision of job descriptions; or
    c) Discipline, suspension, termination, or other action as permitted by the Bylaws of the Organization or a Member (as applicable), provincial employment legislation, *Human Resources Policy,* and/or the Worker's Employment Agreement or Contractor Agreement.

17. The corrective action, if any, will be communicated to the investigator who will then inform the Worker who submitted the report.

18. Decisions made under the terms of this Policy may be appealed under the terms of the *Appeal Policy* provided that:
    a) If the Worker who submitted the initial report is appealing the decision, the Worker who submitted understands that his or her identity must be revealed if he or she submits an appeal, and
    b) If the Director or Worker against whom the initial report was submitted is appealing the decision, the Director or Worker appealing understands that the identity of the person who submitted the report will not be revealed and that the Organization or a Member (as applicable) will act as the Respondent

Confidentiality

19. Confidentiality at all stages of the procedures outlined in this Policy – from the initial report to the final decision – is assured for all individuals. An individual who intentionally breaches the confidentiality clause of this Policy will be subject to disciplinary action.

20. In all stages of the investigation, the investigator will take every precaution to protect the identity of the person who submitted the report and/or the specific nature of the report itself. However, the Organization and its Member recognize that there are some instances where the nature of the report and/or the identity of the person who submitted the report will or may be inadvertently deduced by individuals participating in the investigation.

Policy History	
Approved	April 28 2025
Next Review Date	

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SOCIAL MEDIA POLICY

Preamble

1. The Organization and its Members are aware that Individual interaction and communication occurs frequently on social media. The Organization and its Members caution Individuals that any conduct falling short of the standard of behaviour required by this *Social Media Policy* and the *Code of Conduct and Ethics* may be subject to the disciplinary sanctions identified within the *Discipline and Complaints Policy*.

Application of this Policy

2. This Policy applies to all Individuals.

Conduct and Behaviour

3. The following social media conduct may be subject to disciplinary action in accordance with the *Discipline and Complaints Policy*:
   a) Posting a disrespectful, hateful, harmful, disparaging, insulting, or otherwise negative comment on a social medium that is directed at an Individual, at the Organization, at a Member, or at other individuals connected with the Organization or a Member
   b) Posting a picture, altered picture, or video on a social medium that is harmful, disrespectful, insulting, or otherwise offensive, and that is directed at an Individual, at the Organization, at a Member, or at other individuals connected with the Organization or a Member
   c) Creating or contributing to a Facebook group, webpage, Instagram account, Twitter feed, blog, or online forum devoted solely or in part to promoting negative or disparaging remarks or commentary about the Organization or a Member, their stakeholders, or their reputation
   d) Inappropriate personal or sexual relationships over a social medium between Individuals who have a power imbalance in their interactions, such as between Athletes and coaches, Directors and Officers, Committee members and staff, officials and Athletes, etc.
   e) Any instance of cyber-bullying or cyber-harassment between one Individual and another Individual, where incidents of cyber-bullying and cyber-harassment can include, but are not limited to, the following conduct on any social medium, via text message, or via email: insults, negative comments, vexatious or unwelcome behaviour, pranks or jokes, threats, posing as another person, spreading rumours or lies, or other harmful behaviour.

4. All conduct and behaviour occurring on social media may be the subject of a complaint pursuant to the *Discipline and Complaints Policy*.

Individuals' Responsibilities

5. Individuals acknowledge that their social media activity may be viewed by anyone, including the Organization, Members or other Individuals.

6. If the Organization or a Member unofficially engages with an Individual in social media (such as by retweeting a tweet or sharing a photo on Facebook) the Individual may, at any time, ask the Organization or the Member to cease this engagement.

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7. When using social media, an Individual must model appropriate behaviour befitting the Individual's role and status in connection with the Organization or a Member.

8. Removing content from social media after it has been posted (either publicly or privately) does not excuse the Individual from being subject to the *Discipline and Complaints Policy*.

9. An Individual who believes that another Individual's social media activity is inappropriate or may violate the policies and procedures of the Organization or a Member should report the matter in the manner outlined by the *Discipline and Complaints Policy*.

Policy History	
Approved	April 28 2025
Next Review Date	
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RISK MANAGEMENT POLICY

Preamble

1. The Organization and its Members are committed to managing risks by ensuring its decisions and actions reflect established standards and organizational values.

Purpose

2. The purpose of this Policy is to provide a guiding statement on how risks will be managed within the Organization and its Members. In general, the Organization and its Members view risk management as a comprehensive approach to improving organizational performance.

3. This Policy has other purposes, namely:
    a) Reinforcing an understanding of risk management as having a broad focus, beyond merely preventing lawsuits and financial losses
    b) Performing an educational function for staff and the Board
    c) Over the longer term, contributing to enhancing a 'risk management culture' within the Organization and its Members

4. Ultimately, successful risk management has the following benefits:
    a) Prevents or limits injury or losses to participants, volunteers and staff
    b) Helps to protects the Organization and its Members against unnecessary litigation
    c) Ensures that the Organization and its Members are compliant with all applicable laws, regulations and standards
    d) Improves the quality and relevance of the programs and services that the Organization and its Members provide to its members, partners and sponsors
    e) Promotes improved business management and human resource management practices
    f) Enhances the brand, reputation and image in the community of the Organization or a Member
    g) Overall, enhances the ability for the Organization or a Member to achieve their strategic objectives

Principles

5. The International Standard Organization (ISO 31000:2009E) risk management principles are:
    a) Risk management creates and protects value
    b) Risk management is an integral part of all organizational processes
    c) Risk management is part of decision making
    d) Risk management explicitly addresses uncertainty
    e) Risk management is systematic, structured and timely
    f) Risk management is based on the best available information
    g) Risk management is tailored
    h) Risk management considers human and cultural factors
    i) Risk management is transparent and inclusive
    j) Risk management is dynamic, iterative and responsive to change
    k) Risk management facilitates continual improvement of the organization

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Scope and Authority – Risk Manager

6. The Chair of the Risk Management Committee is the designated Risk Manager and is responsible for the implementation, maintenance, and communication of this policy. This policy applies to all decision and activities undertaken on behalf of the Organization or a Member.

Policy

7. The Organization and its Members make the following commitments:
    a) Activities and events undertaken by the Organization and its Members will incorporate the principles of risk management
    b) Systematic and explicit steps will be taken to identify, assess, manage and communicate risks facing the Organization and its Members in a timely fashion
    c) Risk mitigation strategies will be reasonable and will reflect the reasonable standard of care in any circumstance (where standard of care is determined by written/published standards, industry practices, established case law precedent, and common sense)

8. The Organization and its Members acknowledge that risk management is a broad activity and a shared responsibility. All Directors, Officers, staff, and volunteers have an ongoing responsibility to take appropriate measures within their scope of authority and responsibility to identify, assess, manage and communicate risks to those that they report to including but not limited to, the Risk Manager.

Risk Tolerance

9. The 'significance of a risk' refers to the combined ranking of the possibility/likelihood of a risk occurring and the consequence should it occur.

10. Possibility (P)
    a) Unlikely – less likely to happen than not; occurs every 5 years
    b) Possible – just as likely to happen as not; occurs once every year
    c) Probably – more likely to happen than not; occurs once a month
    d) Almost certain – sure to happen; occurs once a week

11. Consequence (C)
    a) Minor – will have an impact on the achievement of the objective that can be dealt with through small internal adjustments
    b) Moderate – will have an impact on some aspect of the achievement of the objective that will require changes to strategy or program delivery that may require a delay or increase in cost
    c) Serious – will significantly impact the achievement of the objective and require additional time, resources, costs, and thought
    d) Catastrophic – will have a debilitating impact on the achievement of the objective; staff and board need to devote full time resources to managing the situation

Commitment

12. Risks are identified by Directors and staff on an ongoing basis. All Minor-to-Moderate risks are managed by the Risk Manager and captured within programming documents.

13. Risks that arise and considered to be Serious - Catastrophic are treated as follows:

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a) If a **Serious** risk is identified, it must be communicated to the Chair of the Board or senior staff person within 48 of the risk being identified. The individual will take all reasonable measures to manage the risk including, but not limited to, seeking advice from other Board members, consulting external experts, etc. Once the individual feels that the risk has been managed or is in the process of being resolved, the Board will be advised using the most appropriate communications, which depending on the nature of the risk, may include an issue document, sharing at the next meeting, or calling a separate Board meeting to keep the Board informed.

b) If a **Catastrophic** risk has been identified, the Chair of the Board and senior staff person must be contacted immediately. The Chair of the Board and senior staff will determine the most appropriate action and if appropriate, may organize a Board meeting within 48 of the risk arising. It is understood that factors may arise that prevent this from happening including time zone, availability, nature of the risk, etc. All reasonable efforts will be made to manage the risk as it occurs, taking the necessary measures including, not to limited to, seeking the advice from internal partners, other Board members and external experts.

Procedures

14. Managing risks involves three steps:
    a) Identifying potential risks using an informed, environmental scan approach
    b) Assessing the significance of a risk by considering its likelihood and consequences
    c) Developing and implementing measures to address those risks deemed significant by reducing likelihood, consequences or both

15. Risks arise from a number of categories of the operations of the Organization and its Members. The following categories will be used when identifying risks:

    a) **Operational / Program Risks**

    Risks related to the development, sanctioning, and implementation of programs; management of human resources, including staff and volunteers; organizational capacity to meet member and stakeholder expectations.

    Technology and intellectual property risks related to the purchase, leasing, use, and storage of all hardware and software, programs, data, records, information including the protection of all intellectual property assets.

    b) **Compliance Risks**

    Risks related to failure to comply with existing laws and regulations governing employment, privacy, and workplace safety. Also includes complying with anti-doping policies, Sport Canada, other agency standards for funding and accountability, and the fulfillment of contractual obligations.

    c) **Communication Risks**

    Risks related to internal and external communications, information management systems, crisis and issues management, media relations, image and reputation management, missed opportunities to

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promote and exploit successful outcomes, management of intellectual property, social media opportunities and pitfalls, confidentiality.

d) **External Risks**

Risks that are not in direct control of the organization such as funding frameworks from government and other agencies; relations with governments, games organizations and international federations; security threats/risks, involvement in other sport partnerships; hosting decisions and requirements; changing political priorities.

e) **Governance Risks**

Risks related to clarity of roles and responsibilities, decision-making and oversight, organizational structure and performance; management of disputes and conflict of interest, planning for diversity and succession of the Board and committees, retention of corporate knowledge, staying current with trends affecting the Organization and its Members.

f) **Financial Risks**

Risks related to financial monitoring and reporting, flexibility to control and direct funds, sponsorship attraction and retention, currency exchange rates, investment and management of reserve funds, protection of revenue streams, long-term financial sustainability.

g) **Health and Safety of Athletes**

Risks related to the safety of athletes, abuse and/or harassment of athletes, practice or competition environment, equipment, and progressive training of athletes.

16. All risks faced by the Organization and its Members can be addressed by one or more of the following four general strategies:
    a) ***Retain*** the risk – no action is taken because the possibility and consequence of the risk is low. It may also be that the risk is inherent in the activity itself and thus can be accepted in its present form.
    b) ***Reduce*** the risk – steps are taken to reduce the possibility of the risk, and/or its potential consequences, through efforts such as improved planning, policies, delivery, supervision, monitoring, or education.
    c) ***Transfer*** the risk – accept the level of risk but transfer some or all of it to others through the use of insurance, waiver of liability agreements or other business contracts.
    d) ***Avoid*** the risk – eliminate the risk by avoiding the activity giving rise to the risk – in other words, simply decide NOT to do something, or to eliminate some activity or initiative.

17. The above general strategies translate into a variety of risk control measures, which for the Organization and its Members may include, but are not limited to:
    a) Development of policies, procedures, standards and rules
    b) Effective communication
    c) Education, instruction, professional development and specialized training
    d) Ensuring a core set of organizational values have been identified, defined and communicated throughout the organization

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e) Adherence to minimum, mandatory qualifications and/or certifications for key staff and leaders
f) Use of robust and legally sound contracts (i.e., employment agreements, contractor agreements, partnership agreements)
g) Improving role clarity through use of written position descriptions and committee terms of reference
h) Supervision and monitoring of staff, volunteers, participants and activities
i) Establishing and communicating procedures to handle concerns, complaints and disputes
j) Implementing schedules for regular review, maintenance, repair and replacement of equipment
k) Preparing procedures and protocols for emergency response and crisis management
l) Use of warnings, signage, participation agreements and waiver of liability agreements where warranted
m) Purchasing appropriate insurance coverage for all activities and reviewing regularly

Reporting and Communication

18. To ensure that risk management remains a high priority within the Organization and its Members and to promote an organizational culture that embraces a risk management perspective, risk management will be a standing item on the agenda of every regular Board meeting, so that staff (if applicable) and Directors can provide updates as required.

19. The Organization and its Members recognize that communication is an essential part of risk management. This policy will be communicated to staff, the Board of Directors, Committees and volunteers and the Organization and its Members will encourage all members to communicate their risk management issues and concerns.

Insurance

20. The Organization and its Members maintain a comprehensive insurance program that provides General Liability, Accident and Directors and Officers Errors and Omissions coverage to the directors, officers, staff, members, volunteers and sponsors of the Organization and its Members. On every review of this policy, the Organization and its Members will consult with the insurance provider to determine if there are any emerging gaps, issues, or deficiencies to be addressed through insurance renewal. Not all risks are insurable. However, as part of its commitment to risk management, the Organization and its Members will take all reasonable steps to ensure that insurance coverage is available for essential activities.

Policy History	
Approved	April 28 2025
Next Review Date	
Revision Approval Dates	

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SCREENING POLICY

Preamble

1. The Organization and its Members understand that screening personnel and volunteers is a vital part of providing a safe sporting environment and has become a common practice among sport organizations that provide programs and services to the sport community.

Application of this Policy

2. This Policy applies to all individuals whose position with the Organization, or a Member is one of trust or authority which may relate to, at a minimum, finances, supervision, or Vulnerable Individuals.

3. Not all individuals associated with the Organization, or a Member will be required to obtain a Criminal Record Check or submit screening documents because not all positions pose a risk of harm to the Organization, Members, or participants. The Organization or the Member will determine which individuals will be subject to screening using the following guidelines (the Organization or the Member may vary the guidelines at their discretion):

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

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

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

   a) Athlete support personnel
   b) Non-coach employees or managers
   c) Directors
   d) Coaches who are typically under the supervision of another coach
   e) Officials

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

   a) Full-time coaches
   b) Coaches who travel with Athletes
   c) Coaches who could be alone with Athletes

Screening Committee

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

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5. The Screening Committee is responsible for reviewing all documents submitted and based on the review, making decisions regarding the appropriateness of individuals filling positions within the Organization or the Member, as applicable. In carrying out its duties, the Screening Committee may consult with independent experts including lawyers, police, risk management consultants, volunteer screening specialists, or any other person.

6. Nothing in this Policy restricts or limits the Screening Committee from requesting that the individual attend an interview with the Screening Committee if the Screening Committee considers that an interview is appropriate and necessary to screen the individual's application.

7. Nothing in this Policy restricts or limits the Screening Committee from requesting the individual's authorization to contact any professional, sporting or other organization in order to assess the individual's suitability for the position that they are seeking.

8. Nothing in this Policy restricts or limits the Screening Committee from requesting further information from the individual on more than one occasion, subject to the individual's right to insist that the Screening Committee make a decision on the basis of the information before it.

9. The Screening Committee may, where appropriate, draw an adverse inference from an individual's failure to provide information or answer queries.

10. When assessing an individual's screening application, the Screening Committee shall determine whether there is reason to believe that the individual may pose a risk to the Organization, to a Member, or to another individual.

11. An individual having been previously penalized for a prior offence shall not prevent the Screening Committee from considering that offence as part of the individual's screening application.

12. If the Screening Committee determines based on the individual's screening application, in addition to any further material received by it, that the individual does not pose a risk to the members of the Organization, the Screening Committee shall approve the individual's application, subject to the Screening Committee's right to impose conditions.

13. In the case of a decision denying an application or approving an application with conditions, a copy of the decision shall be provided to the applicant and to the Board of Directors of the Organization or the Member, which may disseminate the decision as they see fit.

14. An Individual whose screening application has been denied or revoked may not re-apply to participate in the programs or activities of the Organization or the Member (as applicable) for two (2) years from the date the rejected application was made.

Screening Requirements

15. A Screening Requirements Matrix is provided as **Appendix A**.

16. It is the policy of the Organization and its Members that when an individual is first engaged by the

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organization:

a) Level 1 individuals will:
   i. Complete an Application Form (**Appendix B**)
   ii. Complete a Screening Disclosure Form (**Appendix C**)
   iii. Participate in training, orientation, and monitoring as determined by the organization

b) Level 2 individuals will:
   i. Complete an Application Form
   ii. Complete a Screening Disclosure Form
   iii. Complete and provide an Enhanced Police Information Check (E-PIC)
   iv. Provide one letter of reference related to the position
   v. Participate in training, orientation, and monitoring as determined by the organization
   vi. Provide a driver's abstract, if requested

c) Level 3 individuals will:
   i. Complete an Application Form
   ii. Complete a Screening Disclosure Form
   iii. Complete and provide an E-PIC and a Vulnerable Sector Check (VSC)
   iv. Provide one letter of reference related to the position and another from an applicable sport organization
   v. Participate in training, orientation, and monitoring as determined by the organization
   vi. Provide a driver's abstract, if requested

d) If an individual subsequently receives a charge, conviction for, or is found guilty of, an offense they will report this circumstance immediately to the Organization or the Member (as applicable). Additionally, the individual will inform the organization of any changes in their circumstance that would alter their original responses in their Screening Disclosure Form.

e) If the Organization or a Member learns that an individual has provided false, inaccurate, or misleading information, the individual will immediately be removed from their position and may be subject to further discipline in accordance with the *Discipline and Complaints Policy*.

Renewal

17. Unless the Screening Committee determines, on a case-by-case basis, to modify the submission requirements, individuals who are required to submit an E-PIC, Screening Disclosure Form, VSC, or Screening Renewal Form, are required to submit the documents as follows:
    a) An E-PIC every three years
    b) A Screening Disclosure Form every three years
    c) A Screening Renewal Form (**Appendix D**) every year
    d) A Vulnerable Sector Check once

18. At any time, including after either the submission of an individual's application or its approval (with or without conditions), the Screening Committee may re-open an individual's file for additional screening if it is advised of new information that, in the discretion of the Organization or a Member, could affect the assessment of the individual's suitability for participation in the programs of the Organization or a Member.

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Orientation, Training, and Monitoring

19. The type and amount of orientation, training, and monitoring will be based on the individual's level of risk, at the discretion of the Organization or the Member (as applicable).

20. Orientation may include, but is not limited to: introductory presentations, facility tours, equipment demonstrations, parent/Athlete meetings, meetings with colleagues and supervisors, orientation manuals, orientation sessions, and increased supervision during initial tasks or initial period of engagement.

21. Training may include, but is not limited to: certification courses, online learning, mentoring, workshop sessions, webinars, on-site demonstrations, and peer feedback.

22. 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.

23. Monitoring may include but is not limited to: written or oral reports, observations, tracking, electronic surveillance (e.g., facility security cameras), and site visits.

How to Obtain an E-PIC or VSC

24. Individuals may only obtain a VSC by visiting an RCMP office or police station, submitting two pieces of government-issued identification (one of which must have a photo), and completing any required paperwork. Fees may also be required.

25. Fingerprinting may be required if there is a positive match with the individual's gender and birth date.

26. The Organization and its Members understand that they may be required to assist an individual with obtaining a VSC. A Request for VSC (**Appendix E**) may need to be submitted or other documentation may need to be completed that describes the nature of the organization and the individual's role with Vulnerable Individuals.

Procedure

27. Screening documents must be submitted to the Screening Committee.

28. An individual who refuses or fails to provide the necessary screening documents will be ineligible to volunteer or apply for the position sought. The individual will be informed that their application and/or position will not proceed until such time as the screening documents are submitted.

29. The Organization and its Members understand that there may be delays in receiving the results of an E-PIC or a VSC. At the discretion of the Organization or a Member (as applicable), an individual may be permitted to participate in the role during the delay. This permission may be withdrawn at any time and for any reason.

30. The Organization and its Members recognize that different information will be available depending on the type of screening document that the individual has submitted. For example, an E-PIC may show details of a specific offense, or not, and/or a VSC may be returned with specific information or simply a notification indicating 'cleared' or 'not cleared'. The Screening Committee will use its expertise and discretion when making decisions based on the screening documents that have been submitted.

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31. Following the review of the screening documents, the Screening Committee will decide:
    a) The individual has passed screening and may participate in the desired position;
    b) The individual has passed screening and may participate in the desired position with conditions;
    c) The individual has not passed screening and may not participate in the desired position; or
    d) More information is required from the individual.

32. In making its decision, the Screening Committee will consider the type of offense, date of offense, and relevance of the offense to the position sought. The following examples are considered to be offenses that may cause the individual to not pass the screening requirements or to have conditions imposed on the individual by the Screening Committee:
    a) <u>If imposed in the last ten years</u>:
        i. Any offense involving the use of a motor vehicle, including, but not limited to, impaired driving
        ii. Any offense involving conduct against public morals
        iii. Any offense involving theft or fraud
    b) <u>If imposed at any time</u>:
        i. Any offense involving a Minor or Minors
        ii. Any offense of assault, physical or psychological violence
        iii. Any offense involving trafficking or possession of illegal drugs
        iv. Any offense involving the possession, distribution, or sale of any child-related pornography
        v. Any sexual offense

Conditions and Monitoring

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

Records

34. All records will be maintained in a confidential manner and will not be disclosed to others except as required by law, or for use in legal, quasi-legal, or disciplinary proceedings.

35. The records kept as part of the screening process include, but are not limited to:
    a) An individual's Vulnerable Sector Check
    b) An individual's E-PIC (for a period of three years)
    c) An individual's Screening Disclosure Form (for a period of three years)
    d) An individual's Screening Renewal Form (for a period of one year)
    e) Records of any conditions attached to an individual's registration by the Screening Committee
    f) Records of any discipline applied to any individual by the Organization, by a Member, or by another sport organization

Criminal Convictions

36. An individual's conviction for any of the following *Criminal Code* offenses may result in expulsion from the Organization and the Member and/or removal from designated positions, competitions, programs, activities and events upon the sole discretion of the Organization or the Member:

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a) Any offense of physical or psychological violence
b) Any crime of violence including, but not limited to, all forms of assault
c) Any offense involving trafficking of illegal drugs
d) Any offense involving the possession, distribution, or sale of any child-related pornography
e) Any sexual offense
f) Any offense involving theft or fraud

Policy History	
Approved	April 28 2025
Next Review Date	
Revision Approval Dates	

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Appendix A – Screening Requirements Matrix

Risk Level	Roles (Note Young People Exception Below)	Training Recommended/Required	Screening
Level 1 Low Risk	a) Parents, youth or volunteers acting in non-regular or informal basis	Recommended: • Respect in Sport for Activity Leaders	• Complete an Application Form (**Appendix B**) • Complete a Screening Disclosure Form (**Appendix C**) • Participate in training, orientation, and monitoring as determined by the organization
Level 2 Medium Risk	a) Athlete support personnel b) Non-coach employees or managers c) Directors d) Coaches who are typically under supervision of another coach e) Officials	Recommended based on role: • Respect in Sport for Activity Leaders • Commit to Kids Required: • Respect in Sport Activity Leaders (National Officials) • National Coaching Certification Program (NCCP) Making Ethical Decisions (MED) Certified (Coaches)	• Level 1 Requirements • Provide an E-PIC • Provide one letter of reference related to the position • Provide a driver's abstract, if requested
Level 3 High Risk	a) Full-time coaches b) Coaches who travel with Athletes c) Coaches who could be alone with Athletes	Recommended based on role: • Respect in Sport for Activity Leaders • Commit to Kids Required: • NCCP MED Certified (Coaches)	• Level 2 Requirements • Provide a VSC • Provide a second letter of reference from a sport organization

Young People
The Organization and its Members define a young person as someone who is younger than 18 years old. When screening young people, the Organization and its Members will:

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

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Appendix B – Application Form

Note: Individuals who are applying to volunteer or work within certain positions with the Organization or a Member must complete this Application Form. Individuals need to complete an Application Form once for the position sought. If the individual is applying for a new position within the Organization or within a Member, a new Application Form must be submitted.

NAME: _____
First Middle Last

CURRENT PERMANENT ADDRESS:

_____
Street City Province Postal

DATE OF BIRTH: _____ **GENDER IDENTITY**: _____
Month/Day/Year

EMAIL: _____ **PHONE**: _____

POSITION SOUGHT: _____

By signing this document below, I agree to adhere to the policies and procedures of the Organization and/or the Member (as applicable), including, but not limited to, the *Code of Conduct and Ethics*, *Conflict of Interest Policy*, *Privacy Policy*, and *Screening Policy*. Policies are located at the following link: [**insert link**]

I recognize that I must pass certain screening requirements depending on the position sought, as outlined in the *Screening Policy*, and that the Screening Committee will determine my eligibility to volunteer or work in the position.

NAME (print): _____ **DATE**: _____

SIGNATURE: _____

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Appendix C – Screening Disclosure Form

NAME: _____
First Middle Last

OTHER NAMES YOU HAVE USED: _____

CURRENT PERMANENT ADDRESS:

_____
Street City Province Postal

DATE OF BIRTH: _____ **GENDER IDENTITY**: _____
Month/Day/Year

CLUB (if applicable): _____ **EMAIL**: _____

Note: Failure to disclose truthful information below may be considered an intentional omission and may result in the loss of volunteer responsibilities or other privileges and/or disciplinary action.

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

Name or Type of Offense: _____

Name and Jurisdiction of Court/Tribunal: _____

Year Convicted: _____

Penalty or Punishment Imposed: _____

Further Explanation: _____

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

Name of disciplining or sanctioning body: _____

Date of discipline, sanction or dismissal: _____

Reasons for discipline, sanction or dismissal: _____

Penalty or Punishment Imposed: _____

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Further Explanation: _____

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

Name or Type of Offense: _____

Name and Jurisdiction of Court/Tribunal: _____

Name of disciplining or sanctioning body: _____

Further Explanation: _____

PRIVACY STATEMENT

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

CERTIFICATION

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

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

NAME (print): _____ **DATE**: _____

SIGNATURE: _____

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Appendix D – Screening Renewal Form

NAME: _____
First Middle Last

CURRENT PERMANENT ADDRESS:

_____
Street City Province Postal

DATE OF BIRTH: _____ **GENDER IDENTITY**: _____
Month/Day/Year

EMAIL: _____ **PHONE**: _____

By signing this document below, I certify that there have been no changes to my criminal record since I last submitted an Enhanced Police Information Check and/or Vulnerable Sector Check and/or Screening Disclosure Form to the Organization or to a Member. I further certify that there are no outstanding charges and warrants, judicial orders, peace bonds, probation or prohibition orders, or applicable non-conviction information, and there have been no absolute and conditional discharges.

I agree that any Enhanced Police Information Check and/or Vulnerable Sector Check and/or Screening Disclosure Form that I would obtain or submit on the date indicated below would be no different than the last Enhanced Police Information Check and/or Vulnerable Sector Check and/or Screening Disclosure Form that I submitted to the Organization or a Member. I understand that if there have been any changes, or if I suspect that there have been any changes, it is my responsibility to obtain and submit a new Enhanced Police Information Check and/or Vulnerable Sector Check and/or Screening Disclosure Form to the Screening Committee instead of this form.

I recognize that if there have been changes to the results available from the Enhanced Police Information Check and/or Vulnerable Sector Check and/or Screening Disclosure Form, and that if I submit this form improperly, then I am subject to disciplinary action and/or the removal of volunteer responsibilities or other privileges at the discretion of the Screening Committee.

NAME (print): _____ **DATE**: _____

SIGNATURE: _____

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Appendix E – Request For Vulnerable Sector Check

INTRODUCTION

Golf Newfoundland Labrador is requesting a Vulnerable Sector Check for _____ [insert individual's full name] who identifies as a _____ [insert gender identity] and who was born on _____ [insert birthdate].

DESCRIPTION OF ORGANIZATION

Golf Newfoundland Labrador is a provincial volunteer organization that is involved in the promotion and development of the sport of golf throughout the province. The organization is acknowledged as the Provincial Sport Organization (PSO) with the provincial government and is affiliated with several provincial and national sport organizations.

Our volunteers are involved in the planning, development and implementation of several programs throughout the year. These programs include Junior Development Camps and Provincial Championships involving participates ages 12 to 70 years of age.

DESCRIPTION OF ROLE

_____ [insert individual's name] will be acting as a _____ [insert individual's role]. In this role, the individual will have access to vulnerable individuals. Their conduct may include: coaching, chaperoning, driving and/or direct personal support.

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

CONTACT INFORMATION

If more information is required from Golf Newfoundland Labrador, please contact the Screening Committee Chair:

[Insert information for Screening Committee Chair]

Name: _____ Position: _____

Signature: _____ Date: _____

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CONFLICT OF INTEREST POLICY

Background

1. Individuals who act on behalf of an organization have a duty first to that organization and second to any personal stake they have in the operations of the Organization or its Members, as applicable. For example, in not-for-profit organizations, Directors are required, by law, to act as a trustee (in good faith, or in trust) of the organization. Directors, and other stakeholders, must not put themselves in positions where making a decision on behalf of the Organization or and its Members, as applicable, is connected to their own personal interests. That would be a conflict-of-interest situation.

Purpose

2. The Organization and its Members strive to reduce and eliminate nearly all instances of conflict of interest – by being aware, prudent, and forthcoming about the potential conflicts. This Policy describes how Individuals will conduct themselves in matters relating to conflict of interest and will clarify how Individuals shall make decisions in situations where conflict of interest may exist.

3. This Policy applies to all Individuals.

Obligations

4. Any real or perceived conflict of interest, whether pecuniary or non-pecuniary, between an Individual's personal interest and the interests of the Organization or its Members, as applicable, shall always be resolved in favour of the Organization or is Members, as applicable.

5. Individuals will not:
   a) Engage in any business or transaction, or have a financial or other personal interest, that is incompatible with their official duties with the Organization or its Members, as applicable, unless such business, transaction, or other interest is properly disclosed to and approved by the Organization or its Members, as applicable
   b) Knowingly place themselves in a position where they are under obligation to any person who might benefit from special consideration or who might seek preferential treatment
   c) In the performance of their official duties, give preferential treatment to family members, friends, colleagues, or organizations in which their family members, friends, or colleagues have an interest, financial or otherwise
   d) Derive personal benefit from information that they have acquired during the course of fulfilling their official duties, if such information is confidential or not generally available to the public
   e) Engage in any outside work, activity, or business or professional undertaking that conflicts or appears to conflict with their official duties as a representative of Organization or its Members, as applicable, or in which they have an advantage or appear to have an advantage on the basis of their association with Organization or its Members, as applicable
   f) Without the permission of Organization or its Members, as applicable, use organization property, equipment, supplies, or services for activities not associated with the performance of their official duties with the Organization or its Members, as applicable
   g) Place themselves in positions where they could, by virtue of being an Individual, influence decisions or contracts from which they could derive any direct or indirect benefit

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h) Accept any gift or favour that could be construed as being given in anticipation of, or in recognition for, any special consideration granted by virtue of being an Individual

Disclosure of Conflict of Interest

6. On an annual basis, all Directors and candidates for election to the Board, Officers, Employees, and Committee Members will complete a **Declaration Form** disclosing any real or perceived conflicts that they might have. Declaration Forms shall be retained by Organization or its Members, as applicable.

7. Individuals shall disclose real or perceived conflicts of interest immediately upon becoming aware that a conflict of interest may exist.

8. Individuals shall also disclose any and all affiliations with any and all other organizations involved with the same sport. These affiliations include any of the following roles: athlete, coach, manager, official, employee, volunteer, committee member or director.

Minimizing Conflicts of Interest in Decision-Making

9. Decisions or transactions that involve a conflict of interest that has been proactively disclosed by an Individual will be considered and decided with the following additional provisions:
   a) The nature and extent of the Individual's interest has been fully disclosed to the body that is considering or making the decision, and this disclosure is recorded or noted
   b) The Individual does not participate in discussion on the matter
   c) The Individual abstains from voting on the decision
   d) The decision is confirmed to be in the best interests of Organization or its Members, as applicable

10. For potential conflicts of interest involving employees, the Board will determine whether there is there a conflict and, if one exists, the employee will resolve the conflict by ceasing the activity giving rise to the conflict. The Organization or its Members, as applicable, will not restrict employees from accepting other employment contracts or volunteer appointments provided these activities do not diminish the employee's ability to perform the work described in the employee's job agreement with Organization or its Members, as applicable, or give rise to a conflict of interest.

Conflict of Interest Complaints

11. Any person who believes that an Individual may be in a conflict-of-interest situation should report the matter, in writing (or verbally if during a meeting), to the Board which will decide appropriate measures to eliminate the conflict. The Board may apply the following actions singly or in combination for real or perceived conflicts of interest:
    a) Removal or temporary suspension of certain responsibilities or decision-making authority
    b) Removal or temporary suspension from a designated position
    c) Removal or temporary suspension from certain teams, events, and/or activities
    d) Expulsion from the Organization or its Members, as applicable
    e) Other actions as may be considered appropriate for the real or perceived conflict of interest

12. Any person who believes that an Individual has made a decision that was influenced by real or perceived conflict of interest may submit a complaint, in writing, to the Organization or its Members, as applicable, to be addressed under the *Discipline and Complaints Policy*.

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13. Failure to comply with an action as determined by the Board will result in automatic suspension from Organization or its Members, as applicable, until compliance occurs.

14. The Board may determine that an alleged real or perceived conflict of interest is of such seriousness as to warrant suspension of designated activities pending a meeting and a decision of the Board.

Enforcement

15. Failure to adhere to this Policy may permit discipline in accordance with the *Discipline and Complaints Policy*.

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Conflict of Interest - Declaration Form

I have read the *Conflict-of-Interest Policy*, I agree to be bound by the obligations contained therein, and I commit to avoid any conflict of interest. I also commit to disclosing the existence of any real or perceived conflict of interest to the Organization or its Members, as applicable, as soon as it is known to me.

I declare the following interests which may represent a potential conflict of interest:

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____ _____ _____

Name **Signature** **Date**

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FINANCIAL POLICY

Purpose

1. The Organization and its Members will function as a not-for-profit and all fundraising, fees, sponsorship, and grants will be used for the on-going development of the sport and the betterment of the Organization or its Members, as applicable.

2. The purpose of this Policy is to guide the financial management practices of the Organization and its Members.

Budget and Reports

3. The Board will develop and approve an annual budget which will contain the Organization or its Members', as applicable, total anticipated expenditures and revenues.

4. The Treasurer (or designate) will, at the Annual Meeting, present Financial Statements as required by applicable legislation and any other report as determined by the Board.

5. The financial statements will be reviewed in accordance with applicable legislation by an auditor.

Fiscal Year

6. The Organization or its Members', as applicable, fiscal year will be as described in the By-laws.

Banking - Revenue

7. Registration fees shall be reviewed annually by the Treasurer who will make recommendations to the Board; which shall approve fees for each year well in advance of the start of the registration year.

8. All money received will be placed into a general fund and will be used for all necessary and permitted purposes for the operation of the Organization or its Members', as applicable, as determined by the Board.

9. All money received will be deposited, in the name of the Organization or its Members', as applicable, with a reputable financial institution.

Signing Officers

10. All contracts, documents, or any other instruments in writing requiring the signature of the Organization or its Members', as applicable, shall be signed by at least two of the following:
    a) Executive Director
    b) President
    c) Treasurer
    d) A Director appointed by the Board as a signing authority

11. All cheques require signatures from two (2) of the following:
    a) Executive Director
    b) President
    c) Two Directors appointed by the Board as signing authorities

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12. All cheques payable to any signing authority will not be signed by that signing authority.

Expenses

13. All expenses will be supported with receipts and must be detailed to budget items, projects, or functions by the Executive Director.

14. Approved expenses are to be claimed and reported no later than thirty (30) days following the date of the expense. Expenses submitted beyond the thirty (30) day reporting requirement will be paid only upon the Board's approval.

15. Any expenditure not approved within the annual budget will be approved by the Board prior to any such expenditure. Without the Board's approval, the expenditure will not be paid unless determined otherwise by the Board.

Accounts

16. Accounts receivable terms are net ninety (90) days from the date of invoice.

17. Accounts payable will be paid within the terms of the supplier invoice. Where no terms are specified, accounts will be paid within thirty (30) days.

Credit Card

18. With the approval of the Board, the Organization or its Members', as applicable, may acquire credit cards for the use of staff members who are required to make purchases on a regular basis for travel, accommodation, and other expenses related to their duties. The Board will determine who receives credit cards and what the credit card limits will be.

19. Credit card holders will be responsible for all charges made on credit cards issued in their name.

20. Credit cards must only be used for authorized payments that include:
    a) Payment of actual and reasonable expenses incurred on authorized business, including travel and accommodation, where it is not feasible for these costs to have been paid in advance of the expense being incurred or for the costs to be invoiced to the Organization or its Members', as applicable
    b) Purchase of goods or budgeted items

21. For the purposes of this Policy, expenses included in an annual budget as approved by the Board are authorized. Expenses that fall outside the approved budget must be approved before being charged to a credit card.

22. Credit cards are not to be used for any personal expenses.

23. All expenses charged to a credit card should be supported by a credit card receipt issued by the merchant or a detailed supplier invoice to confirm that the expenses are properly incurred.

24. Under no circumstances are cash advances to be drawn on credit cards.

25. In addition, the following individuals have credit card responsibilities:
    a) Cardholders must:

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i. not allow another person to use the card
ii. protect the pin number of the card
iii. only purchase within the credit limit of the card
iv. notify the credit card company if the card is lost or stolen
v. always keep the card with them, or in a secure location
vi. forward to the Treasurer, monthly, all receipts for expenses charged to the card in the previous month
vii. surrender the credit card upon the cardholder ceasing to perform the role for which the card was issued

b) The Treasurer must:
i. ensure that each credit card issued to an individual is paid in full monthly
ii. review and reconcile each credit card statement monthly
iii. bring to the attention of the Board any credit card expense which does not appear to be authorized under this policy
iv. recover from the cardholder any funds owing for unauthorized expenses

Expense Claims

26. Individuals may submit expense claims to the Executive Director (or designate) for personal expenses incurred in performing their duties for the Organization or its Members', as applicable. Generally, only expenses pre-approved by the Treasurer (or designate) will be reimbursed - and only within three months of the incurred expense. Expense claims must include:
    a) The exact amount each separate expense
    b) The date on which the expense occurred
    c) The place and location of the expense
    d) The purpose of the expense
    e) A receipt for the expense

27. Individuals may submit expense claims to the Executive Director (or designate) for travel and/or accommodation expenses for conferences, tournaments, provincial meetings, or national meetings; provided the expected expense reimbursement amount is pre-approved by the Executive Director (or designate).

28. Generally, no cash advances will be provided. If there is a need for a cash advance, a request must be made to the Treasurer for approval of the advance.

29. Expenses will be reimbursed in amounts outlined in Schedule A:

30. The Organization or its Members, as applicable, will not reimburse for costs above the specified rates without prior approval of the Treasurer. Where costs above the specified rates are approved, receipts must be provided.

Travel and Accommodation Expenses

31. Air travel is to be booked through the Organization or its Members, as applicable, whenever possible. Air travel including fares and itineraries is to be approved in advance by the Treasurer. In no circumstance will fares above the economy fare be reimbursed. Car travel will be reimbursed at the mileage rate specified in this Policy. Car rentals will be reimbursed where authorized. Reimbursement will be for compact size cars through an authorized agency at the most economical rate possible. Individuals are expected to travel as foot-passengers where possible. Advance booking fees will be reimbursed where required by the nature and purpose of the travel.

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32. Whenever possible, Individuals who are attending the same event should travel together and stay with friends or event organizers where possible. However, only the driver may submit car-related expenses.

33. The Organization or its Members', as applicable, will not provide reimbursement for parking tickets, speeding tickets or fines for any other violations.

34. An Individual attending an event where meals are not provided may request a per-diem allowance before attending the event. Per-diem rates are listed in the above table. Individuals will not be reimbursed where meals are provided as part of an event or where meals are included in the accommodation rate.

Other Expenses

35. Actual and reasonable expenses for items such as parking, telephones and copying may be reimbursed. Receipts must be provided for all such expenses.

NSF Charges

36. The Organization or its Members, as applicable, will charge a twenty-five-dollar ($25.00) charge on all NSF Cheques.

Replacement Cheques

37. Lost or missing cheques will not be re-issued until after the next applicable month end reconciliation has taken place.

38. Cheques that need to be replaced due to loss will be assessed a five-dollar ($5.00) administration fee.

39. Lost or missing cheques that have not been claimed by the Organization or its Members', as applicable, year end will not be reissued.

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Schedule A
Expense Reimbursements

Expense	Rate	Notes
Travel – Mileage up to 50 km return travel	Nil	
Travel – Mileage over 50 km return travel	$0.52 per kilometre	
Travel – Air	Lowest economy	Prior approval required
Breakfast	$15.00	Receipts not required
Lunch	$20.00	Receipts not required
Dinner	$25.00	Receipts not required
Full Day	$60.00	Receipts not required
Accommodation	Double occupancy	All personnel unless specified
Accommodation with Friends or Family	$12.00 / day	Receipts not required
Travel Status (conducting the business of the Club for at least 12 hours a day)	$10.00 / day inside Canada $20.00 / day outside Canada	Receipts not required
Incidental expenses	Actual cost	Receipt required

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