



Policies and Procedures Manual 2026

Updated June 23, 2026

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POLICY/PROCEDURE TITLE	EFFECTIVE DATE	DATE OF LAST REVISION	DATE OF LAST REVIEW
Code of Conduct and Ethics	July 30, 2018	October 29, 2019	October 29, 2019
Abuse	October 29, 2019	October 29, 2019	October 29, 2019
Athlete Protection	September 12, 2021		
Investigations - Discrimination, Harassment and Abuse	October 29, 2019	October 29, 2019	October 29, 2019
Discipline and Complaints	July 30, 2018	October 29, 2019	October 29, 2019
Dispute Resolution	July 30, 2018	October 29, 2019	October 29, 2019
Appeal	July 30, 2018	August 29, 2025	August 29, 2025
Whistleblower	October 29, 2019	October 29, 2019	October 29, 2019
Event Discipline	October 29, 2019	October 29, 2019	October 29, 2019
Match Manipulation Policy	January 20, 2025		
Social Media Policy	October 29, 2019	October 29, 2019	October 29, 2019
Communication Policy	January 22, 2022		
Confidentiality	July 30, 2018	August 29, 2025	August 29, 2025
Conflict of Interest	July 30, 2018	October 29, 2019	October 29, 2019
Concussion & Return to Play Guidelines	October 29, 2019	October 29, 2019	October 29, 2019
Inclusion & Access	October 29, 2019	October 29, 2019	October 29, 2019
Transgender and Non-Binary Inclusion Policy	November 2022	August 29, 2025	August 29, 2025
Screening	March 2, 2019	March 2, 2019	October 29, 2019
Risk Management	September 12, 2021		
Banner	March 30, 2019	March 30, 2019	October 29, 2019
Travel & Expense	July 30, 2018	October 29, 2019	October 29, 2019
Purchasing	July 30, 2018	October 29, 2019	October 29, 2019
Large Event	October 29, 2019	October 17, 2021	
Investment Policy	November 13, 2021	May 23, 2026	May 23, 2026
Financial	July 30, 2018	July 30, 2018	October 29, 2019

CODE OF CONDUCT AND ETHICS

DEFINITIONS

1. The following terms have these meanings in this Code:
 - a) “*Individuals*” – Individuals employed by, or engaged in activities with Curling Alberta including, but not limited to, athletes, coaches, convenors, officials, volunteers, managers, administrators, committee members, parents and guardians and spectators at events, and Directors and Officers of Curling Alberta
 - b) “*Workplace*” - Any place where business or work-related activities are conducted. Workplaces include but are not limited to Curling Alberta’s office, work-related social functions, work assignments outside of Curling Alberta’s offices, work-related travel, the training and competition environment, and work-related conferences or training sessions
 - c) “*Abuse*” – As defined in Curling Alberta’s *Abuse Policy*
 - d) “*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.
 - e) “*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 behavior that constitute Harassment include, but are not limited to:
 - i. Written or verbal abuse, threats, or outbursts;
 - ii. Persistent unwelcome remarks, jokes, comments, innuendo, or taunts;
 - iii. Racial harassment, which is racial slurs, jokes, name calling, or insulting behavior or terminology that reinforces stereotypes or discounts abilities because of racial or ethnic origin;
 - iv. Leering or other suggestive or obscene gestures;
 - v. Condescending or patronizing behavior which is intended to undermine self-esteem, diminish performance or adversely affect working conditions;
 - vi. Practical jokes which endanger a person’s safety, or may negatively affect performance;
 - vii. 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;
 - viii. Unwanted physical contact including, but not limited to, touching, petting, pinching, or kissing;
 - ix. Deliberately excluding or socially isolating a person from a group or team;
 - x. Persistent sexual flirtations, advances, requests, or invitations;
 - xi. Physical or sexual assault;
 - xii. Behaviors 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
 - xiii. Retaliation or threats of retaliation against a person who reports harassment to Curling Alberta.
- f) *“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 behavior that constitute Workplace Harassment include, but are not limited to:
- i. Bullying;
 - ii. Workplace pranks, vandalism, bullying or hazing;
 - iii. Repeated offensive or intimidating phone calls or emails;
 - iv. Inappropriate sexual touching, advances, suggestions or requests;
 - v. Displaying or circulating offensive pictures, photographs or materials in printed or electronic form;
 - vi. Psychological abuse;
 - vii. Excluding or ignoring someone, including persistent exclusion of a person from work-related social gatherings;
 - viii. Deliberately withholding information that would enable a person to do his or her job, perform or train;
 - ix. Sabotaging someone else's work or performance;
 - x. Gossiping or spreading malicious rumors;
 - xi. Intimidating words or conduct (offensive jokes or innuendos); and
 - xii. Words or actions which are known or should reasonably be known to be offensive, embarrassing, humiliating, or demeaning.
- g) *“Sexual Harassment”* – A course of vexatious comment or conduct against an Individual because of sex, sexual orientation, gender identify or gender expression, where the course of comment or conduct is known or ought reasonably to be known to be unwelcome; or making a sexual solicitation or advance where the person making the solicitation or advance is in a position to confer, grant or deny a benefit or advance to the Individual and the person knows or ought reasonably to know that the solicitation or advance is unwelcome. Types of behavior that constitute Sexual Harassment include, but are not limited to:
- i. Sexist jokes;
 - ii. Threats, punishment, or denial of a benefit for refusing a sexual advance;
 - iii. Offering a benefit in exchange for a sexual favor;
 - iv. Demanding hugs;
 - v. Bragging about sexual ability;
 - vi. Leering (persistent sexual staring);
 - vii. Sexual assault;
 - viii. Display of sexually offensive material;
 - ix. Distributing sexually explicit messages or attachments such as pictures or video files;
 - x. Sexually degrading words used to describe an Individual;
 - xi. Unwelcome inquiries into or comments about an Individual's gender identity or physical appearance;
 - xii. Inquiries or comments about an Individual's sex life;
 - xiii. Persistent, unwanted attention after a consensual relationship ends;

- xiv. Persistent unwelcome sexual flirtations, advances, or propositions; and
 - xv. Persistent unwanted contact.
- h) “*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 behavior 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 behavior that constitute Workplace Violence include, but are not limited to:
- i. Verbal or written threats to attack;
 - ii. Sending to or leaving threatening notes or emails;
 - iii. Physically threatening behavior such as shaking a fist at someone, finger pointing, destroying property, or throwing objects;
 - iv. Wielding a weapon in a Workplace;
 - v. Hitting, pinching or unwanted touching which is not accidental;
 - vi. Dangerous or threatening horseplay;
 - vii. Physical restraint or confinement;
 - viii. Blatant or intentional disregard for the safety or wellbeing of others;
 - ix. Blocking normal movement or physical interference, with or without the use of equipment;
 - x. Sexual violence; and
 - xi. Any attempt to engage in the type of conduct outlined above.

PURPOSE

2. The purpose of this Code is to ensure a safe and positive environment (within Curling Alberta's programs, activities, and events) by making Individuals aware that there is an expectation, at all times, of appropriate behavior consistent with Curling Alberta's core values. Curling Alberta supports equal opportunity, prohibits discriminatory practices, and is committed to providing an environment in which all individuals are treated with respect and fairness.

APPLICATION OF THIS CODE

3. This Code applies to Individuals' conduct during Curling Alberta's business, activities, and events including, but not limited to, competitions, practices, tryouts, training camps, travel associated with Curling Alberta's activities, Curling Alberta's office environment, and any meetings.
4. An Individual who violates this Code may be subject to sanctions pursuant to Curling Alberta's *Discipline and Complaints Policy*. In addition to facing possible sanction pursuant to Curling Alberta's *Discipline and Complaints Policy*, an Individual who violates this Code during a competition may be ejected from the competition or the playing area, the official may delay the competition until the Individual complies with the ejection, and the Individual may be subject to any additional discipline associated with the competition.
5. An employee of Curling Alberta found to have engaged in acts of violence or harassment against any other employee, worker, contractor, member, customer, supplier, client or other third party during business hours, or at any event of Curling Alberta, will be subject to appropriate disciplinary action subject to the terms of any of Curling Alberta's relevant and applicable policies as well as the employee's Employment Agreement (if applicable).

6. This Code also applies to Individuals' conduct outside of Curling Alberta's business, activities, and events when such conduct adversely affects relationships within Curling Alberta (and its work and sport environment) and is detrimental to the image and reputation of Curling Alberta. Such applicability will be determined by Curling Alberta at its sole discretion.

RESPONSIBILITIES

7. Individuals have a responsibility to:
 - a) Maintain and enhance the dignity and self-esteem of Curling Alberta's 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 members;
 - 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.
 - b) Refrain from any behavior that constitutes Harassment, Workplace Harassment, Sexual Harassment, Workplace Violence, or Discrimination
 - c) Abstain from the non-medical use of drugs or the use of performance-enhancing drugs or methods. More specifically, Curling Alberta adopts and adheres to the Canadian Anti-Doping Program. Any infraction under this Program shall be considered an infraction of this Code and may be subject to further disciplinary action, and possible sanctions pursuant to Curling Alberta's *Discipline and Complaints Policy*. Curling Alberta will respect any penalty enacted pursuant to a breach of the Canadian Anti-Doping Program, whether imposed by Curling Alberta or any other sport organization
 - d) Refrain from associating with any person for the purpose of coaching, training, competition, instruction, administration, management, athletic development, or supervision of the sport, who has incurred an anti-doping rule violation and is serving a sanction involving a period of ineligibility imposed pursuant to the Canadian Anti-Doping Program and/or the World Anti-Doping Code and recognized by the Canadian Centre for Ethics in Sport (CCES)
 - e) Refrain from the use of power or authority in an attempt to coerce another person to engage in inappropriate activities
 - f) Refrain from consuming tobacco products, or recreational drugs while participating in Curling Alberta's programs, activities, competitions, or events
 - g) In the case of minors, not consume alcohol, tobacco, or cannabis at any competition or event;
 - h) In the case of adults, not consume cannabis in the Workplace or in any situation associated with Curling Alberta's events (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 associated with Curling Alberta's events
 - i) Respect for the property of others and not willfully cause damage

- j) Promote the sport in the most constructive and positive manner possible
- k) When driving a vehicle with an Individual:
 - i. Not have his or her license suspended;
 - ii. Not be under the influence of alcohol or illegal drugs or substances; and
 - i. Have valid car insurance
- l) Adhere to all federal, provincial, municipal and host country laws
- m) Refrain from engaging in deliberate cheating which is intended to manipulate the outcome of a competition and/or not offer or receive any bribe which is intended to manipulate the outcome of a competition
- n) Comply, at all times, with Curling Alberta's bylaws, policies, procedures, and rules and regulations, as adopted and amended from time to time

DIRECTORS, COMMITTEE MEMBERS, AND STAFF

- 8. In addition to section 7 (above), Curling Alberta's Directors, Committee Members, and Staff will have additional responsibilities to:
 - a) Function primarily as a Director or Committee Member or Staff Member of Curling Alberta; not as a member of any other member or constituency
 - b) Act with honesty and integrity and conduct themselves in a manner consistent with the nature and responsibilities of Curling Alberta's business and the maintenance of Individuals' confidence
 - c) Ensure that Curling Alberta's financial affairs are conducted in a responsible and transparent manner with due regard for all fiduciary responsibilities
 - d) Conduct themselves transparently, professionally, lawfully and in good faith in the best interests of Curling Alberta
 - e) Be independent, impartial, and not be influenced by self-interest, outside pressure, expectation of reward, or fear of criticism
 - f) Behave with decorum appropriate to both circumstance and position
 - g) Keep informed about Curling Alberta's activities, the sport community, and general trends in the sectors in which it operates
 - h) Exercise the degree of care, diligence, and skill required in the performance of their duties pursuant to the laws under which Curling Alberta is incorporated
 - 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 of Curling Alberta's governing documents
 - m) Conform to the bylaws and policies approved by Curling Alberta

COACHES

- 9. In addition to section 7 (above), coaches 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, consciously or unconsciously. Coaches 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 involved
 - 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
 - d) Support the coaching staff of a training camp, provincial 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 sports 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 Curling Alberta's *Screening Policy and all eligibility requirements as detailed in the current Competitors' Guide*, if applicable
 - i) Report to Curling Alberta any ongoing criminal investigation, conviction, or existing bail conditions, including those for violence, child pornography, or possession, use, or sale of any illegal substance
 - j) Under no circumstances provide, promote, or condone the use of drugs (other than properly prescribed medications) or performance-enhancing substances and, in the case of minors, alcohol, cannabis, and/or tobacco
 - k) Respect athletes playing with other teams 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 relationship with an athlete under the age of majority;
 - m) Disclose any sexual or intimate relationship with an athlete over the age of majority to Curling Alberta and immediately discontinue any coaching involvement with that athlete;
 - n) 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
 - o) Dress professionally, neatly, and inoffensively
 - p) 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) Report any medical problems in a timely fashion, when such problems may limit their ability to travel, practice, or compete;
 - b) Participate and appear on-time and prepared to participate to their best abilities in all competitions, practices, training sessions, tryouts, tournaments, and events
 - c) 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
 - d) Adhere to Curling Alberta's rules and requirements regarding clothing and equipment
 - e) Act in a sportsmanlike manner and not display appearances of violence, foul language, or gestures to other athletes, officials, coaches, or spectators
 - f) Dress to represent the sport and themselves well and with professionalism
 - g) Act in accordance with Curling Alberta's 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 rules changes
 - b) Not publicly criticize other officials or any club or association;
 - c) Work within the boundaries of their position's description while supporting the work of other officials
 - d) Act as an ambassador of Curling Alberta 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) Not publicly criticize other officials or any club or association
 - h) Act openly, impartially, professionally, lawfully, and in good faith
 - i) Be fair, equitable, considerate, independent, honest, and impartial in all dealings with others
 - j) Respect the confidentiality required by issues of a sensitive nature, which may include ejections, defaults, forfeits, discipline processes, appeals, and specific information or data about Individuals
 - k) Honour all assignments unless unable to do so by virtue of illness or personal emergency, and in these cases inform the assignor or association at the earliest possible time
 - l) When writing reports, set out the actual facts
 - m) Dress in proper attire for officiating

PARENTS/GUARDIANS AND SPECTATORS

- 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 performance or practice
 - d) Provide positive comments that motivate and encourage participants' continued effort
 - e) Respect the decisions and judgments of officials, and encourage athletes to do the same
 - f) Never question an official's or staff member's judgment or honesty
 - g) Support all efforts to remove verbal and physical abuse, coercion, intimidation, and sarcasm
 - h) Respect and show appreciation to all competitors, and to the coaches, officials and other volunteers
 - i) Not harass competitors, coaches, officials, parents/guardians, or other spectators

ABUSE POLICY

DEFINITIONS

1. The following terms have these meanings in this Policy:
 - a) “*Vulnerable Individuals*” – Includes Children / Youth (minors) and Vulnerable Adults (people who, because of age, disability or other circumstance, are in a position of dependence on others or are otherwise at a greater risk than the general population of being harmed by people in positions of trust or authority);
 - b) “*Individuals*” – All categories of membership defined in Curling Alberta’s Bylaws, as well as all individuals employed by, or engaged in activities with Curling Alberta including, but not limited to, volunteers, managers, administrators, committee members, and Directors and Officers of Curling Alberta; and
 - c) “*Abuse*” – Child/Youth Abuse or Vulnerable Adult Abuse as described in this Policy.

PURPOSE

2. Curling Alberta is 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 Curling Alberta will work to prevent abuse, and how abuse or suspected abuse can be reported to and addressed by Curling Alberta.

ZERO TOLERANCE STATEMENT

3. Curling Alberta has zero tolerance for any type of abuse. Individuals are required to report instances of abuse or suspected abuse to Curling Alberta to be immediately addressed under the terms of the applicable policy.

EDUCATION – WHAT IS ABUSE

4. Vulnerable Individuals can be abused in different forms.
5. The following description of Child / Youth Abuse has been modified and adapted from Ecclesiasticus’s *Guidelines for Developing a Safety & Protection Policy for Children / Youth / Vulnerable Adults*:

Child / Youth Abuse

6. “Child abuse” refers to the violence, mistreatment or neglect that a child or adolescent may experience while in the care of someone they depend on or trust. There are many different forms of abuse and a child may be subjected to more than one form:
 - a) Physical abuse involves single or repeated instances of deliberately using force against a child in such a way that the child is either injured or is at risk of being injured. Physical abuse includes beating, hitting, shaking, pushing, choking, biting, burning, kicking or assaulting a child with a weapon. It also includes holding a child under water, or any other dangerous or harmful use of force or restraint.
 - b) Sexual abuse and exploitation involve using a child for sexual purposes. Examples of child sexual abuse include fondling, inviting a child to touch or be touched sexually, intercourse, rape, incest, sodomy, exhibitionism, or involving a child in prostitution or pornography.
 - c) Neglect is often chronic, and it usually involves repeated incidents. It involves failing to provide what a child needs for his or her physical, psychological or emotional development and well being. For example, neglect includes failing to

provide a dependent child with food, clothing, shelter, cleanliness, medical care, or protection from harm.

- d) Emotional abuse involves harming a child's sense of self-worth. It includes acts (or omissions) that result in, or place a child at risk of, serious behavioural, cognitive, emotional, or mental health problems. For example, emotional abuse may include aggressive verbal threats, social isolation, intimidation, exploitation, or routinely making unreasonable demands. It also includes exposing the child to violence.
7. 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 form over time.
8. Abuse of children or youth in sport can include emotional maltreatment, neglect, and physical maltreatment.
- a) Emotional Maltreatment – A coach's failure to provide a developmentally-appropriate and supportive environment. Emotional abuse is at the foundation of all other forms of maltreatment (sexual, physical and neglect). In sports, this conduct has the potential to cause emotional or psychological harm to an athlete when it is persistent, pervasive or patterned acts (i.e., yelling at an athlete once does not constitute maltreatment). Examples of emotional maltreatment include:
 - i. Refusal to recognize an athlete's worth or the legitimacy of an athlete's needs (including complaints of injury/pain, thirst or feeling unwell)
 - ii. Creating a culture of fear, or threatening, bullying or frightening an athlete
 - iii. Frequent name-calling or sarcasm that continually "beats down" an athlete's self-esteem
 - iv. Embarrassing or humiliating an athlete in front of peers
 - v. Excluding or isolating an athlete from the group
 - vi. Withholding attention
 - vii. Encouraging an athlete to engage in destructive and antisocial behaviour, reinforcing deviance, or impairing an athlete's ability to behave in socially appropriate ways
 - viii. Over-pressuring; whereby the coach imposes extreme pressure upon the athlete to behave and achieve in ways that are far beyond the athlete's capabilities
 - ix. Verbally attacking an athlete personally (e.g., belittling them or calling them worthless, lazy, useless, fat or disgusting).
 - x. Routinely or arbitrarily excluding athletes from practice
 - xi. Using conditioning as punishment
 - xii. Throwing sports equipment, water bottles or chairs at, or in the presence of, athletes
 - xiii. Body shaming – making disrespectful, hurtful or embarrassing comments about an athlete's physique
 - b) Neglect - acts of omission (i.e., the coach should act to protect the health/well-being of an athlete but does not). Examples of neglect include:
 - i. Isolating an athlete in a confined space or stranded on equipment, with no supervision, for an extended period

- ii. Withholding, recommending against, or denying adequate hydration, nutrition, medical attention or sleep
 - iii. Ignoring an injury
 - iv. Knowing about sexual abuse of an athlete but failing to report it
 - c) Physical Maltreatment - involves contact or non-contact behavior that can cause physical harm to an athlete. It also includes any act or conduct described as physical abuse or misconduct (e.g., child abuse, child neglect and assault). Almost all sport involves strenuous physical activity. Athletes regularly push themselves to the point of exhaustion. However, any activity that physically harms an athlete—such as extreme disciplinary actions or punishment—is unacceptable. Physical maltreatment can extend to seemingly unrelated areas including inadequate recovery times for injuries and restricted diet. Examples of physical maltreatment include:
 - i. Punching, beating, biting, striking, choking or slapping an athlete
 - ii. Intentionally hitting an athlete with objects or sporting equipment
 - iii. Providing alcohol to an athlete under the legal drinking age
 - iv. Providing illegal drugs or non-prescribed medications to any athlete
 - v. Encouraging or permitting an athlete to return to play prematurely or without the clearance of a medical professional, following a serious injury (e.g., a concussion)
 - vi. Prescribed dieting or other weight-control methods without regard for the nutritional well-being and health of an athlete
 - vii. Forcing an athlete to assume a painful stance or position for no athletic purpose, or excessive repetition of a skill to the point of injury
 - viii. Using excessive exercise as punishment (e.g., stretching to the point of causing the athlete to cry, endurance conditioning until the athlete vomits)
9. 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.
10. 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 seems 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

Vulnerable Adult Abuse

11. 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.
12. 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:
 - a) Psychological abuse includes attempts to dehumanize or intimidate vulnerable adults. Any verbal or non-verbal act that reduces their sense of self-worth or dignity and threatens their psychological and emotional integrity is abuse. This type of abuse may include, for example
 - i. Threatening to use violence
 - ii. Threatening to abandon them
 - iii. Intentionally frightening them
 - iv. Making them fear that they will not receive the food or care they need
 - v. Lying to them
 - vi. Failing to check allegations of abuse against them
 - b) Financial abuse encompasses financial manipulation or exploitation, including theft, fraud, forgery, or extortion. It includes using a vulnerable adult's money or property in a dishonest manner or failing to use a vulnerable adult's assets for their welfare. Abuse occurs any time someone acts without consent in a way that financially or personally benefits one person at the expense of another. This type of abuse against a vulnerable adult may include, for example:
 - i. Stealing their money, disability cheques, or other possessions
 - ii. Wrongfully using a Power of Attorney
 - iii. Failing to pay back borrowed money when asked
 - c) Physical abuse includes any act of violence – whether or not it results in physical injury. Intentionally inflicting pain or injury that results in either bodily harm or mental distress is abuse. Physical abuse may include, for example:
 - i. Beating
 - ii. Burning or scalding
 - iii. Pushing or shoving
 - iv. Hitting or slapping
 - v. Rough handling
 - vi. Tripping
 - vii. Spitting
 - d) All forms of sexual abuse are also applicable to vulnerable adults
13. 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

14. Curling Alberta will enact measures aimed at preventing abuse. These measures include screening, orientation, training, practice, and monitoring.

Screening

15. Individuals who coach, volunteer, officiate, deliver developmental programs, are affiliated with provincial teams, accompany a team to an event or competition, are paid staff, or otherwise engage with Vulnerable Individuals involved with Curling Alberta will be screened according to the organization's *Screening Policy*.
16. Curling Alberta 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 (for Individuals who transport Vulnerable Individuals)
 - f) Other screening procedures, as required
17. 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

18. Curling Alberta will 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*.
19. 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.
20. Training may include, but is not limited to: certification courses, online learning, mentoring, workshop sessions, webinars, on-site demonstrations, and peer feedback.
21. At the conclusion of the orientation and training, Individuals will be required to acknowledge, in written form, that they have received and completed the training.

Practice

22. When Individuals interact with Vulnerable Individuals, they are 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 adult
- c) Ensuring that more than one person is responsible for 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 Individuals 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 Curling Alberta's *Code of Conduct and Ethics* and *Social Media Policy*.
- f) When traveling with Vulnerable Individuals, the Individual will not transport Vulnerable Individuals without another adult present and will not stay in the same overnight accommodation location without additional adult supervision.

Monitoring

- 23. Curling Alberta 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*.
- 24. 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

- 25. 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, Curling Alberta or the 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.
- 26. Complaints or reports that describe an element of abuse will be addressed by the process(es) described in Curling Alberta's *Discipline and Complaints Policy* and the *Investigations Policy - Discrimination, Harassment and Abuse*.

ATHLETE PROTECTION POLICY

PURPOSE

1. This Athlete Protection Policy describes how Persons in Authority as defined in the Code of Conduct and Ethics Policy, shall maintain a safe sport environment for all Athletes.

INTERACTIONS BETWEEN PERSONS IN AUTHORITY AND ATHLETES – THE ‘RULE OF TWO’

2. Curling Alberta strongly recommends 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. Curling Alberta recognizes that fully implementing the ‘Rule of Two’, as described above (and modified accordingly for Persons in Authority), in all circumstances, may not always be possible.

Consequently, at a minimum, interactions between Persons in Authority and Athletes must respect the following:

- i. The training environment should be open to observation so that all interactions between Persons in Authority and athletes are observable.
- ii. Private or one-on-one situations must be avoided unless they are observable or within earshot of another adult or athlete.
- iii. Vulnerable Individuals must not be in any situation where they are alone with a Person in Authority without another athlete or screened adult present unless prior written permission is obtained from the Vulnerable Individual’s parent or guardian.

4. In addition to respecting the minimum requirements described above, it is strongly recommended that:
 - a) Teams or groups of athletes always have at least two Persons in Authority with them;
 - b) For mixed gender teams or groups of athletes, there will 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;

PRACTICES AND COMPETITIONS

5. As it relates to practices and/or competitions, the following shall be respected:
 - a) If the Vulnerable Individual is the first athlete to arrive, the athlete's parent should remain until another athlete or Person in Authority arrives.
 - b) If a Vulnerable Individual would potentially be alone with a Person in Authority following a competition or practice, the Person in Authority should ask another Person in Authority (or a parent or guardian of another athlete) to stay until all of the athletes have been picked up. If an adult is unavailable, another athlete, who is preferably not a Vulnerable Individual, should be present in order to avoid the Person in Authority being alone with a single Vulnerable Individual.

COMMUNICATIONS

6. 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 personal texts, direct messages on social media or emails to individual athletes when necessary and only for communicating information related to team issues and activities (e.g., non-personal information). Any such texts, messages or emails shall be professional in tone.
 - c) No personal texts between Vulnerable Individuals and Persons in Authority are to be sent; however, if this is necessary, it should include one other adult person on the message.
 - d) Parents and guardians of Vulnerable Individuals 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 Persons in Authority and athletes must be between the hours of 6:00am 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 is permitted nor may such items be communicated by any medium
 - h) Persons in Authority are not permitted to ask athletes to keep a secret for them
 - i) A Person in Authority should not become overly-involved in an athlete's personal life

TRAVEL

7. 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 will 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 with an athlete alone unless the Person in Authority is the athlete's parent or guardian - if it cannot be avoided, the athlete must ride in the back seat.
 - 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

LOCKER ROOM / CHANGING AREAS

- 8. The following shall apply to locker rooms, changing areas, and meeting rooms:
 - a) Interactions (i.e., conversation) between Persons in Authority and athletes should not occur in any room where there is a reasonable expectation of privacy such as a locker room, restroom or changing area. A second adult should be present for any necessary interaction between an adult and an athlete in any such room (e.g., adhering to 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, including but not limited to team communications and/or emergency

PHOTOGRAPHY/VIDEO

- 9. Any photograph or video involving athletes 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 misplaced apparel 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 – Image Consent Form) must be completed before any images are taken and used

PHYSICAL CONTACT

- 10. 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 not possible 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) Making amends, such as an apology or explanation, is encouraged to further help educate athletes on the difference between appropriate and inappropriate contact
 - d) Hugs lasting longer than five (5) 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 crying or celebrating after a 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

11. Any alleged violations of this *Athlete Protection Policy* shall be addressed pursuant to Curling Alberta's *Discipline and Complaints Policy*.

APPENDIX A – IMAGE CONSENT FORM

1. I hereby grant to (INSERT SPORT ORGANIZATION NAME HERE) (the "Organization") 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 and/or through electronic media (collectively the "Images"), and to use the Images to promote the sport and/or the Organization 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 Organization, 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.

Signed at this _____ day of _____, 20_____.

Print Name of Participant: _____

Signature of Participant: _____

Signature of Parent/Guardian (if Participant is younger than the age of majority):

INVESTIGATIONS POLICY: DISCRIMINATION, HARASSMENT, AND ABUSE

DEFINITIONS

1. The following terms have these meanings in this Policy:
 - a) “*Discipline Chair*” – An individual or individuals appointed by the Executive Director to be the first point-of-contact for all discipline and complaint matters reported to Curling Alberta in accordance with the *Discipline and Complaints Policy*
 - b) “*Individuals*” – All categories of membership defined in Curling Alberta’s Bylaws, as well as all individuals employed by, or engaged in activities with Curling Alberta including, but not limited to, volunteers, managers, administrators, committee members, and Directors and Officers of Curling Alberta
2. The following terms have the meanings as defined in the Curling Alberta’s *Code of Conduct and Ethics*:
 - a) Harassment
 - b) Discrimination
 - c) Workplace Harassment
 - d) Sexual Harassment
 - e) Workplace Violence
3. The term ‘Abuse’ has the meaning as defined in Curling Alberta’s *Abuse Policy*.

PURPOSE

4. Curling Alberta is committed to eliminating all instances of Discrimination, Harassment, Workplace Harassment, Workplace Violence, Sexual Harassment, and Abuse within its operations and activities. This Policy describes how Individuals can report instances of Discrimination, Harassment, Workplace Harassment, Workplace Violence, Sexual Harassment, and Abuse and how Curling Alberta will investigate those reports.

DETERMINATION AND DISCLOSURE

5. When a complaint is submitted in accordance with Curling Alberta’s *Discipline and Complaints Policy*, the Discipline Chair will determine if such complaint is related to an instance of Discrimination, Harassment, Workplace Harassment, Workplace Violence, Sexual Harassment, or Abuse.
6. Curling Alberta will adhere to all disclosure and reporting responsibilities required by the Minister of Sport and Persons with Disabilities and, if applicable, any government entity, local police force, or child protection agency.

INVESTIGATION

7. Complaints that are determined to contain an element of Discrimination, Harassment, Workplace Harassment, Workplace Violence, Sexual Harassment, and Abuse will continue to be addressed by the process(es) described in the *Discipline and Complaints Policy*. However, the Discipline Chair may also appoint an Investigator to investigate the allegations.

8. The Investigator must be an independent third-party skilled in investigating claims of harassment. The Investigator must not be in a conflict of interest situation and should have no connection to either party.
9. 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 and/or consult independent experts to determine whether legislation applies to the complaint.
10. 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) Complainant interviewed;
 - b) Witnesses interviewed;
 - c) Statement of facts (complainant's perspective) prepared by Investigator and acknowledged by Complainant;
 - d) Statement delivered to Respondent;
 - e) Respondent interviewed;
 - f) Witnesses interviewed; and
 - g) Statement of facts (respondent's perspective) prepared by Investigator and acknowledged by Respondent.

INVESTIGATOR'S REPORT

11. In accordance with the timelines determined by the Discipline Chair, who may modify the timelines as described in the *Discipline and Complaints Policy*, the Investigator will prepare and submit a Report.
12. The Investigator's Report should include a summary of evidence from the parties (including both statements of facts, if applicable) and recommendations from the Investigator of whether or not, on a balance of probabilities, an incident occurred that could be considered Discrimination, Harassment, Workplace Harassment, Workplace Violence, Sexual Harassment, or Abuse.
13. The Investigator's Report will be provided to the parties with the names and identifying details of any witnesses redacted. The provision of the Investigator's Report is conditional on the parties not distributing the Report to any third party without the written permission of Curling Alberta.
14. 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 to refer the matter to police. The Investigator will further inform Curling Alberta that the matter should be directed to the police.
15. The Investigator must also inform Curling Alberta of any findings of criminal activity. Curling Alberta may decide whether to report such findings to police but is required to inform police if there are findings related to the trafficking of doping drugs or materials, any sexual crime involving minors, fraud against Curling Alberta, or other offences where the lack of reporting would bring Curling Alberta's reputation into disrepute.

16. The Discipline Chair or the Discipline Panel, as applicable, shall consider the Investigator's Report, in addition to submissions from the parties, prior to deciding on the complaint.

REPRISAL AND RETALIATION

17. An individual who submits a complaint to Curling Alberta, or who gives evidence in an investigation, may not be subject to reprisal or retaliation from any individual or group. Should anyone who participates in the process face reprisal or retaliation, that individual will have cause to submit a complaint.

FALSE ALLEGATIONS

18. An individual who submits allegations that the Investigator determines to be false or without merit may be subject to a complaint pursuant to Curling Alberta's *Discipline and Complaints Policy*. In such circumstances, Curling Alberta or the individual against whom the false allegations were submitted may act as the Complainant.

CONFIDENTIALITY

19. The information obtained about an incident or complaint (including identifying information about any individuals involved) will remain confidential, unless disclosure is necessary for the purpose of investigating or taking corrective action or is otherwise required by law.
20. The Investigator will make every effort to preserve the confidentiality of the complainant, respondent, and any other party. However, Curling Alberta recognizes that maintaining anonymity of any party may be difficult for the Investigator during the investigation.

DISCIPLINE AND COMPLAINTS POLICY

DEFINITIONS

1. The following terms have these meanings in this Policy:
 - a) “*Case Manager*” – An individual appointed by the Executive Director to administer certain complaints under this *Discipline and Complaints Policy*. The Case Manager does not need to be a member of, or affiliated with Curling Alberta
 - b) “*Complainant*” – The Party making a complaint
 - c) “*Days*” – Days including weekends and holidays
 - d) “*Discipline Chair*” – An individual or individuals appointed by the Executive Director to be the first point-of-contact for all discipline and complaint matters reported to Curling Alberta
 - e) “*Individuals*” – All categories of membership defined in Curling Alberta’s Bylaws, as well as all individuals employed by, or engaged in activities with Curling Alberta including, but not limited to, athletes, coaches, convenors, officials, volunteers, managers, administrators, committee members, Directors and Officers of Curling Alberta, spectators, and parents/guardians of athletes
 - f) “*Respondent*” – The Party responding to the complaint

PURPOSE

2. Individuals are expected to fulfill certain responsibilities and obligations including, but not limited to, complying with Curling Alberta’s policies, Bylaws, rules and regulations, and *Code of Conduct and Ethics*. Non-compliance may result in sanctions pursuant to this Policy.

DISCIPLINE CHAIR

3. The Discipline Chair will be a Director of the Board, or an individual appointed by the Executive Director to handle the duties of the Discipline Chair. The Executive Director may choose to appoint three (3) individuals to serve as Discipline Chair and, in this case, decisions of the Discipline Chair will be by majority vote.
4. The Discipline Chair appointed to handle a complaint or incident must be unbiased and not in a conflict of interest situation.

APPLICATION OF THIS POLICY

5. This Policy applies to all Individuals.
6. This Policy applies to matters that may arise during Curling Alberta’s business, activities, and events including, but not limited to, competitions, practices, tryouts, training camps, travel associated with Curling Alberta’s activities, and any meetings.
7. This Policy also applies to Individuals’ conduct outside of Curling Alberta’s business, activities, and events when such conduct adversely affects relationships within Curling Alberta (and its work and sport environment), is detrimental to the image and reputation of Curling Alberta, or upon the acceptance of Curling Alberta. Applicability will be determined by Curling Alberta at its sole discretion.

8. This Policy does not prevent immediate discipline or sanction from being applied as reasonably required. Further discipline 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 will be for the duration of the competition, training, activity, or event only.
9. An employee of Curling Alberta who is a Respondent will be subject to appropriate disciplinary action in accordance with any of Curling Alberta's applicable policies, as well as the employee's Employment Agreement, if applicable. Violations may result in a warning, reprimand, restrictions, suspension, or other disciplinary actions up to and including termination of employment.

ALIGNMENT

10. Curling Alberta recognizes that Individuals may also be registered with Member Clubs. Curling Alberta requires that Member Clubs submit discipline decisions involving Individuals to Curling Alberta. Curling Alberta may, at its sole discretion, take further action.
11. If Curling Alberta decides to take further action upon becoming aware of an Individual who has been disciplined by a Member Club, the Individual will be the Respondent to a complaint initiated under the terms of this Policy. Curling Alberta may act as the Complainant if the original Complainant is unwilling or unavailable to participate in this process.
12. The Discipline Chair or Discipline Panel, as applicable, will review and consider the decision by the Member Club when deciding on the complaint in accordance with the terms of this Policy.

ADULT REPRESENTATIVE

13. 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.
14. Communication from the Discipline Chair or Case Manager, as applicable, must be directed to the minor's representative.
15. A minor is not required to attend an oral hearing, if held.

PROCESS

16. Any Individual may report an incident or complaint to the Executive Director in writing, within fourteen (14) days of the alleged incident, although this timeline can be waived or extended at the Executive Director's discretion.
17. Curling Alberta may, in its sole discretion, act as the Complainant and initiate the complaint process under the terms of this Policy. In such cases, Curling Alberta will identify an individual representative of the organization.
18. Upon receiving a report of an incident or a complaint, the Executive Director may, at their sole discretion and depending on the nature of the issue, appoint a Discipline Chair, who

will be responsible for following process #1, as described in Sections 21-27 below, or, alternatively, appoint a Case Manager, who will be responsible for following Section 28 and following below. The Executive Director's decision to appoint a Discipline Chair or a Case Manager is not subject to appeal.

19. When determining whether to appoint a Discipline Chair or a Case Manager, the Executive Director has the discretion to choose which process should be followed, and may use the following examples as a general guideline:

- a) Process #1 - the Complaint alleges the following incidents:
 - i. Disrespectful, abusive, racist, or sexist comments or behaviour
 - ii. Disrespectful conduct
 - iii. Minor incidents of violence (e.g., tripping, pushing, elbowing)
 - iv. Conduct contrary to the values of Curling Alberta
 - v. Non-compliance with Curling Alberta's policies, procedures, rules, or regulations
 - vi. Minor violations of Curling Alberta's *Code of Conduct and Ethics*
- b) Process #2 - the Complaint alleges the following incidents:
 - i. Repeated minor incidents
 - ii. Any incident of hazing
 - iii. Behaviour that constitutes harassment, sexual harassment, or sexual misconduct
 - iv. Major incidents of violence (e.g., fighting, attacking, sucker punching)
 - v. Pranks, jokes, or other activities that endanger the safety of others
 - vi. Conduct that intentionally interferes with a competition or with any athlete's preparation for a competition
 - vii. Conduct that intentionally damages Curling Alberta's image, credibility, or reputation
 - viii. Consistent disregard for Curling Alberta's bylaws, policies, rules, and regulations
 - ix. Major or repeated violations of Curling Alberta's *Code of Conduct and Ethics*
 - x. Intentionally damaging Curling Alberta's property or improperly handling Curling Alberta's monies
 - xi. Abusive use of alcohol, any use or possession of alcohol by minors, or use or possession of illicit drugs and narcotics
 - xii. A conviction for any *Criminal Code* offense
 - xiii. Any possession or use of banned performance enhancing drugs or methods

20. The Discipline Chair or Case Manager (as applicable), may determine that the alleged incident may contain an element of discrimination, harassment, workplace harassment, workplace violence, sexual harassment, or abuse. In this case, the Discipline Chair may appoint an Investigator in accordance with Curling Alberta's *Investigations Policy - Discrimination, Harassment, and Abuse* and Curling Alberta, and the Investigator, will have additional responsibilities as described in that Policy.

PROCESS #1: HANDLED BY DISCIPLINE CHAIR

Sanctions

21. Following the determination that the complaint or incident should be handled under Process #1, the Discipline Chair will review the submissions related to the complaint or incident and determine one or more of the following sanctions:
- a) Verbal or written reprimand

- b) Verbal or written apology
 - c) Service or other contribution to Curling Alberta
 - d) Removal of certain privileges
 - e) Suspension from certain teams, events, and/or activities
 - f) Suspension from all or some of Curling Alberta's activities for a designated period
 - g) Any other sanction considered appropriate for the offense
22. The Discipline Chair will inform the Respondent of the sanction, which will take effect immediately.
23. Records of all sanctions will be maintained by Curling Alberta.

Request for Reconsideration

24. The sanction may not be appealed until the completion of a request for reconsideration. However, the Respondent may contest the sanction by submitting a Request for Reconsideration within four (4) days of receiving the sanction. In the Request for Reconsideration, the Respondent must indicate:
- a) Why the sanction is inappropriate;
 - b) All evidence to support the Respondent's position; and
 - c) What penalty or sanction (if any) would be appropriate.
25. Upon receiving a Request for Reconsideration, the Discipline Chair may decide to accept or reject the Respondent's suggestion for an appropriate sanction.
26. Should the Discipline Chair accept the Respondent's suggestion for an appropriate sanction, that sanction will take effect immediately.
27. Should the Discipline Chair not accept the Respondent's suggestion for an appropriate sanction, the initial complaint or incident will be handled under Process #2 of this Policy.

PROCESS #2: HANDLED BY CASE MANAGER

Case Manager

28. Following the determination that the complaint or incident should be handled under Process #2, the Executive Director will appoint a Case Manager to oversee management and administration of the complaint or incident. The Case Manager should not be in a conflict of interest and should have expertise in dispute resolution matters. Such appointment is not appealable.
29. The Case Manager has a responsibility to:
- a) Determine whether the complaint is frivolous and/or within the jurisdiction of this Policy
 - b) Propose the use of Curling Alberta's *Dispute Resolution Policy*
 - c) Appoint the Discipline Panel, if necessary
 - d) Coordinate all administrative aspects and set timelines
 - e) Provide administrative assistance and logistical support to the Discipline Panel as required
 - f) Provide any other service or support that may be necessary to ensure a fair and timely proceeding

Procedures

30. If the Case Manager determines the complaint is:
 - a) Frivolous or outside the jurisdiction of this Policy, the complaint will be dismissed immediately
 - b) Not frivolous and within the jurisdiction of this Policy, the Case Manager will notify the Parties that the complaint is accepted and of the applicable next steps
31. The Case Manager's decision to accept or dismiss the complaint may not be appealed.
32. The Case Manager will establish and adhere to timelines that ensure procedural fairness and that the matter is heard in a timely fashion.
33. After notifying the Parties that the complaint has been accepted, the Case Manager may propose using Curling Alberta's *Dispute Resolution Policy* with the objective of resolving the dispute. If applicable, and if the dispute is not resolved, or if the parties refuse to use the *Dispute Resolution Policy*, the Case Manager will appoint a Discipline Panel, which shall consist of a single Arbitrator, to hear the complaint. In extraordinary circumstances, and 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.
34. 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
35. 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.

36. The hearing will proceed in any event, even if a Party chooses not to participate in the hearing.
37. If a decision may affect another party to the extent that the other party would have recourse to a complaint or an appeal in their own right, that party will become a Party to the current complaint and will be bound by the decision.
38. In fulfilling its duties, the Discipline Panel may obtain independent advice.

Decision

39. After hearing and/or reviewing 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, and Curling Alberta. 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

40. 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 Curling Alberta
 - d) Removal of certain privileges
 - e) Suspension from certain teams, events, and/or activities
 - f) Suspension from all or some of Curling Alberta's activities for a designated period
 - g) Payment of the cost of repairs for property damage
 - h) Suspension of funding from Curling Alberta or from other sources
 - i) Expulsion from Curling Alberta
 - j) Any other sanction considered appropriate for the offense
41. 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.
42. Records of all decisions will be maintained by Curling Alberta.

Appeals

43. The decision of the Discipline Panel may be appealed in accordance with Curling Alberta's *Appeal Policy*.

SUSPENSION PENDING A HEARING

44. The Executive Director may, at their sole discretion, determine that an alleged incident is of such seriousness as to warrant suspension of an Individual pending completion of a criminal process, the hearing, or a decision of the Discipline Panel.

CRIMINAL CONVICTIONS

45. An Individual's conviction for a *Criminal Code* offense will be deemed an infraction under this Policy and will result in expulsion from Curling Alberta. *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

46. The discipline and complaints process is confidential and involves only the Parties, the Case Manager, 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.

TIMELINES

47. 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 Discipline Panel may direct that these timelines be revised.

RECORDS AND DISTRIBUTION OF DECISIONS

48. Other individuals or organizations, including but not limited to, national sport organizations, provincial sport organizations, sport clubs, etc., may be advised of any decisions rendered in accordance with this Policy.

DISPUTE RESOLUTION POLICY

DEFINITIONS

1. The following term has this meaning in this Policy:
 - a) “*Individuals*” – All categories of membership defined in Curling Alberta's Bylaws, as well as all individuals employed by, or engaged in activities with Curling Alberta including, but not limited to, athletes, coaches, convenors, officials, volunteers, managers, administrators, committee members, and Directors and Officers of Curling Alberta.

PURPOSE

2. Curling Alberta supports the principles of Alternate Dispute Resolution (ADR) and is committed to the techniques of negotiation, facilitation, and mediation as effective ways to resolve disputes. Alternate Dispute Resolution also avoids the uncertainty, costs, and other negative effects associated with lengthy appeals or complaints, or with litigation.
3. Curling Alberta encourages all Individuals to communicate openly, collaborate, and use problem-solving and negotiation techniques to resolve their differences. Curling Alberta believes that negotiated settlements are usually preferable to outcomes resolved through other dispute resolution techniques. Negotiated resolutions to disputes with and among Individuals are strongly encouraged.

APPLICATION OF THIS POLICY

4. This Policy applies to all Individuals.
5. Opportunities for Alternate Dispute Resolution 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

6. The dispute will first be referred to Curling Alberta's Executive Director for review, with the objective of resolving the dispute via Alternate Dispute Resolution and/or mediation.
7. If all parties to a dispute agree to Alternate Dispute Resolution or mediation, the Executive Director may refer the alternate dispute resolution process to a resolution facilitator of the Sport Dispute Resolution Centre of Canada (SDRCC).
8. If all parties to a dispute agree to Alternate Dispute Resolution, a mediator or facilitator, acceptable to all parties, shall be appointed to mediate or facilitate the dispute.
9. The mediator or facilitator shall decide the format under which the dispute shall be mediated or facilitated and shall specify a deadline before which the parties must reach a negotiated decision.
10. Should a negotiated decision be reached, the decision shall be reported to and approved by Curling Alberta. 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 Curling Alberta's approval.

11. Should a negotiated decision not be reached by the deadline specified by the mediator or facilitator at the start of the process, or if the parties to the dispute do not agree to Alternate Dispute Resolution, the dispute shall be considered under the appropriate section of Curling Alberta's *Discipline and Complaints Policy* or *Appeal Policy*, as applicable.

FINAL AND BINDING

12. Any negotiated decision will be binding on the parties. Negotiated decisions may not be appealed.

APPEAL POLICY

DEFINITIONS

1. The following terms have these meanings in this Policy:
 - a) “*Appellant*” – The Party appealing a decision
 - b) “*Case Manager*” – An individual appointed by the Executive Director who may be any staff member, committee member, volunteer, Director, or an independent third party, to oversee this Appeal Policy. The Case Manager will have responsibilities that include, but are not limited to:
 - i. Ensuring procedural fairness;
 - ii. Respecting the applicable timelines; and
 - iii. Using decision making authority empowered by this Policy.
 - c) “*Respondent*” – The body whose decision is being appealed
 - d) “*Parties*” – The Appellant, Respondent, and any other Individuals affected by the appeal
 - e) “*Days*” – Days including weekends and holidays
 - f) “*Individuals*” – All categories of membership defined in Curling Alberta’s Bylaws, as well as all individuals employed by, or engaged in activities with Curling Alberta including, but not limited to, athletes, coaches, convenors, officials, volunteers, managers, administrators, committee members, Directors and Officers of Curling Alberta, spectators at events, and parents/guardians of athletes

PURPOSE

2. Curling Alberta is committed to providing an environment in which all Individuals involved with Curling Alberta are treated with respect and fairness. Curling Alberta provides Individuals with this *Appeal Policy* to enable fair, affordable, and expedient appeals of certain decisions made by Curling Alberta. Further, some decisions made by the process outlined in Curling Alberta’s *Discipline and Complaints Policy* may be appealed under this Policy.

SCOPE AND APPLICATION OF THIS POLICY

3. This Policy applies to all Individuals. Any Individual who is directly affected by a decision by Curling Alberta shall have the right to appeal that decision provided 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
 - 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 Curling Alberta

- e) Substance, content and establishment of team selection criteria
- f) Volunteer/coach appointments and the withdrawal or termination of those appointments
- g) Budgeting and budget implementation
- h) Curling Alberta's operational structure and committee appointments
- i) Decisions or discipline arising within the business, activities, or events organized by entities other than Curling Alberta (appeals of these decisions shall be dealt with pursuant to the policies of those other entities unless requested and accepted by Curling Alberta at its sole discretion)
- j) Commercial matters for which another appeals process exists under a contract or applicable law
- k) Any Board decision made pursuant to Alberta's *Fairness and Safety in Sport Act* and its Regulation, including any decision to adopt, interpret, implement, or apply Curling Alberta's Fairness and Safety in Sport Policy.
- l) Decisions made under this Policy

TIMING OF APPEAL

6. Individuals who wish to appeal a decision have seven (7) days from the date on which they received notice of the decision to submit, in writing to Curling Alberta, the following:
 - a) Notice of the intention to appeal
 - b) Contact information and status of the appellant
 - c) Name 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 one hundred dollars (\$100), 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 Case Manager and may not be appealed.

GROUND 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) Failed to consider relevant information or took into account irrelevant information in making the decision
 - e) Made a decision that was grossly unreasonable

9. 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.
10. Upon receiving the notice of the appeal, the fee, and all other information (outlined in the 'Timing of Appeal' section of this Policy), Curling Alberta and the Appellant may first attempt to resolve the dispute pursuant to Curling Alberta's *Dispute Resolution Policy* or through the Early Resolution Facilitation services offered by the Sport Dispute Resolution Centre of Canada (SDRCC).
11. Appeals resolved by mediation under Curling Alberta's *Dispute Resolution Policy* or through Early Resolution Facilitation at the SDRCC will result in the administration fee being refunded to the Appellant.

SCREENING OF APPEAL

12. Should the appeal not be resolved by using the *Dispute Resolution Policy* or through resolution facilitation at the SDRCC, Curling Alberta will appoint an independent Case Manager (who must not be in a conflict of interest) who has the following responsibilities:
 - a) Determine if the appeal falls under the scope of this Policy
 - b) Determine if the appeal was submitted in a timely manner
 - c) Decide whether there are sufficient grounds for the appeal
13. If the appeal is denied 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 Case Manager is satisfied there are sufficient grounds for an appeal, the Case Manager will appoint an Appeals Panel which shall consist of a single Arbitrator, to hear the appeal. In extraordinary circumstances, and at the discretion of the Case Manager, a Panel of three persons may be appointed to hear the appeal. In this event, the Case Manager will appoint one of the Panel's members to serve as the Chair.

PROCEDURE FOR APPEAL HEARING

15. The Case Manager shall notify the Parties that the appeal will be heard. The Case Manager shall then decide the format under which the appeal will be heard. This decision is at the sole discretion of the Case Manager and may not be appealed.
16. If a Party chooses not to participate in the hearing, the hearing will proceed in any event.
17. 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 Case Manager and the Panel deem appropriate in the circumstances, provided that:
 - a) The hearing will be held within a timeline determined by the Case Manager
 - b) The Parties will be given reasonable notice of the day, time and place of the hearing

- 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 the hearing
 - f) The Panel may allow as evidence at the hearing any oral evidence and document or thing relevant to the subject matter of the appeal, but may exclude such evidence that is unduly repetitious and shall place such weight on the evidence as it deems appropriate
 - 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 a 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
18. In fulfilling its duties, the Panel may obtain independent advice.

APPEAL DECISION

19. The Panel shall issue its decision, in writing and with reasons, within fourteen (14) 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
 - c) Uphold the appeal and vary the decision
20. The Panel's written decision, with reasons, will be distributed to all Parties, the Case Manager, and Curling Alberta. 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.
21. The Panel's decision may be appealed by any of the Parties to the SDRCC in accordance with the Canadian Sport Dispute Resolution Code.

TIMELINES

22. 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 Case Manager and/or Panel may direct that these timelines be revised.

CONFIDENTIALITY

23. The appeals process is confidential and involves only the Parties, the Case 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.

FINAL AND BINDING

24. No action or legal proceeding will be commenced against Curling Alberta or Individuals in respect of a dispute, unless Curling Alberta has refused or failed to provide or abide by the dispute resolution process and/or appeal process as set out in Curling Alberta's governing documents.

SDRCC

25. By agreement between the Parties, the internal appeal process may be bypassed and the appeal may be heard directly by the SDRCC.

WHISTLEBLOWER POLICY

DEFINITIONS

1. The following terms have these meanings in this Policy:
 - a) *Director* – An individual appointed or elected to Curling Alberta's Board of Directors
 - b) *Worker* – An individual who has signed an Employment Agreement or Contractor Agreement with Curling Alberta

PURPOSE

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

APPLICATION

3. This Policy only applies to Workers who observe or experience incidents of wrongdoing committed by Directors or by other Workers.
4. Incidents of wrongdoing or misconduct observed or experienced by participants, volunteers, spectators, parents of participants, or other individuals not employed or contracted by Curling Alberta can be reported under the terms of Curling Alberta's *Discipline and Complaints Policy* and/or reported to Curling Alberta's Board or Executive Director to be handled under the terms of the individual Worker's Employment Agreement or Contractor Agreement, as applicable, and/or any other relevant and applicable Curling Alberta policy.
5. Matters reported under the terms of this Policy may be referred to be heard under Curling Alberta's *Discipline and Complaints Policy*, at the discretion of the Compliance Officer.

WRONGDOING

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

PLEDGE

7. Curling Alberta pledges 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 under the terms of this Policy.

8. Any individual affiliated with Curling Alberta who breaks this Pledge will be subject to disciplinary action.

REPORTING WRONGDOING

9. 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 or Workers (if any) 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 Worker submitting the report (if applicable).

AUTHORITY

10. Curling Alberta has appointed the following Compliance Officer to receive reports made under this Policy:

Roger Gunn
Win Win HR Solutions Inc.
roger@winwinhrsolutions.com

11. After receiving the report, the Compliance Officer has the responsibility to:
 - a) Assure the Worker of Curling Alberta's Pledge
 - b) Connect the Worker 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 Curling Alberta 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 Curling Alberta's *Whistleblower Policy* applies or if the matter should be handled under Curling Alberta's *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 Curling Alberta's Chairperson and/or Executive Director should or can be notified of the report
 - h) Begin an investigation

ALTERNATE LIAISON

12. 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 Curling Alberta 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:

Steven J. Indig, LLB
Sport Law & Strategy Group
SJI@sportlaw.ca

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

14. 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

15. If the Compliance Officer determines that an investigation should be launched, the Compliance Officer may decide to contract an external investigator. In such cases, Curling Alberta's Executive Director and/or Chairperson 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. Curling Alberta's Executive Director and/or Chairperson may not unreasonably refuse the decision to contract an external investigator
16. An investigation launched by the Compliance Officer or by an external investigator should generally take the following form:
 - a) Followup interview with the Worker who submitted the report
 - 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(s) against whom the report was submitted
 - e) Interview with the supervisor(s) of the Director(s) or Worker(s) against whom the report was submitted
17. In all stages of the investigation, the investigator will take every precaution to protect the identity of the Worker who submitted the report and/or the specific nature of the report itself. However, Curling Alberta recognizes that there are some instances where the nature of the report and/or the identity of the Worker who submitted the report will or may be inadvertently deduced by individuals participating in the investigation.
18. The investigator will prepare an Investigator's Report – omitting names whenever possible and striving to ensure confidentiality – that will be submitted to Curling Alberta's Chairperson and/or Executive Director for review and action.

DECISION

19. Within fourteen (14) days after receiving the Investigator's Report, Curling Alberta's Chairperson and/or Executive Director 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 Curling Alberta's Bylaws, provincial employment legislation, any relevant and applicable Curling Alberta policy, and/or the Worker's Employment Agreement or Contractor Agreement.
20. The corrective action, if any, will be communicated to the investigator who will then inform the Worker who submitted the report.

21. Decisions made under the terms of this Policy may be appealed under the terms of Curling Alberta's *Appeal Policy* provided that:
 - a) If the Worker who submitted the initial report is appealing the decision, the Worker 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 Worker or Director understands that the identity of the Worker who submitted the report will not be revealed and that Curling Alberta will act as the Respondent

CONFIDENTIALITY

22. Confidentiality at all stages of the procedures outlined in this Policy – from the initial report to the final decision – is assured for all individuals (the Worker, the Worker(s) against whom the report is submitted, and the individuals interviewed during the investigation). An individual who intentionally breaches the confidentiality clause of this Policy will be subject to disciplinary action.

EVENT DISCIPLINE PROCEDURE

**** This Event Discipline Procedure does not supersede or replace Curling Alberta's Discipline and Complaints Policy ****

DEFINITIONS

1. The following terms have these meanings in this Policy:
 - a) *"Event"* – An event sanctioned and operated by Curling Alberta
 - b) *"Individuals"* – All categories of membership defined in Curling Alberta's Bylaws, as well as all individuals employed by, or engaged in activities with Curling Alberta including, but not limited to, athletes, coaches, convenors, officials, volunteers, managers, administrators, committee members, Directors and Officers of Curling Alberta, and parents/guardians of athletes.

PURPOSE

2. Curling Alberta is 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

3. This Procedure will be applied to all Curling Alberta-sanctioned and operated Events, but is particularly relevant to games which are televised or streamed. Changes to this Procedure must also be outlined in the event Competition Guide, when and if applicable.
4. If the Event is being sanctioned by an organization other than Curling Alberta, the Event Discipline Procedure of the sanctioning organization will replace this procedure. Incidents involving Individuals connected with Curling Alberta (such as athletes, coaches, members, and Directors and Officers) must still be reported to Curling Alberta to be addressed under Curling Alberta's *Discipline and Complaints Policy*, if necessary.
5. This Procedure does not replace or supersede Curling Alberta's *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 and operated by Curling Alberta, the procedure for taking immediate, informal, or corrective action in the event of a possible violation of Curling Alberta's *Code of Conduct and Ethics*.

MISCONDUCT DURING EVENTS

6. Incidents that violate or potentially violate Curling Alberta's *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 Umpire or Curling Alberta staff member) responsible at the Event.
7. The designated person at the Event shall use the following procedure to address the incident that violated or potentially violated Curling Alberta's *Code of Conduct and Ethics*:

- a) Notify the involved parties that there has been an incident that violated or potentially violated Curling Alberta's *Code of Conduct and Ethics*.
- b) If the violation occurred during a competition, interviews may be held with the Umpires who officiated or observed the competition and with the coaches and/or skips of each team when necessary and appropriate.
- c) The guidelines below may be utilized to assess fines (Curling Alberta reserves the right to assess fines which fall outside of the guidelines depending on circumstance):
 - i. On-Ice Conduct
 - Use of inappropriate language.
 - Making an obscene gesture deemed inappropriate by an Official.
 - Being abusive to anyone involved with the event.
 - Refusing to talk to an accredited member of the media.
 - Refusing to wear a RF microphone.
 - Refusing to cooperate with the televising network.
 - Dress code violation (including the use of unapproved cresting on clothing or equipment)
 - a. 1st Offence \$150 - \$500
 - b. 2nd Offence \$500 - \$1,000
 - c. 3rd Offence Fine up to \$1,000 and suspension
 - Conceding a game before the time frame designated by Curling Alberta without permission. Up to \$2,000 per team for each offence during a game which is broadcasted by any means (i.e. televised or streamed). Up to \$1,000 per team for each offence during a game which is not broadcasted.
 - Refusing to take a directive given by a Curling Alberta official:
 - a. 1st Offence \$300 - \$600
 - b. 2nd Offence \$600 - \$1,000
 - c. 3rd Offence up to \$1,000 and suspension
 - ii. Off-Ice Activity:
 - Any conduct considered inappropriate by Curling Alberta.
 - a. 1st Offence \$300 - \$600
 - b. 2nd Offence \$600 - \$1,000
 - c. 3rd Offence up to \$1,000 and suspension
8. The Chief Umpire and/or the Curling Alberta staff member do not have the authority to determine a suspension that exceeds the duration of the Event. A full written report of the incident shall be submitted to Curling Alberta following the conclusion of the Event. Further discipline may then be applied in accordance with Curling Alberta's *Discipline and Complaints Policy* if necessary.
9. Decisions made in the scope of this Procedure may not be appealed.
10. This Procedure does not prohibit other Individuals from reporting the same incident to Curling Alberta to be addressed as a formal complaint pursuant to Curling Alberta's *Discipline and Complaints Policy*.
11. Curling Alberta shall record and track all reported incidents.

MATCH MANIPULATION POLICY

PART A – OVERVIEW AND JURISDICTION

Executive Summary

The manipulation of sports competition threatens the integrity of sport. The involvement of organized crime in the manipulation of sports is a serious and increasing concern. In response, the International Olympic Committee (IOC) created the Olympic Movement Code on the Prevention of Manipulation of Competitions (IOC Code). The IOC Code is the international framework for a harmonized effort to eliminate the manipulation of sports competitions.

The World Curling Federation recognizes the threat to the integrity of curling posed by the manipulation of sports competitions. This is contrary to the 'Spirit of Curling' which is highlighted in the Rules of Curling. The Members of the World Curling Federation agreed to follow and be bound by the IOC Code at the 2017 Annual General Assembly.

This Match Manipulation Policy (the "Policy") provides the necessary tools and resources to prevent, deter and detect the manipulation of sports competitions in Alberta to protect the integrity of the sport of curling in Alberta.

Section 1.0 Introduction

Curling Alberta maintains a longstanding commitment to fair and ethical sport. The adoption and implementation of this Policy by Curling Alberta will help ensure that the Alberta curling system is prepared to pre-emptively deter and robustly respond to corrupt attacks on the integrity of the sport of curling.

This Policy establishes rules and a consistent scheme of enforcement and sanctions applicable to all Organizational Participants who are subject to the Policy.

All terms within this Policy that are capitalized are defined in the Definitions section below.

Section 2.0 Definitions

Benefit: the direct or indirect receipt of money or other Consideration, including, but not limited to, bribes, gains, gifts, and other advantages including, without limitation, preferential treatment, winnings and/or potential winnings because of a Wager. This does not include official prize money, appearance fees or payments made under sponsorship or other contracts.

Bet or Betting: any form of speculation involving a stake of monetary value in the expectation of a prize of monetary value, subject to a future and uncertain occurrence related to a Curling Competition.

Consideration: anything of value, except for money.

Corruption Offence: any conduct by an Organizational Participant to improperly impact the outcome of a Curling Competition.

Curling Competition: any sports competition, tournament, game, match, or event, organized, recognized, or sanctioned by a Curling Organization.

Curling Organization: Collectively Curling Alberta, an Affiliated or Director Member (defined in the Curling Alberta By-laws), or its affiliated curling clubs.

Organizational Participants – Refers any individual who is employed by, contracted by, registered with, associated with or otherwise engaged in activities with a Curling Organization, including, but not limited to:

- a. Athletes;
- b. Coaches;
- c. Agents;
- d. Officials;
- e. Volunteers;
- f. Managers;
- g. Administrators;
- h. Committee members;
- i. Parents and guardians of minor athletes;
- j. Trainers;
- k. IST Support;
- l. Contractors; and
- m. Employees, Directors, Officers, and Governors.

Information in the Public Domain: information which has been published or is a matter of public record or can be readily acquired by a member of the public and/or information which has been disclosed according to the rules or regulations of a Curling Competition.

Inside Information: information about the likely participation or likely performance of an athlete in a Curling Competition or concerning the conditions, status, outcome, or any other aspect of a Curling Competition which is known by an Organizational Participant by virtue of their position in relation to a Curling Organization or a Curling Competition and is not Information in the Public Domain or accessible to the public.

Manipulation of a Curling Competition: an intentional arrangement, act or omission aimed at an improper alteration of the result, the course of or any aspect of a Curling Competition to remove all or part of the unpredictable nature of the competition with a view to obtaining a Benefit for the Organizational Participant or for others.

Sport Organization: any of the following entities: a national sport governing body; a national multi-sport organization; a National Sport Centre; a National Sport Institute; and any other sport organization in Canada.

Wager: A Bet involving money or Consideration or any other form of financial speculation.

Section 3.0 Jurisdiction

3.1 Application to Curling Alberta

Curling Alberta is committed to protecting the integrity of sport of curling in Alberta. This Policy is applicable to all Organizational Participants.

This Policy applies to the conduct of all Organizational Participants during the business, activities, and Events of a Curling Organization 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, and any meetings.

This Policy also applies to the conduct of all Organizational Participants outside of the business, activities, and Events of a Curling Organization when such conduct adversely affects a Curling Organization's relationships (and the work and sport environment) or is detrimental to the image and reputation of Curling Alberta or a Curling Organization. Such applicability will be determined by Curling Alberta, at its sole discretion.

This Policy applies to Organizational Participants active in the sport of curling or who have retired from the sport where any claim regarding a potential breach of this Policy occurred when the Organizational Participant was active in the sport.

RULES

RULE 1 APPLICATION

1.1 Application

These rules shall apply to all Organizational Participants.

Organizational Participants are deemed to know they are subject to this Policy and have accepted and agreed to be bound by this Policy.

It is the responsibility of every Organizational Participant to understand their obligations under this Policy.

1.2 Other Applicable Laws or Regulations

Organizational Participants should be aware that the conduct prohibited in the Policy may also constitute a criminal offence and/or a breach of other applicable laws or regulations.

Organizational Participants must comply with all applicable laws and regulations.

RULE 2 CORRUPTION OFFENCES

Organizational Participants may not, in any manner, attempt to directly or indirectly control, impact, or influence the outcome or any other aspect of a Curling Competition in an improper manner.

Allegations regarding a possible Corruption Offence shall be dealt with as a Complaint under Curling Alberta's *Discipline and Complaints Policy*.

Doing so is a Corruption Offence under the Policy.

The following are examples of Corruption Offences:

2.1 Betting

21.1 Betting by the Organizational Participant in relation:

- a) to a Curling Competition in which the Organizational Participant is directly taking part or when the Organizational Participant has access to information unavailable to the public that could provide an unfair advantage; or
- b) to any event of a multi sport event that includes a Curling Competition in which the Organizational Participant is taking part or has access to information unavailable to the public that could provide an unfair advantage; or
- c) to any Curling Competition in which the Organizational Participant has influence over the field of play; or

21.2 No Organizational Participant shall, directly or indirectly, solicit, encourage, or facilitate any other person to Wager on the outcome or any other aspect of any Curling Competition on the Organizational Participant's behalf.

2.2 Bribery

22.1 No Organizational Participant shall, directly or indirectly, solicit or accept any Benefit for the purpose of directly or indirectly influencing the outcome of a Curling Competition.

22.2 No Organizational Participant shall, directly or indirectly, solicit or accept any Benefit with the intention of influencing an athlete's best efforts in any Curling Competition.

22.3 No Organizational Participant shall, directly or indirectly, offer or provide any

Benefit to any other Organizational Participant with the intention of influencing an athlete's performance in any Curling Competition.

23 Manipulation of a Curling Competition

231 No Organizational Participant shall engage in the Manipulation of a Curling Competition, directly or indirectly, using any means, by attempting to control, impact or influence the outcome or any other aspect of a Curling Competition.

232 No Organizational Participant shall, directly or indirectly, solicit or influence any athlete to not use their best efforts in any Curling Competition.

233 No Organizational Participant shall, directly or indirectly, solicit or request any other person to attempt to control, impact or influence the outcome or any other aspect of a Curling Competition.

2.3.4. No Organizational Participant shall provide, request, receive, seek, or accept a Benefit related to the Manipulation of a Curling Competition

2.5 Inside Information

251 Using Inside Information for the purposes of Betting or for any form of Manipulation of a Curling Competition whether by the Organizational Participant or via another person and/or entity. This includes disclosing Inside Information where the Organizational Participant knew or should have known that such disclosure might lead to the information being used for the purposes of Betting or for any form of Manipulation of a Curling Competition.

2.5.3 Giving, offering and/or receiving a Benefit for providing Inside Information regardless of whether any Inside Information is actually provided.

2.5.4 There is no restriction on using Information in the Public Domain and the use of such information on its own is not a Corruption Offence.

2.6 Failure to Cooperate

261 An Organizational Participant may not obstruct or delay any investigation by Curling Alberta in relation to a possible Corruption Offence. This includes concealing, tampering with, or destroying any documentation or other information that may be relevant to the investigation. Doing so may result in additional disciplinary action. Organizational Participants are required to cooperate with any Curling Organization investigation.

2.7 Deemed Corruption Offence

271 Any aid, abetment or an attempt by an Organizational Participant that could result in a Corruption Offence shall be treated as if a Corruption Offence had been committed, whether a Corruption Offence occurred and/or whether the Corruption Offence was committed deliberately or negligently.

272 An Organizational Participant shall be responsible for any Corruption Offence committed by any other party if the Organizational Participant, either:

- a) had knowledge of a Corruption Offence and failed to report to Curling Alberta; or
- b) assisted in the commission of a Corruption Offence.

Curling Alberta has the right to assert that an Organizational Participant breached their obligations in the Policy. If allegations of deemed Corruption Offences are proven by Curling Alberta at a hearing under its Discipline and Complaints Policy, the Discipline Committee may impose sanctions on an Organizational Participant

to the same extent as if an Organizational Participant had committed the Corruption Offence.

RULE 3 REPORTING OBLIGATIONS

3.1 Direct Knowledge

An Organizational Participant has an obligation to report a possible Corruption Offence as soon as possible. This includes if an Organizational Participant is approached by any person who offers or provides any type of Benefit to that Organizational Participant to:

- a) influence the outcome or any other aspect of any Curling Competition; or
- b) to provide Inside Information.

3.2 Indirect Knowledge or Suspicion

In the event the Organizational Participant knows, suspects, or becomes aware of any incident, fact, or matter (or of which they ought to have been reasonably aware) that any other Organizational Participant or other Organizational Participant has committed a Corruption Offence, including approaches or invitations received by another Organizational Participant to engage in conduct that could amount to a Corruption Offence, the Organizational Participant must report this knowledge or suspicion to Curling Alberta as soon as possible.

3.3 Continuing Obligation

An Organizational Participant has a continuing obligation to report any new knowledge or suspicion regarding any Corruption Offence even if the Organizational Participant's prior knowledge or suspicion has already been reported.

3.4 Reporting Process

Any person may report a possible Corruption Offence to Curling Alberta according to Curling Alberta's *Discipline and Complaints Policy*.

Curling Alberta may, in its sole discretion, initiate the complaint process and act as the Complainant.

RULE 4 ADDITIONAL MATTERS

4.1 Matters Not Relevant

For the determination of whether a Corruption Offence has been committed, the following are not relevant:

- a) whether the Organizational Participant is taking part in the Curling Competition concerned;
- b) whether the outcome or the aspect of the Curling Competition on which the Bet was made or intended to be made was favourable;
- c) whether or not any Benefit was actually given or received;
- d) the nature or outcome of the Bet;
- e) whether the Organizational Participant's effort or performance in the Curling Competition concerned were (or could be expected to be) affected by the acts or omission in question;
- f) whether the result of the Curling Competition concerned was (or could be expected to be) affected by the acts or omission in question; and
- g) whether the manipulation included a violation of a technical rule of the respective Sport Organization.

4.2 Offer or Solicitation

For a Corruption Offence to be committed, it is sufficient that an offer or solicitation was made, regardless of whether any Benefit was actually paid or received.

4.3 Evidence of Effort

Evidence of an athlete's lack of efforts or poor performance during a Curling Competition may be offered to support allegations that an Organizational Participant committed a Corruption Offence, but the absence of such evidence shall not preclude an Organizational Participant from being sanctioned for a Corruption Offence.

4.4 Valid Defence

A valid defence may be made to a charge of a Corruption Offence if the Organizational Participant alleged to have committed the Corruption Offence:

- a) reported such conduct to Curling Alberta immediately or as soon as reasonably possible, and
- b) demonstrates that such conduct was the result of imminent peril or danger, that the Organizational Participant had no reasonable alternative other than to conduct the Corruption Offence, and that the conduct was proportional to the peril or danger avoided.

RULE 5 INVESTIGATION

5.1 Right to Investigate

After receiving a report of a possible Corruption Offence or after initiating the complaint process, Curling Alberta may order an investigation into the circumstances.

RULE 6 PROVISIONAL MEASURES

6.1 Provisional Measures

Curling Alberta may in its discretion impose reasonable and proportionate provisional measures, including a provisional suspension, on an Organizational Participant where there is a particular ongoing risk to the sport under section 44 of Curling Alberta's *Discipline and Complaints Policy*.

RULE 7 Process

Once a report is submitted, Curling Alberta will follow the process as set out in the *Discipline and Complaints Policy*, except where specifically modified by this Policy. In the event of conflict between these policies, this Policy shall apply.

RULE 8 SANCTIONS

8.1 Sanctions

The Panel appointed per the *Discipline and Complaints Policy* will determine sanctions, if any.

8.2 Reporting to Other Authorities

Curling Alberta may report Corruption Offences that also violate other laws and regulations to the competent administrative, professional, or judicial authorities.

8.3 Subsequent Corruption Offence

If any Organizational Participant commits a Corruption Offence during a period of ineligibility, it shall be treated as a separate Corruption Offence under the Policy, but the

initial Corruption Offence will be considered when determining sanctions.

8.4 Breach of Sanction

The Panel appointed per the *Discipline and Complaints Policy* will determine the consequences of an Organizational Participant breaching sanctions.

RULE 9 APPEALS

9.1 Decisions Subject to Appeal

The appeal of a Discipline Panel decision must be made according to the terms of Curling Alberta's *Appeal Policy*.

RULE 10 MUTUAL RECOGNITION

10.1 Recognition of Decisions

Curling Alberta shall recognize and respect the final decisions made by another sporting body or a court of competent jurisdiction in matters substantially pertaining to the subject matters of the Policy.

Curling Alberta may inform other Organizational Participants or organizations, including but not limited to, national sport organizations, provincial sport organizations, sport clubs, etc., of any decisions rendered in accordance with this Policy

RULE 11 GENERAL

11.4 Waiver of Rights

Except as otherwise stated herein, failure to exercise or enforce any right conferred by the Policy shall not be deemed to be a waiver of any such right nor operate to bar the exercise or enforcement of any other right on any other occasion.

11.5 Time Periods

Unless otherwise specified, time periods in the Policy are total consecutive days irrespective of weekends or holidays. When a deadline falls on a weekend or statutory holiday, the next business day shall be the deadline for the purpose of the Policy.

11.6 Effective Date

The Policy is applicable prospectively to Corruption Offences occurring on or after the date that the Policy becomes effective. The Policy comes into full force and effect on January 20, 2025.

The Rules in the Policy shall not apply retroactively to any matters pending before the Effective Date.

SOCIAL MEDIA POLICY

DEFINITIONS

1. The following terms have these meanings in this Policy:
 - a) “*Social media*” – The catch-all term that is applied broadly to new computer-mediated communication media including, but not limited to blogs, YouTube, Facebook, Instagram, Tumblr, Snapchat, and Twitter.
 - b) “*Individuals*” – Individuals employed by, or engaged in activities with Curling Alberta including, but not limited to, athletes, coaches, convenors, referees, officials, volunteers, managers, administrators, committee members, medical and paramedical personnel, and Directors and Officers of Curling Alberta
 - c) “*Discipline Chair or Case Manager*” – The person(s) appointed by Curling Alberta to oversee management and administration of complaints, as applicable.

PREAMBLE

2. Curling Alberta is aware that Individual interaction and communication occurs frequently on social media. Curling Alberta cautions Individuals that any conduct falling short of the standard of behaviour required by Curling Alberta’s *Code of Conduct and Ethics* will be subject to the disciplinary sanctions identified within Curling Alberta’s *Discipline and Complaints Policy*.

APPLICATION OF THIS POLICY

3. This Policy applies to all Individuals as defined in the Definitions.

CONDUCT AND BEHAVIOUR

4. In accordance with Curling Alberta’s *Discipline and Complaints Policy* and *Code of Conduct and Ethics*, the following social media conduct may be considered minor or major infractions at the discretion of the Discipline Chair or Case Manager:
 - a) Posting a disrespectful, hateful, harmful, disparaging, insulting, or otherwise negative comment on a social medium that is directed at an Individual, at Curling Alberta, or at other individuals connected with Curling Alberta
 - 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 Curling Alberta, or at other individuals connected with Curling Alberta
 - 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 Curling Alberta, its stakeholders, or its reputation
 - d) Inappropriate personal or sexual relationships between Individuals who have a power imbalance in their interactions, such as between athletes and coaches, Directors and staff, officials and athletes, etc.
 - e) Any instance of cyber-bullying or cyber-harassment between one Individual and another Individual (including a teammate, coach, opponent, volunteer, or official), 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: regular insults, negative comments, vexatious behavior, pranks or jokes,

threats, posing as another person, spreading rumors or lies, or other harmful behavior.

5. All conduct and behavior occurring on social media may be subject to Curling Alberta's *Discipline and Complaints Policy* at the discretion of the Discipline Chair or Case Manager.

INDIVIDUALS RESPONSIBILITIES

6. Individuals acknowledge that their social media activity may be viewed by anyone, including Curling Alberta.
7. If Curling Alberta 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 Curling Alberta to cease this engagement.
8. When using social media, an Individual must model appropriate behavior befitting the Individual's role and status in connection with Curling Alberta.
9. Removing content from social media after it has been posted (either publicly or privately) does not excuse the Individual from being subject to Curling Alberta's *Discipline and Complaints Policy*.
10. An individual who believes that an Individual's social media activity is inappropriate or may violate Curling Alberta's policies and procedures should report the matter to Curling Alberta in the manner outlined by Curling Alberta's *Discipline and Complaints Policy*.

CONFIDENTIALITY POLICY

POLICY STATEMENT

Curling Alberta (CA) is committed to protecting its proprietary confidential information. Curling Alberta will comply with relevant legislation. The purpose of this Policy is to ensure the protection of Confidential Information that is proprietary to the Curling Alberta.

DEFINITIONS

- a) *“CA Representatives”*: all individuals employed by, or engaged in activities with, the CA including, but not limited to, athletes, coaches, officials, volunteers, administrators, contract personnel, committee members, and Directors and officers of CA (hereinafter *“CA Representatives”*)
- b) *“Confidential Information”*: The term *“Confidential Information”* includes, but is not limited to, the following:
 - a. Personal information of Curling Alberta Representatives including:
 - i. Home address
 - ii. Email address
 - iii. Personal phone numbers
 - iv. Date of birth
 - v. Birth registration documents
 - vi. Financial information
 - vii. Medical history
 - viii. Police and background Checks

POLICY

This Policy applies to all categories of membership within the CA's Bylaws as well as all individuals employed by, or engaged in activities with, the CA. Persons affected by this Policy include, but are not limited to, athletes, coaches, officials, volunteers, administrators, contract personnel, committee members, Directors and officers of the CA (hereinafter *“CA Representatives”*).

Confidential Information does not include the following: name, title, business address, work telephone number, or any other information widely available or posted publicly. CA Representatives voluntarily publishing or consenting to the publication of basic personal information in a public forum (such as the listing of an email address on a website) forfeit the expectation of confidentiality for that personal information for as long as it is available publicly. Directors, Staff and Committee members will review and sign a confidentiality agreement on an annual basis.

Responsibilities

CA Representatives will not, either during the period of their involvement/employment with the CA or any time thereafter, disclose to any person or organization any Confidential Information acquired during their period of involvement/employment, unless expressly authorized to do so.

CA Representatives will not publish, communicate, divulge, or disclose to any unauthorized person, firm, corporation, or third party any Confidential Information without the express written consent of CA or the individual where appropriate.

COMMUNICATION POLICY

PURPOSE:

To support the organization's values of Fearless Leadership, Trusted Professionals, Part of a Community and Excellence by Design and using our Governance Charter for guidance, the following principles will be followed:

- To provide timely and relevant information to our members
- To communicate often
- To address concerns in a timely manner
- To respect the different roles within the organization

ROLES AND RESPONSIBILITIES

PRESIDENT

The President is the spokesperson for Curling Alberta and will be responsible for communication on items related to the following:

- Board issues
- Strategic decisions
- Organizational matters that are out of the scope of the Executive Director
- Matters that are politically sensitive and could harm the brand and reputation of Curling Alberta

The President will identify a designate when appropriate

EXECUTIVE DIRECTOR

The Executive Director will communicate on all operational issues and other items at the request of the Board of Curling

The Executive Director will identify a designate when appropriate

EXECUTIVE COMMITTEE

To act as a sounding board and in an advisory capacity when determining the most approach to communication matters.

REVIEW

This policy will be reviewed on an annual basis

OTHER POLICY REFERENCES

Code of Conduct and Ethics
Social Media

CA Representatives will not use, reproduce, or distribute Confidential Information without the express written consent of CA or the individual where appropriate.

All files and written materials relating to Confidential Information will remain the property of the CA and, upon termination of involvement/employment with CA or upon request of CA, the CA Representative will immediately return all written or tangible Confidential Information, as well as copies and reproductions, and any other media containing Confidential Information.

CA will review FOIP and other relevant legislation to ensure compliance.

INTELLECTUAL PROPERTY

Copyright and any other intellectual property rights for all written material (including material in electronic format or posted on a website) and other works produced in connection with employment or involvement with the CA will be owned solely by the CA, which shall have the right to use, reproduce, or distribute such material and works, in whole or in part, for any purpose it wishes. The CA may grant permission for others to use its intellectual property.

ENFORCEMENT

A breach of any provision in this Policy may be subject to legal recourse, termination of the employment or volunteer position, or sanctions.

PRIVACY POLICY

Curling Alberta is committed to safeguarding the personal information entrusted to us by our members. We manage your personal information in accordance with Alberta's Personal Information Protection Act (PIPA) and other laws such as the Personal Information and Protection of Electronic Documents Act (PIPEDA), when applicable. Personal information collection is necessary to ensure the ongoing provision of services to our member facilities and their curlers.

This Privacy Policy will detail Curling Alberta's practices and principles that will be followed to protect the personal data of our membership.

SCOPE OF THE POLICY

This Privacy Policy applies to Curling Alberta and to any person providing services on our behalf. A copy of this policy is published on the organization's website and provided to any member or curler on request. Some key terms used in the Privacy Policy are defined below:

Personal Information – this means information identifiable to any person, including, but not limited to, information that relates to a person's age, birth date, sex, home address, telephone number/s, medical information, etc. In addition, personal information includes membership details such as role, club affiliation, criminal record checks, and other demographic information.

Privacy Officer – Curling Alberta will appoint a member of staff to act as the Privacy Officer. This person will be responsible to ensure that Curling Alberta complies with this policy and all applicable legislation.

COLLECTION OF PERSONAL INFORMATION

Unless the reason for collecting personal information is obvious and the individual provides their personal data for that purpose, Curling Alberta will communicate the purposes for which data is being collected either orally or in writing, before or at the time of collection. Curling Alberta may collect data directly from curlers or indirectly from a member curling club with consent or as authorized by law.

Curling Alberta will collect only the personal data necessary to fulfil the following purposes:

- To ensure the health and safety of members, participants, employees and the general public.
- To confirm the eligibility of members to participate in Curling Alberta events including its competitions, camps, clinics and meetings.
- To comply with Curling Alberta's legal obligations.
- To inform curlers of Curling Alberta programs, benefits, services, and fundraising opportunities (e.g.- online raffles)
- To deliver requested products or services
- To maintain participant and member lists and to administer related benefits
- To register participants in Curling Alberta courses, programs, competitions, or events
- To maintain emergency contact information for program participants
- To fulfill grant reporting requirements
- To track participation, guide planning, and inform advocacy efforts to demonstrate social value and community impact
- Newsletter distribution
- To provide to Curling Canada for use pursuant to Curling Canada's Privacy Policy

USING AND DISCLOSING PERSONAL INFORMATION

Curling Alberta will only use or disclose information for the purposes identified above or for a purpose identified at the time of collection.

We will not use or disclose an individual's information for any additional purposes unless consent is obtained to do so.

Curling Alberta will not sell membership lists to any third parties.

CONSENT

Consent will be obtained to collect, use, or disclose personal information except in the following limited circumstances:

- In an emergency that threatens an individual's health, life, or personal security
- When the personal information is publicly available (such as phone numbers in a directory)
- When the collection, use or disclosure of personal information is permitted or required by law
- When we require legal advice from a lawyer

Consent may be provided in writing, electronically or orally (either in person or over the telephone).

In cases that do not involve sensitive information we may rely on "opt-out" consent. Consent may be implied where an individual is given notice and reasonable opportunity to opt-out of their personal information being used for mail-outs, the marketing of new services or products or fundraising and the individual does not opt-out.

Curling Alberta assumes consent to use, and where applicable, disclose personal information that we have already collected, for the purpose for which the information was collected.

An individual member may withdraw consent to the use and disclosure of personal information at any time unless personal information is necessary for Curling Alberta to fulfill its legal obligations.

Business contact information and other information that is publicly available is exempt from this policy as this type of information is not considered personal information and may be collected, used, and disclosed without consent.

STORING, SECURING AND MAINTAINING ACCURACY OF PERSONAL INFORMATION

We are committed to ensuring the security of the personal information provided to us by our members. We protect personal information in a manner appropriate for the sensitivity of the information. We make every reasonable effort to prevent any loss, misuse, disclosure, or modification of personal information, as well as any unauthorized access to personal information.

We will protect personal information using a range of measures which include:

Shredding paper records and permanently deleting electronic records

- Locking filing cabinets
- Performing employee security clearances and restricted "need to know" access

- The use of passwords on all Curling Alberta computers
- Use of intrusion detection software
- Continually reviewing and updating our security policies as technology changes

Curling Alberta will retain personal information only as long as necessary to fulfill the identified purposes or a legal or business purpose.

We will make a reasonable effort to ensure that personal information is complete and accurate. An individual may request access to or correction of their personal data by contacting Curling Alberta's Privacy Officer listed at the end of this document. The individual must provide sufficient information in their request to allow us to identify the information being sought. All requested personal information will be made available within 30 days.

QUESTIONS AND COMPLAINTS

The Privacy Officer is responsible for ensuring Curling Alberta complies with this policy and all applicable privacy laws.

If an individual member has a question or concern about any collection, use or disclosure of personal information by Curling Alberta, or about a request for access to their own personal information, please contact our Privacy Officer:

Curling Alberta Privacy Officer
11759 Groat Road
Edmonton, AB T5M 3K6
Phone 403-461-5498
Email: info@curlingalberta.ca Subject Heading "Privacy Officer"

CONFLICT OF INTEREST

POLICY STATEMENT

Within the spirit of the approved and adopted Governance Charter, this policy applies to the expected conduct of Directors, committee members and employees of the Curling Alberta, when carrying out the business and activities of the Curling Alberta. It enables Directors, committee members and employees to recognize and declare potential conflicts of interest.

DEFINITIONS

- a) *“Officials”*: The word “Official” will be used throughout this document to include all members of the Curling Alberta (Directors), all members of committee(s), employees and representatives.
- b) *“Conflict of Interest”*: Officials are considered to be in a “conflict of interest” whenever they themselves, or members of their family, business partners or close personal associates, may personally benefit either directly or indirectly, financially or otherwise, from their position on the Association, committees or as an employee.

A conflict of interest may be “real,” “potential” or “apparent”; the same duty to disclose applies to each. Full disclosure in itself does not remove a conflict of interest.

- c) *“Committees”*: This policy applies equally to all committee members who participate in committees of the Curling Alberta.

PURPOSE

The purpose of this policy outlines the expectations of Officials when conducting activities that further the Curling Alberta’s programs and services. The policy sets forth guidelines for dealing with conflicts of interest and related matters. It is intended to protect Curling Alberta’s reputation for integrity, and to increase its capacity for effective governance.

POLICY

Curling Alberta Officials shall not:

- Engage in any business or transactions or have a financial or other personal interest which is incompatible with the discharge of their duties and obligations with the Curling Alberta.
- Knowingly place themselves in a position where they are under obligation to any person who might benefit from special consideration or favour on their part, or might seek, in any way, preferential treatment.
- Accord, in the performance of their duties and obligations, preferential treatment to relatives or friends or to organizations in which they or their relatives or friends have an interest, financial or otherwise.
- Benefit from the use of information acquired during the course of their duties with the Curling Alberta, which is generally not available to the public.
- Use Curling Alberta property, equipment, supplies or services of consequence for activities not associated with the discharge of official duties with Curling Alberta.
- Place themselves in a position where they could influence decisions or contracts from which they could derive any direct or indirect benefits or interest.
- Accept any gift that could reasonably be construed as being given in anticipation or recognition or of special consideration by the Curling Alberta, Committee Members, employees, representatives and decision makers of the Curling Alberta.

- In addition, engage in any outside work, activity or business undertaking that conflicts or appears to conflict with their duties as Directors, Committee Members, employees, representatives and decision makers of the Curling Alberta, in which they have an advantage or appear to have an advantage deriving from their association with the Curling Alberta.
- Act in a manner which is contrary to the best interest of the association.

PROCEDURE FOR DISCLOSURE

Individuals, who are elected, appointed or hired to positions within the Curling Alberta, will disclose their potential conflict in the following manner:

- Complete a declaration form at the beginning of their appointment. It is the responsibility of the individual to update information as required or at least once per year. If an Officer is unclear if there is a conflict, they are encouraged to consult the Board.
 - Whenever an Official or decision maker considers that he or she could be, or could potentially be, in a conflict of interest as defined within this policy, he or she shall disclose this conflict to the President & the Executive Director immediately.
- Any other Official of the Curling Alberta who feels that an Official of the Curling Alberta is in a conflict of interest, may report the matter to the President and the Executive Director at any time.
- If an Official of the Curling Alberta is in doubt as to whether or not conflict of interest situations exist, he or she should provide disclosure to the President and the Executive Director immediately.

PROCEDURE FOLLOWING DISCLOSURE

Once an Official of the Curling Alberta has provided disclosure of a conflict of interest with respect to a particular matter to be considered or decision to be made, the following principles shall apply:

- The individual in the conflict of interest may not participate in discussion of this matter as an advocate on his or her own behalf, either formally at the meeting or informally through private contact, communication or discussion, unless such participation is approved by a majority vote of the Curling Alberta Board of Directors
- The individual in a conflict of interest shall not participate in any vote on the matter and either the committee or board level.
- Documentation relating to conflict of interest situations shall be recorded in the Minutes of the Curling Alberta and all relevant committees of the Curling Alberta.

SANCTIONS FOR FAILURE TO ADHERE TO THIS POLICY

- Curling Alberta Board of Directors will review the situation, and if required will convene a hearing with the individual who is alleged to have failed to adhere to this policy. The final decision regarding a breach of this policy rests with the Curling Alberta Board of Directors.

In investigating the matter, convening a hearing, recommending sanctions, and deciding the outcome of any breach of this policy, the Curling Alberta Board of Directors will respect the principles of procedural fairness.

NEPOTISM POLICY

PURPOSE

The purpose of this policy is to avoid creating or continuing an employment situation where there is a potential for favoritism and/or conflict of interest. The intent of this policy is to protect both Curling Alberta and the individual employee. Curling Alberta supports hiring on the basis of merit and does not discourage nor prohibit the employment of more than one member of a family. However, there are circumstances in which the employment relationship would not be allowed:

For the purpose of this policy, relatives (including “step” relatives where applicable) shall be defined as:

- Spouses, including common law spouses and same sex partners (as defined by Alberta Human Rights)
- Children
- Grandchildren
- Parents
- Siblings
- Grandparents
- In-laws (employee's sibling's spouses, employee's children's spouses and the employee's spouses' siblings and parents)
- Aunts and Uncles
- Nieces and Nephews

Due to the potential for perceived or actual conflicts of interest, the following restrictions apply:

- No employee shall participate in or influence the outcome of the appointment, hiring, promotion, supervision, discipline or evaluation of a relative
- No person shall be hired or promoted to a position under any supervision
- No employee shall be hired who is a relative of the Executive Committee (HR Committee) of Curling Alberta

RESPONSIBILITIES

Employees have a responsibility to inform the Executive Director of Curling Alberta or the President of Curling Alberta of any actual or perceived conflict of interest

Employees who fail to disclose a conflict of interest shall be subject to appropriate disciplinary action which may include termination.

OTHER POLICY REFERENCES

Conflict of Interest

May 2022

CONCUSSION GUIDELINES AND RETURN TO PLAY POLICY

DEFINITIONS

1. The following terms have these meanings in this Policy:
 - a) “*Association*” – Curling Alberta;
 - b) “*Participants*” – Coaches, athletes, volunteers, renters, officials and other members.

POSITION STATEMENT

2. The Association takes seriously the health and well-being of all curlers and is committed to ensuring the safety of those participating in the sport of curling. The Association recognizes the increased awareness of concussions and their long-term effects and believes that prevention of concussions is paramount to protecting the health and safety of participants.
3. As part of a responsible risk management plan, the Association recommends that Curling Clubs adopt and implement these Guidelines, as well as recommend the following: use of double grippers (when not delivering a stone) and helmets (or other approved head protection) by novice curlers, or curlers who are at high risk of falling. This should include but is not limited to: i) FUNdamental, ii) Learning to Train, and iii) Active for Life.

PURPOSE

4. The Association enacts this Policy as a tool to help manage concussed and possible concussed participants. The Policy provides guidance in identifying common signs and symptoms of concussion, protocol to be followed in the event of a possible concussion, and return to play guidelines should a concussion be diagnosed.
5. Awareness of the signs and symptoms of concussion and knowledge of how to properly manage a concussion is critical to recovery and helping to ensure the individual is not returning to physical activities too soon, risking further complication.
6. Please keep in mind that a concussion is a clinical diagnosis that can only be made by a medical doctor. It is imperative that a medical doctor examines someone with a suspected concussion.

PROCEDURE

7. During all Association curling events, competitions, and practices, participants will use their best efforts to:
 - a) be aware of incidents that may cause a concussion, such as:
 - (i) Falls
 - (ii) Accidents
 - (iii) Collisions
 - (iv) Head trauma – (blow to the head, face or neck, OR a blow to the body that transmits a force to the head)

- b) recognize and understand the symptoms that may result from a concussion. These may appear immediately after the injury or within hours or days of the injury and may be different for everyone. Some common signs and symptoms include, but are not limited to:
 - (i) Nausea
 - (ii) Poor concentration
 - (iii) Amnesia
 - (iv) Fatigue
 - (v) Sensitivity to light or noise
 - (vi) Irritability
 - (vii) Poor appetite
 - (viii) Decreased memory
 - (ix) Poor balance
 - (x) Slowed reaction time
- c) Identify injured participants or other individuals who have been involved in any of the above incidents and/or exhibit any of the above symptoms.

RESPONSIBILITY OF COACH, ADMINISTRATOR AND/OR SUPERVISOR, CHIEF UMPIRE

- 8. If a participant has been identified as having a suspected concussion, the coach, administrator and/or supervisor of that activity will notify all affected parties, including the participant, a parent/guardian (when appropriate) as well as other coaches, administrators and/or supervisors of the suspected concussion. At this point, the individual should not participate in any physical activity until he/she has visited a medical doctor.
- 9. If the participant is unconscious – initiate emergency action plan and call 911
 - a) If applicable, contact the child/youth's parent/guardian to inform them of the injury and their child is being transported to hospital.
 - b) Stay with the individual until Emergency Medical Services arrives.
 - c) Monitor and document any physical, emotional and/or cognitive changes.
 - d) Even if consciousness is regained, he/she needs to be examined by a medical doctor prior to the participant returning to physical activity.
- 10. If the Participant is conscious – remove the participant from the activity immediately and:
 - a) Notify the participant's parent (if the participant is a minor) or someone close to the participant (if the participant is not a minor).
 - b) Have a ride home for the participant arranged.
 - c) Isolate the participant into a dark room or area.
 - d) Reduce external stimulus (noise, other people, etc.).
 - e) Remain with the participant until he or she can be taken home.
 - f) Monitor and document any physical, emotional and/or cognitive changes.
 - g) Encourage the consultation of a physician.

INCIDENT REPORT

- 11. Once the injured participant has been properly attended to, an Incident Report shall be filed with the affiliated Club and the Association within 48 hours. (See Appendix "A")

RETURN TO PLAY

12. Once the participant's immediate needs have been met, the participant's family or the participant should be directed to the following protocol, in accordance with the following guidelines:
 - a. If no concussion is diagnosed: the participant may return to play for the next game, or during the same game according to the Rules of Curling.
 - b. If a concussion is diagnosed: the participant should only return to the activity after following the five steps outlined below and as directed by a physician. *(Please note that each step must take a minimum of 24 hours and the length of time needed to complete each step will vary based on the severity of the concussion. The concussed participant should be monitored regularly for the return of any signs and/or symptoms of concussion. If signs and/or symptoms return, consult with the medical doctor):*

STEP 1: Complete cognitive and physical rest. Immediately consult a physician. Limit school, work and tasks requiring concentration. Refrain from physical activity until symptoms are gone. Once all symptoms are gone, rest for at least another 24-48 hours and re-consult a physician, preferably one with experience managing concussion. In order to proceed to Step 2, medical clearance is required.

STEP 2: Light aerobic exercise to reintroduce physical activity: 10-15 minutes of low intensity activity like walking or stationary cycling. In order to proceed to Step 3, the concussed participant or parent/guardian if applicable must report back to his/her coach, administrator and/or supervisor that he/she is symptom free.

STEP 3: Sport-specific exercise: 15 minutes of low intensity participation like throwing rocks. The environment should be managed so as to ensure the participant is at minimum risk of falling or colliding with other participants. The participant may also attempt basic balance drills. In order to proceed to Step 4, the concussed participant or parent/guardian if applicable must report back to his/her coach, administrator and/or supervisor that he/she is symptom free.

STEP 4: Activity with no body contact: non-contact practice and non-contact sport specific drills – no activity that involves head impact or other jarring motions. In order to proceed to Step 5, the participant must provide written documentation from a medical doctor to his/her coach, administrator and/or supervisor. The documentation must state that the individual is symptom free and able to return to full participation in physical activity.

STEP 5: Full participation in non-contact sports once cleared by a physician.

MEDICAL CLEARANCE

13. This Policy requires the participant to consult with a physician throughout this process AND provide proof of medical clearance before being eligible for Steps 2 and Steps 5 noted above. The Association will comply with all directions provided by the physician, which may supersede this policy.

14. If a participant is showing signs of concussion and/or has been clinically diagnosed as concussed, the Coach, Administrator and/or Supervisor of that participant shall prevent the participant from curling until the required medical clearance has been provided.
15. Once the participant has provided medical clearance, the coach, administrator and/or supervisor will be required to forward a copy of the medical clearance letter to the affiliated Club, PSO and to the Association where it shall be attached to the participant's Incident Report for record keeping purposes.

NON-COMPLIANCE

16. Failure to abide by any of the guidelines and/or protocols contained within this policy may result in disciplinary action being taken by the Association.

Credits:

Club Coach: Youth Module 3 © Curling Canada and Coaching Association of Canada

Canadian Sport For Life – Physical Literacy: PLAY SAFE: Physical Literacy and Injury Prevention Guide for Leaders.

Ontario Curling Council – Jennifer Ferris

INCLUSION AND ACCESS POLICY

PREAMBLE

Curling Alberta is committed to ensuring that inclusion and access is incorporated across all activities of the organization. As the Provincial Sport Organization, Curling Alberta will work with members to develop programs and services for all participants in the sport of curling in accordance with existing Human Rights Legislation.

Sport is based on equity and access. Sport is welcoming and inclusive, offering an opportunity to participate without regard to age, gender, race, language, sexual orientation, disability, geography, or economic circumstances. Participants have access to affordable sport opportunities that are appropriate to the level of activity chosen and provide opportunities for personal achievement.

DEFINITIONS

Under-represented populations of Alberta – includes women and girls, children in low income families, Indigenous people, people with disabilities, older Albertans, newcomers to Canada and members of the Lesbian, Gay, Bisexual, Trans and Queer (LGBTQ) communities.

- a) *“Provincial Sport Organization (PSO)”*: Curling Alberta
- b) *“Member Association (MA)”*: Curling Alberta

PURPOSE

The purpose of this policy is clearly identify Curling Alberta’s commitment to inclusion and access in all programs, services, and operations. Actions to be taken in the event of violation of this policy are addressed by Curling Alberta’s Code of Conduct policies.

POLICY

1. The policy of Curling Alberta is to respect the rights, dignity, and work of every person and will treat everyone equally regardless of age, ability, gender, race, ethnicity, religious belief, sexuality or social/economic status.
2. Curling Alberta will support inclusion and access for all participants that include population sectors that are identified by Sport Canada and Alberta as underrepresented populations.
3. Curling Alberta will ensure that the concerns and needs of all people are identified, promoted, and supported. The achievement of equal opportunity is a key consideration when developing, updating or delivering programs and services. Curling Alberta is committed to everyone having a responsibility to oppose discriminatory behavior and promote equity of opportunity.
4. Curling Alberta will ensure that its governance structure encourages and promotes the full and equal participation and access.
5. Curling Alberta is committed to everyone having the right to enjoy their sport in an environment free from threat of intimidation, harassment, and abuse.
6. Curling Alberta will deal with any and all incidences of discriminatory behavior according to its Code of Conduct.

TRANSGENDER AND NON-BINARY INCLUSION POLICY

PREAMBLE

Curling Alberta is committed to being a transgender and non-binary inclusion leader in sport and promoting substantive equality. Curling Alberta welcomes participation from all curlers at all levels of competition and supports those who are transgender or non-binary. In partnership with Curling Canada, provincial partners, and thought leaders, Curling Alberta is devoted to maintaining a policy which addresses the needs of transgender and non-binary athletes and endorsing the adoption of best-practices within the curling community. The purpose of this policy is to establish clear guidelines about the inclusion of transgender and non-binary curlers in Curling Alberta events. It also provides guidance on how to support transgender and non-binary curlers in provincial, local and curling centre events. Curling Alberta is further committed to working with curling centres within its boundaries to provide education on transgender-inclusion to its stakeholders and transition support measures for its participants. The following policy will apply to all of Curling Alberta's programs and competitions up until the point they must comply with the rules of the national or international governing body which may or may not align with this Policy.

PURPOSE

Curling Alberta believes that all Participants deserve respectful and inclusive environments for participation that value the Participant's gender identity and gender expression. Curling Alberta wishes to ensure that all Participants have access to programming in which they feel comfortable and safe. Curling Alberta is committed to implementing this Policy in a fair and equitable manner.

SCOPE & INTERACTIONS WITH ALBERTA'S FAIRNESS AND SAFETY IN SPORT ACT

Curling Alberta is an in-scope organization under [Alberta's Fairness and Safety in Sport Act](#) and Fairness and Safety in Sport Regulation. Accordingly, Curling Alberta maintains a Fairness and Safety in Sport (Female Category Eligibility) Policy that applies only to competitions or divisions designated as female-only under the Act and Regulation. In those female-only divisions, eligibility is determined in accordance with that policy and the legislation.

For all other categories of participation—including but not limited to Men's, Mixed, Mixed Doubles, Wheelchair, Triples, Open/Co-ed, and non-competitive/recreational programming—Curling Alberta's Transgender and Non-Binary Inclusion Policy continues to apply in full. These categories are outside the scope of the Female Category Eligibility requirements set by the Act and Regulation. Precedence. Where there is any inconsistency, the Fairness and Safety in Sport (Female Category Eligibility) Policy governs female-only divisions as required by provincial law; in all other categories, this Transgender & Non-Binary Inclusion Policy governs.

Effective date. This section takes effect on September 1, 2025, when the Act and Regulation come into force, and will be updated as required by any subsequent amendments or directives.

CURLING ALBERTA GUIDING PRINCIPLES

Curling Alberta utilizes the following guiding principles in developing and applying this Policy:

- a. Curling Alberta respects all backgrounds, experiences, and identities and welcomes all

people to participate with their peers and experience the joy and spirit of curling as their truest selves.

- b. Curling Alberta recognizes that gender expression and/or gender identity may or may not be the same as a person's assigned sex and that gender identity does not function on a binary system.
- c. Transgender athletes in developmental and recreational sport will be able to participate in either their sex assigned at birth or the gender category in which they identify. Any transgender athlete who needs to invoke this Policy must only communicate this to Curling Alberta to allow for implementation. The same policy of inclusion would apply to high performance athletes up until the point where they must comply with international federation rules.
- d. Non-binary athletes in developmental and recreational sport will have the choice to participate in any of the available gender categories. Any non-binary athlete who needs to invoke this Policy must only communicate this to Curling Alberta to allow for implementation. The same policy of inclusion would apply to high performance athletes up until the point where they must comply with rules of the national or international governing body.
- e. Curling Alberta supports transgender and non-binary athletes and will provide a supportive stance for athletes that decide to share their identity with Curling Alberta. Recognizing the unique needs and experiences of transgender and non-binary athletes, Curling Alberta seeks to work collaboratively with the athlete to determine the best course of action for them based on complex factors, including gender affirmation, privacy, safety, and program availability.
- f. Each athlete is in control of the ways they present and express their gender identity, and as such, no athlete should have their identity disclosed without their express consent.
- g. Transgender and non-binary athletes should be able to use the change rooms of their choice.
- h. Hormone replacement therapy (HRT) should not be required for an athlete to participate in high performance sport (up to the point where international federation rules would take effect); and
- i. Surgical intervention should never be required for a transgender or non-binary athlete to participate in any level of curling that is governed by Curling Alberta.

DEFINITIONS

The following terms are applicable to this document:

- a. "Bona fide" – Acting in good faith, without deception or fraud;
- b. "Cisgender" – A term to describe a person whose gender identity corresponds with their birth-assigned sex (e.g. someone whose gender identity is woman and was assigned female at birth);
- c. "Gender binary" – A social system whereby people are thought to have either one of two genders: man or woman. These genders are expected to correspond to sex assigned at birth: male or female. In the gender binary system, there is no room for diversity outside of man or woman, for living between or outside of these genders;
- d. "Gender expression" – The way an individual expresses themselves in terms of their behaviour, body language, voice, emphasis or de-emphasis of bodily characteristics, choice of clothing, hairstyle, and wearing make-up and/or accessories. The traits and behaviours are labeled as masculine, androgynous, feminine are culturally- and geographically-specific and change over time;
- e. "Gender identity" – A person's innermost sense of their own gender. This can include man, woman, both, neither or something else entirely. There are lots of words people may use to talk about their gender identity;

- f. “Gender affirming procedures” – Medically-supervised program of treatment to transition a person’s body to align with their gender identity through hormone therapy, surgeries, and other procedures;
- g. “Non-binary” – People whose gender identity is neither exclusively female nor male. Some individuals self-identify as non-binary, whereas others may use terms such as genderqueer, bi- or polygender, genderfluid, gender non-conforming, or agender. Non-binary people may or may not conform to societal expectations for their gender expression and gender role, and they may or may not seek gender affirming medical or surgical care.
- h. “Participant” – Includes all individuals employed by or engaged in Curling Alberta activities and programs;
- i. “Sex” – The classification of people as male, female or intersex. Sex is usually assigned at birth (with the exception of intersex) and is based on an assessment of a person’s reproductive system, hormones, chromosomes and other physical characteristics, most notably by external genitalia;
- j. “Substantive Equality” – means understanding and meeting the needs of disadvantaged persons or groups using historical, legal and social contexts;
- k. “Transgender” – People whose gender identity differs from the sex they were assigned at birth. In order to align their bodies with their sense of gender, some transgender individuals undergo gender affirming procedures;
- l. “Transgender Girl/Woman” – Someone who was assigned the male sex at birth, and identifies as a woman;
- m. “Transgender Boy/Man” – Someone who was assigned female sex at birth, and who identifies as a man; and
- n. “TUE” - Therapeutic Use Exemption.

ACTIONS FOR INCLUSION

Curling Alberta pledges to:

- a. Provide this Policy to Curling Alberta staff, Directors, national team coaches, managers, and trainers and offer additional inclusion education and training opportunities on its implementation;
- b. Provide registration forms and other documents that enable:
 - i. The Participant to indicate their gender identity, rather than their sex or gender;
 - ii. The Participant to abstain from indicating a gender identity with no consequence to the Participant;
 - iii. The Participant the opportunity to indicate the pronoun(s) they use; and
 - iv. The Participant to indicate the name they go by on a daily basis (called a Lived Name), if different from their legal name.
- c. Maintain organizational documents on Curling Alberta’s website in a manner that promotes inclusive language and images;
- d. Refer to Participants by their lived name and pronouns;
- e. Work with transgender and non-binary Participants on the implementation and/or modification of this Policy;
- f. To establish change room guidelines;
- g. Ensure uniforms and dress codes that respect a Participant’s gender identity and gender expression; and
- h. Determine Eligibility Guidelines for transgender and non-binary participants (as described in this Policy).
- i. Transition support: Transgender athletes can request and expect to receive confidential support from coaches and leagues to explore options for staying or leaving their current team, washrooms and change room access, if/how to announce to others, and surfacing

and addressing challenges (e.g., misgendering and misnaming).

ELIGIBILITY GUIDELINES – EXCEPTIONS

The eligibility guidelines of Curling Canada, the World Curling Federation, and/or any national/international games organization regarding transgender and non-binary athlete participation will supersede the eligibility guidelines as outlined in this Policy during Curling Canada, World Curling Federation, or national/international games organization sanctioned competitions.

ELIGIBILITY GUIDELINES

As a general guiding principle for Curling Alberta's eligibility guidelines, Curling Alberta supports the following statement from Creating Inclusive Environments for Trans Participants in Canadian Sport:

Based on this background and available evidence, the Expert Working Group felt that trans athletes should be able to participate in the gender with which they identify, regardless of whether or not they have undergone hormone therapy.

At both recreational and competitive levels, a Participant is able to participate in their sex assigned at birth or the gender category in which they identify; or choose in the case of a non-binary Participant. An athlete's declaration of gender identity through the process of registering for a gendered event is sufficient.

Participants are not required to disclose their gender identity or history to Curling Alberta or any of Curling Alberta's representatives (e.g., Coaches, Staff, Directors, Officials, etc.).

All athletes must be aware that they may be subject to doping control testing pursuant to the Canadian Anti-Doping Program. The administration of hormones as a component of gender reassignment will, in most cases, contravene the World Anti-Doping Code. Transgender athletes undergoing gender reassignment are encouraged to contact the Canadian Centre for Ethics in Sport (CCES) to determine what actions, if any, are required to obtain a TUE.

CONFIDENTIALITY

Curling Alberta will not disclose to outside parties any documentation or information about a Participant's gender identity.

ONGOING MONITORING

Curling Alberta commits to monitoring ongoing developments regarding national and international participation guidelines for transgender athletes and pledges to review and/or revise this Policy whenever new information becomes available.

RESOLVING GENDER IDENTITY AND EXPRESSION ISSUES

Should a Participant feel they have been subject to, or witness, discrimination, bullying, harassment, sexual harassment, vilification, or victimization based on gender identity or expression, they should take appropriate action through Curling Alberta's Discipline and Complaints Policy. For more information, please refer to Curling Alberta's web page for Safe Sport (www.curling.ca).

APPEAL

Any decision rendered by Curling Alberta in accordance with this Policy may be appealed in accordance with Curling Alberta's Appeal Policy.

CONTACT

Any questions regarding this Policy or inclusion can be sent to inclusion@curlingalberta.ca

MORE INFORMATION

Canada for the Advancement of Women and Sport and Physical Activity (CAAWS) (2017 Second Edition). Leading the Way: Working with LGBT Athletes and Coaches. A Practical Resource for Coaches. Access at:
<http://www.caaws.ca/e/wp-content/uploads/2017/05/LeadingTheWay-v2017.pdf>

Canadian Centre for Ethics in Sport (CCES) - Sex and Gender Diversity
<https://cces.ca/sex-and-gender-diversity>

This Policy is subject to review at least once every three years
Date of last review: March 2022

The publication of Curling Alberta policies will be in the English and French languages. In the case of conflicting interpretations, the English version will prevail.

SCREENING POLICY & PROCEDURE

EFFECTIVE DATE: MARCH 2, 2019

POLICY STATEMENT

Curling Alberta understands that screening personnel and volunteers is a vital part of providing a safe sporting environment for athletes. Like a growing number of sport organizations, Curling Alberta requires its Personnel who interact with athletes or placed in a position of trust or authority to obtain a Criminal Record Check (CRC).

DEFINITIONS

The following terms have these meanings in this Policy:

- a) *‘Criminal Record Check (CRC)’*– a search of adult convictions held within the Royal Canadian Mounted Police (RCMP) National Repository of Criminal Records.
- b) *“Personnel”*: Curling Alberta personnel include members and volunteers whose position with Curling Alberta is one of trust or authority. Curling Alberta personnel are required to obtain a CRC Criminal Record Check (CRC). Personnel include, but are not limited to, coaches, Directors of Curling Alberta, and Curling Alberta employees.
- c) *“Screening Committee”*: a committee of three (3) to five (5) members appointed by, and at the sole discretion of, Curling Alberta to administer this policy.

Purpose This Screening Policy will outline who is required to be screened, the procedures of being screened, and steps to be taken in the event of a positive CRC.

POLICY

1. This Policy applies to all Personnel.
2. Not all Personnel associated with Curling Alberta will be required to undergo screening through a CRC, as not all positions pose a risk of harm to Curling Alberta or to its participants. Curling Alberta will determine which Designated Categories of Personnel will be subject to screening.
3. CRCs are required for the following “Designated Categories” who work closely with athletes and who occupy positions of trust and authority within Curling Alberta:
 - a. Coaches
 - b. Directors of Curling Alberta
 - c. Employees

IT IS CURLING ALBERTA’S POLICY THAT:

4. Personnel in Designated Categories will be screened using CRC. There will be no exceptions.
5. CRC’s must be obtained every upon hiring and every three years thereafter.
6. Failure to participate in the screening process as outlined in this policy will result in ineligibility of the individual.
7. Curling Alberta will not knowingly place in a Designated Category an individual who has a conviction for a ‘relevant offence’, as defined in this policy.

8. However, where the Screening Committee is of the opinion that, notwithstanding a conviction for a relevant offence, a person can occupy a position in a Designated Category without adversely affecting the safety of Curling Alberta, an athlete or member of Curling Alberta through the imposition of such terms and conditions as are deemed appropriate, the Screening Committee may approve a persons' participation in a Designated Category.
9. If a person in a Designated Category subsequently receives a conviction for, or is found guilty of, a relevant offence, they will report this circumstance immediately to Curling Alberta.
10. If a person in a designated position provides falsified or misleading information, that person will immediately be removed from their Designated Position and may be subject to further discipline in accordance with Curling Alberta's Discipline and Complaints Policy.
11. Curling Alberta will accept CRC obtained by personnel for use by other agencies and/ or employers provided the CRC was issued less than three years ago, and with the understanding that a new CRC will be required at the three-year expiry date.

SCREENING COMMITTEE

12. The implementation of this policy is the responsibility of the Screening Committee of Curling Alberta which is a committee of three (3) to five (5) members appointed by, and at the sole discretion of, Curling Alberta. Curling Alberta will ensure that the members appointed to the Screening Committee possess the requisite skills, knowledge and abilities to accurately assess CRC and render decisions under this Policy. Quorum for the Screening Committee will be three members.
13. Curling Alberta may, in its sole discretion, remove any member of the Screening Committee. Where a position on the Screening Committee becomes vacant, either because a member has been removed or because a member has resigned, Curling Alberta, at its sole discretion, will appoint a replacement member.
14. The Screening Committee will carry out its duties, in accordance with the terms of this policy, independent of Curling Alberta.
15. The Screening Committee is responsible for receiving and reviewing all CRC with a "relevant offence" and, based on such reviews, making decisions regarding the appropriateness of individuals filling positions in Designated Categories within Curling Alberta. 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.

HOW TO OBTAIN A CRC CRIMINAL RECORD CHECK (CRC)

16. CRCs must be obtained every three years and proof of the CRC must be submitted and approved by Curling Alberta prior to interacting with young athletes (for other Personnel).
17. Personnel may obtain a CRC by visiting a local police station, submitting two pieces of government-issued identification (one of which must have a photo), and completing

paperwork or by using online services (Sterling Back Check)

18. The CRC fee for volunteers varies depending on local police service fees. Any such fees are the responsibility of the "personnel" obtaining the check.
19. Personnel must submit the proof of the CRC to Curling Alberta.

PROCEDURE

20. The CRC will be submitted to the Executive Director or Technical Coordinator of Curling Alberta in an envelope marked "Confidential" or via email.
21. Individuals who do not submit a CRC will receive a notice to this effect and will be informed that their application and/or position will not proceed until such time as the CRC is received.
22. The Screening Committee will receive and review all CRC's in which a "relevant offence" has been revealed.
23. Subsequent to its review of CRC, the Screening Committee, by majority vote, will:
 - a. Approve an individual's participation in a Designated Category; or
 - b. Deny an individual's participation in a Designated Category; or
 - c. Approve an individual's participation in a Designated Category subject to terms and conditions as the Screening Committee deems appropriate.
24. If an individual's CRC do not reveal a relevant offence, the Executive Director or Technical Coordinator will advise Curling Alberta that the individual is eligible for the Designated Category.
25. If an individual's CRC reveal a relevant offence, the Screening Committee will render its decision and provide notice of its decision in to Curling Alberta and the applicant.
26. The decisions of the Screening Committee are final and binding and will be effective upon notice being sent to the individual by email to his or her last known email address on record with Curling Alberta.
27. CRC are valid for a period of three years. However, the Screening Committee may request that an individual in a designated category provide a CRC to the Screening Committee for review and consideration at any time. Such request will be in writing and will provide the reasons for such a request.

RELEVANT OFFENCES

For the purposes of this Policy, guidelines and examples of a 'relevant offence' is any of the following:

28. If imposed in the last five years:
 - a. Any offence involving the use of a motor vehicle, including but not limited to impaired driving
 - b. Any violation for trafficking and/or possession of drugs and/or narcotics
 - c. Any offence involving conduct against public morals
29. If imposed in the last ten years:
 - a. Any crime of violence including but not limited to, all forms of assault
 - b. Any offence involving a minor or minors

30. If imposed at any time:
 - a. Any offence involving the possession, distribution, or sale of any child-related pornography
 - b. Any sexual offence involving a minor or minors
 - c. Any offence involving theft or fraud

RECORDS

Curling Alberta will retain copies of CRC for the period of its validity. Curling Alberta may also retain written records of communication with individuals whose CRC indicates a relevant offence, as well as copies of its decisions and written reasons for decisions. 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.

RISK MANAGEMENT POLICY

PURPOSE

The purpose of this policy is to provide a guidance on how risk will be identified, assessed, and comprehensively managed to improve organizational performance by:

- understanding risk management
- providing an educational component for staff, board members, and stakeholders
- reinforcing a risk management culture for Curling Alberta

Successful risk management should benefit Curling Alberta by

- preventing and/or limiting injury or loss
- protecting against litigation
- ensuring compliance with applicable laws, regulations, and standards
- improving the quality and relevance of the programs and services provided to members, participants, partners, and sponsors
- promoting improved business practices
- promoting improved human resource management practices
- enhancing Curling Alberta's brand, reputation, and image
- supporting the strategic objectives of Curling Alberta

RESPONSIBILITIES

The Board of Directors and Executive Director are responsible to ensure that risks have been appropriately identified, documented, assessed, and managed.

The Executive Committee is responsible to the Board of Directors for implementation of risk management plans and processes and is ultimately responsible to ensure that risks are assessed and managed appropriately.

All persons identified in the Policy Statement are responsible for ensuring that all appropriate and cost-effective steps are taken to minimize or control identifiable risks.

The Executive Director and the President will act as Risk Management Recovery Coordinators to implement the recovery plan when required.

PROCESS

Risk Tolerance

The Board will take a holistic approach to determining the risk tolerance. This will be done through an evaluation process. All risks assigned a high value must be evaluated by the Executive Committee and mitigation strategies and changes will be reported to the board immediately.

Reporting and Ongoing Monitoring

To ensure that risk management remains a high priority and to promote a risk management culture, the following actions will be undertaken:

- Curling Alberta will ensure that risk assessment is an integral part of strategic and business planning and reporting.
- Annually, the Executive Committee will present a review of the principal risks to the Association to the Board of Directors for discussion and direction

- Annually, the Executive Director will review and update all operational risks and the associated response to each.
- At each meeting of the board, the Board of Directors will schedule time for a discussion on risk; updating the registry, compliance, and progress as required.
- Risk reporting will be completed by submitting a request or through discussion at a board meeting and updated by a designated person.
- The Executive Director is responsible for updating the risk registry.
- The Executive Director will review the risk registry on a regular basis or as a risk arises and will provide updates on matters of risk to the Board.
- If changes or additional updates to the Risk Management Policy are needed during the year, board members and/or staff will bring forward to the Board for discussion and approval.
- Curling Alberta will report to members on any significant risks identified during the previous year and report back on how the risk is being managed.

BANNER POLICY

EFFECTIVE DATE: MARCH 30, 2019

POLICY STATEMENT

Curling Alberta (CA) is committed to recognizing provincial teams and provincial host clubs. The purpose of this Policy is to ensure the protection of Curling Alberta's brand and to uphold the value and prestige of its championships. This policy is in effect for the 2018-2019 season.

Banner types and details:

1. Provincial Berth Winners – Berths to Provincial Championships and Games
 - a. Curling Alberta will design requested banners for this category
 - b. Curling Alberta must approve all banner orders in this category
 - c. Curling Alberta does not provide (pay for) or present banners for this category
 - d. Teams or clubs wishing to order this type of banner can do so at their own cost through the CA office
2. Provincial Championship Winners
 - a. Curling Alberta will design banners for this category
 - b. Curling Alberta will provide (pay for) one banner per winning team
 - c. Curling Alberta will present banners in this category to the winning team at the Curling Alberta annual awards banquet in the same season in which the Championship was played
 - i. If the team/club is unable to receive the banner at the awards banquet, Curling Alberta will ship the banner to a recipient designated by the team
 - d. Teams or clubs wishing to order duplicate banners can do so at their own cost through the CA office
3. Provincial Championship Hosts
 - a. Curling Alberta will design banners for this category
 - b. Curling Alberta will provide (pay for) up to one banner per host club
 - i. Host clubs have the choice to receive a banner or alternative award (glass keeper trophy)
 - c. Curling Alberta will present banners in this category to the host club at the championship event
 - i. If the host club is unable to receive the banner at the championship event, Curling Alberta will ship the banner to the host club
4. Provincial Games Winners
 - a. Curling Alberta will design banners for this category
 - b. Curling Alberta will provide (pay for) one banner per winning team
 - c. Curling Alberta will present banners in this category to the winning team and/ or the representing club (of the teams designation) at the Curling Alberta annual awards banquet in the same season in which the Championship was played
 - i. If the team/club is unable to receive the banner at the awards banquet, Curling Alberta will ship the banner to the designated club
 - d. Teams or clubs wishing to order duplicate banners can do so at their own cost through the CA office

5. National Championships/Games Winners
 - a. Curling Alberta will design banners for this category only when there is no comparable banner provided to Alberta teams by the Canadian host organization(s). Eligible Alberta teams are any team who represented as Team Alberta at the Canadian competition
 - i. Curling Alberta will provide (pay for) one banner per winning team
 - ii. Curling Alberta will present banners in this category to the winning team and/or the representing club (of the teams designation) at the Curling Alberta annual awards banquet in the same season in which the Championship was played
 - iii. If the team/club is unable to receive the banner at the awards banquet, Curling Alberta will ship the banner to the team directly
 - b. Teams or clubs wishing to order duplicate banners can do so at their own cost through the CA office

Curling Alberta owns the designs of all banners listed above and must approve all proofs prior to production. Only names on the official roster for each competition will be permitted on the banners. In addition, Curling Alberta must approve any use of its logo. Any misuse or unapproved use of the Curling Alberta logo may result in disciplinary action or suspension.

TRAVEL & EXPENSE POLICY

EFFECTIVE DATE: JULY 30, 2018

POLICY STATEMENT

The purpose of this policy is to provide all Curling Alberta employees and associates (which includes contractors, consultants, Board members, committee members, etc.) general guidelines and information regarding travel and allowable business expenses, and the procedure for reimbursement of travel and business expenses.

Legitimate expenses, related to approved Curling Alberta travel or business, will be reimbursed by Curling Alberta, in accordance with this policy.

GENERAL

Curling Alberta will reimburse, or pay for, business travel and expenses that are legitimate, reasonable and appropriate for the business activity undertaken. All employees and associates, incurring business-related expenses on behalf of Curling Alberta, should bear in mind the following principles:

- Accountability – Curling Alberta has a responsibility to its stakeholders, including donors and funding agencies, and to those who depend on Curling Alberta's programs and services, to use its resources appropriately;
- Moderation – Curling Alberta believes in being efficient with its resources. Expenses should reflect the principle of moderation, ensuring that good value for money is obtained.
- Integrity – We are who we say we are. Nowhere is this principle more important than in the way employees and associates conduct themselves with respect to travel and business expenses.

Expenses that have already been, or will be, reimbursed by another organization, or that will be used for personal income tax purposes, will not be claimed from Curling Alberta.

Personal expenses incurred on behalf of the claimant, or his or her family or friends, will not be reimbursed. Individuals should neither gain nor lose personally as a result of incurring expenses on behalf of Curling Alberta. Any personal expenses incurred and paid for by Curling Alberta will be charged back to the individual.

All expense claims should be submitted for reimbursement within 30 days. Expense claims submitted later than the 30-day deadline may not be eligible for reimbursement. Expense claims submitted after year-end cut-off may not be eligible for reimbursement.

If there is any doubt as to the application and scope of this policy, the ED or Finance Coordinator should be consulted.

TRAVEL

Travel is an important aspect of Curling Alberta's operations. It represents a large expenditure that is within its control. The high cost of travel dictates that careful consideration should be given to the necessity and frequency of travel. At the same time, Curling Alberta has a

responsibility to reasonably provide for the comfort, safety and convenience of those who travel on its behalf.

Curling Alberta employees and associates who travel on Curling Alberta business shall be entitled to claim and be reimbursed for reasonable and actual expenses incurred, in accordance with this policy.

While the method of travel may be at the discretion of the traveller, he or she should consider all costs and time available and should select the least expensive option. In the case where an employee or associate chooses a more expensive mode of transportation for personal reasons, only the expense of the lower cost option shall be submitted for reimbursement. Where possible, individuals are encouraged to carpool to reduce costs.

Private automobile: Use of private automobile should be limited to those trips where suitable public transportation or car rental is not available or where a private automobile is more efficient, considering costs and time available.

Curling Alberta reimburses as per current CRA mileage rates. The current rate for allowance may be re-evaluated and adjusted from time to time. This rate is intended to cover the cost of gas, car insurance, repairs, maintenance, etc. No other vehicle-related expenses will be reimbursed. Curling Alberta does not provide personal automobile insurance. This is solely the responsibility of the driver or owner of the vehicle.

Air, bus, or rail: All travel will be paid, at the actual cost of the travel, based on an economy class ticket. Travel must be arranged through the designated travel agency, if one exists.

For air travel: the travel must be booked using the lowest possible airfare available from any airline for the requested trip, taking into consideration luggage fees, change fees, etc. The best cost travel will be booked within a one-hour window before or after the requested travel times, where possible. This option must be taken unless flight time or additional stops are unreasonable, in which case an alternate flight may be booked. Travel should be booked at least two weeks in advance of the scheduled dates, to obtain the most reasonable fare.

The traveller will also be reimbursed for the transportation to and from the departure point (example – taxi from home to airport or airport parking while away).

Curling Alberta will not pay for airline club or lounge access, and loyalty program costs.

Car rental: For rental cars, Curling Alberta will reimburse the rental fees and any gas receipts for the rented vehicle.

Automobile rentals are reimbursed for intermediate, compact or sub-compact sized vehicles only. Collision Damage and Loss Damage coverage offered by the rental agency is not necessary to purchase. The rental automobile value cannot be in excess of \$75,000 and cannot be for more than 30 days.

Original rental agreements are to be attached to the claim form, along with related fuel receipts. Before returning the vehicle to the drop-off location, the vehicle must be filled with fuel (or pre-purchased).

Car rentals must be arranged through Curling Alberta's exclusive car rental agency. Arrangements can be made either through the organization's travel agency or directly with the car rental agency.

Taxi, Parking, Other: All taxi receipts are required. The receipt must indicate date, starting point, and destination of each trip.

Parking expenses are allowable and must be accompanied by a receipt.

Traffic fines for speeding, parking infractions, etc. are the responsibility of the driver and will not be reimbursed or paid by Curling Alberta.

Curling Alberta does not provide personal automobile insurance. This is solely the responsibility of the driver or owner of the vehicle.

Accommodations: Actual and reasonable expenses for accommodations at a hotel, motel, or bed and breakfast facility, while travelling on official business, will be reimbursed. All such accommodations should be made at the lowest rate possible per night. Where possible, the maximum hotel expenditure shall be \$150.00 per night. Premiums for suites or deluxe rooms will not be paid or reimbursed.

When possible, travelers should consider using Curling Alberta's exclusive accommodation supplier, Best Western.

Reasonable and actual hotel, motel and lodging expenses shall be reimbursed at full cost on submission of original receipts. These expenses include the room charges and taxes. Meals should not be charged on hotel bills; they will not be reimbursed if a per diem applies (see Section 4.0). Curling Alberta does not reimburse for additional services provided by a hotel establishment, such as newspapers, movies, hotel tips, mini-bar and personal items. These expenses should be paid personally.

Original receipts (detailed hotel bill) must be attached to the Expense Reimbursement Claim Form. Documents such as credit card slips alone cannot be used for reimbursement, as they do not provide a detailed list of the charges being paid for and taxes charged.

Lodging per diem: If an employee chooses to stay with friends or family during a Curling Alberta business trip, he or she will be entitled to a \$50.00 per night lodging per diem. This rate may be reviewed and may be adjusted from time to time.

MEALS

An employee travelling for Curling Alberta business purposes is entitled to receive a subsistence per diem, at the current authorized levels, for the duration of the travel. The maximum per diem is \$60.00 per day, broken down as follows: Breakfast \$10.00 Lunch \$15.00 Dinner \$35.00

The per diem is instead of the reimbursement for actual costs. When receiving a per diem, a reimbursement may not be claimed over and above the per diem.

Food receipts are not required and need not be attached to the reimbursement form. The reimbursement will be limited to \$60.00 per day. Number of days claimed will include the date

of departure and date of arrival.

For travel outside Canada, the per diem will be calculated in US dollars, in Euros, or in Pounds. The foreign currency per diem will then be translated to the Canadian dollar equivalent at the rate outlined in section 6.0.

These per diem rates may be reviewed and may be adjusted time to time. When attending a conference or meeting, meals are often included in the conference fee or provided by the host. A per diem cannot be claimed in such cases.

Curling Alberta will reimburse full and actual meal expenses only when an employee is acting as a host of visitors on official Curling Alberta business. The nature and purpose of the event, including the name of the group, number of guests or names of the people being entertained, must be listed on the receipt or Expense Claim Reimbursement Form. The Officers of Curling Alberta may on occasion be acting as a host.

Only reasonable alcohol charges will be reimbursed where an employee or officers are hosting visitors on official Curling Alberta business.

For all business meals where more than one Curling Alberta employee is present, the most senior person must pay for the meal and submit the claim for reimbursement.

OTHER ITEMS GRATUITIES

Reimbursement may be claimed for gratuities paid in the course of incurring business expenditures, as follows:

- Baggage handling porters or valets – \$2.00 per occurrence.
- Taxicab drivers – must be reasonable, usually up to 15% of the fare.
- Housekeeping staff in hotels/motels – \$5.00 for the first day, and \$2.00 for each additional day.
- Restaurant wait staff – must be reasonable, usually up to 15% of the cost, excluding taxes, unless a higher amount is automatically added to the bill by the restaurant.

HOME OFFICE

There is no reimbursement for home office expenses.

INSURANCE

There is no reimbursement for flight cancellation insurance, travel medical insurance, or car insurance.

LAUNDRY & DRY CLEANING

Normally, costs of laundry and dry cleaning are a personal expense; however, when a business trip is planned for more than seven days or lasts longer than planned, if less than seven days, reasonable costs of laundry services and dry cleaning may be reimbursed. Receipts are required when available.

LEISURE AND ENTERTAINMENT

Personal leisure and entertainment expenses including, but not limited to, movies, exercise facilities, sporting events and activities, theatre productions, tourist attractions, sightseeing

trips are not reimbursable by Curling Alberta under any circumstances, whether incurred on travel or at home, for personal enjoyment or while entertaining guests.

LUGGAGE

Curling Alberta does not cover the costs of luggage, except for reasonable costs incurred to purchase a carrying bag or briefcase for a Curling Alberta-owned laptop computer. Curling Alberta will not pay for the cost of wrapping suitcases for travel. Curling Alberta will not reimburse for the cost of lost luggage.

PASSPORTS AND VISAS

Curling Alberta will not reimburse any individual for the cost of a passport or other travel documentation routinely required to travel outside the country, unless such costs are incurred solely for business reasons. Curling Alberta will not reimburse the cost of the NEXUS border clearing program.

Curling Alberta will reimburse the cost of a visa or other specific documentation that is required to enter another country specifically for Curling Alberta business.

TELEPHONE

Curling Alberta employees and associates may be reimbursed for reasonable and occasional out-of-pocket telephone costs, such as long distance, incurred in the performance of their position responsibilities.

Curling Alberta employees and associates who travel on Curling Alberta business may be reimbursed for the reasonable costs of calling home during their absence.

While use of a business cell phone for personal use is permitted, any additional charges for personal use including long-distance calls, roaming charges, and text messages, other than as noted above, are to be considered a personal expense and reimbursed to Curling Alberta. When a Curling Alberta employee is travelling outside of the country, he or she must advise the ED, prior to the departure, so that the appropriate travel plan can be added to cell phone package. Failure to inform the ED may result in additional charges that may be charged back to the individual. Please refer to the Cell Phone and Portable Device Policy for additional information.

FOREIGN CURRENCY TRANSACTION

If an expense is paid in a currency other than the Canadian dollar, the actual amount paid in the foreign currency must be indicated on the Expense Claim Reimbursement Form. The reimbursement will be made in Canadian dollars only.

For US dollar or foreign currency transactions, if the exact equivalent amount paid in Canadian dollars is available, such as included on a credit card statement, please attach the credit card statement to the claim form. That rate will be used to calculate the reimbursement. If a US or foreign bank withdrawal was made and the expenses were paid in cash, the rate used to calculate the reimbursement will be the actual exchange rate, as per the banking slip, if provided.

In all other cases, Finance will use the most recent Bank of Canada rate available.

You are encouraged to exchange your money at a local bank, prior to leaving on your trip, to benefit from a better exchange rate.

CASH ADVANCE

A cash advance or request for per diem allowance is a loan given prior to travel in order to cover various legitimate travel and business expenses.

Individuals who are travelling on Curling Alberta business should pay for the expenses and then claim reimbursement upon their return. If there are exceptional circumstances warranting a cash advance, such as a trip to a country where use of a credit card is not possible, an advance is possible, within the following guidelines. A full accounting of the funds used, along with an Expense Claim Reimbursement Form, must be provided within five business days of the conclusion of the event, or return from the trip for which the advance was provided.

Guidelines:

- A Cash Advance Request Form (see form attached – Appendix 2) must be submitted at least two weeks prior to travel.
- The form must be approved by the ED.
- Advances are available for employees of Curling Alberta only.
- The amount of the cash advance is determined on a case-by-case basis and considers the location and duration of the trip.
- The maximum cash advance is \$2,000, unless otherwise pre-approved by the ED.
- A flight itinerary or hotel confirmation must be attached to the Request Form.
- It is the responsibility of the employee to provide the itinerary (ies) as support for the advance.
- Advances must be reconciled at the end of each trip and are considered a loan to the employee until the Expense Reimbursement Claim Form is submitted. If expenses are not submitted in a timely manner, the employee may be required to reimburse the advance.

APPROVAL PROCESS

The claimant is responsible for ensuring that claims for expenses are accurate and reasonable. By signing the Expense Reimbursement Claim Form, the claimant confirms that all expenditures incurred are related to Curling Alberta business, that charges included have not been submitted to other organizations for reimbursement, that expenditures are in accordance with Curling Alberta policies, and that they will not be used for income tax purposes.

The Expense Reimbursement Claim Form must be signed by both the claimant and the ED. Any claims submitted by the ED must be approved by another person with signing authority.

The individual who approves the Expense Reimbursement Claim Form is also responsible for ensuring that the reimbursement is made in accordance with Curling Alberta policy and that the amounts are charged to the proper accounts.

To be reimbursed, expenses must have been incurred by the claimant; no person may request reimbursement for expenses that have been paid by another individual. Approval and reimbursement of the expense claim does not constitute final acceptance. All transactions are subject to subsequent audit adjustment. Amounts refused must be reimbursed personally by claimants.

The ED has the obligation to refuse claims that do not conform to this policy. The ED may also authorize expenses that are not clearly covered by this policy.

REIMBURSEMENT PROCEDURE

For a prompt and efficient reimbursement, the claimant must complete an Expense Reimbursement Claim Form. A form that is not properly filled out, signed and approved, may be returned to the claimant. The Expense Reimbursement Claim Form should be used only to reimburse individuals for allowable travel and business expenses. For payments to companies or individuals outside Curling Alberta, an invoice from that company or individual should be submitted to Finance, in lieu of the Expense Reimbursement Claim Form.

Specific Requirements and Instructions:

- A separate Expense Reimbursement Claim Form should be submitted for each project or trip.
- The dates and purpose of the trip must be listed on the Expense Reimbursement Claim Form.
- The specific nature of all expenses must be clearly identified.
- Claims should be submitted within 30 days following the completion of travel, or other activity for which expenses were incurred. o Timely reporting is important to ensure that charges are recorded against departmental accounts in the correct accounting period. o If an advance was processed, any delay in submitting the expense report, and reconciling the advance, could delay reimbursement and prevent the allocation of future advances.
- Once the Expense Reimbursement Claim Form is completed and signed, attach all original receipts and submit to Finance for processing.

Receipts:

- Original or photocopied receipts must be submitted.
- Receipts that are numbered and follow the order on the claim form are easier for Finance to verify and this will speed up the reimbursement process. Receipts not clearly identified and/or thrown into one envelope, will delay the processing of the claim and may be returned to the claimant.
- Receipts are not required for per diem meal or lodging claims or for mileage allowances. However, justification for the expense must be included with the claim form.
- If a receipt is missing, an explanation should be included.
- To avoid any confusion, please do not label expense items as "miscellaneous."
- Original receipts must support all expense reimbursement claims, except when allowances are paid on a per diem basis. When expenses are charged to a credit card, both the credit card slip and the detailed receipt listing the items purchased should be submitted. When original receipts are not available, a personal declaration and detailed explanation must be provided. While expenses will continue to be reimbursed to individuals who occasionally misplace a receipt, provided the expense is reasonable and adequately explained, individuals who repeatedly and frequently misplace receipts should be aware that Curling Alberta is under no obligation to reimburse them.

Personal Expenses:

Personal expenses should never be submitted on a business expense claim. If a portion of a claim is for personal reasons, the amount must be deducted from the claim. If items of a personal nature are claimed, Curling Alberta will either refuse the claim, deduct the amount directly on that claim, or make arrangements for reimbursement via payroll or subsequent

claims. This may delay the reimbursement process.

Processing: The ED and signing authority will review the expense reports for compliance with the established policies/guidelines. Any discrepancy from policy must be explained and be approved by the ED and second signing authority.

A reimbursement, via direct deposit or cheque, will be processed on the next weekly cheque run following the receipt of the properly completed and approved form. However,

- When a claim form is not complete, the processing will be delayed,
- Any request for documentation or clarification of expenses will delay the payment of expense claims, and
- Incomplete or unclear expense reports or missing original receipts will delay the process.

PURCHASING POLICY

POLICY STATEMENT

The purpose of this policy is to ensure the transparency of operations and to obtain the desired quality of services and supplies at a competitive price.

BACKGROUND

1. An attempt will be made in all cases to achieve the lowest priced, technically acceptable product given time and availability constraints. Further, and where practical every effort will be made to acquire the goods in the following order:
 - a. Borrow;
 - b. Rent or Lease;
 - c. Purchase
2. All purchasing decisions shall recognize the following:
 - a. The contribution of the local business community to the Association's success
 - b. The contribution of the Alberta business community to the Association's success;
 - c. The contribution and/or contractual agreements with the Association's sponsors and suppliers;
 - d. The need for competitive bidding among suppliers; and
 - e. Budget constraints

POLICY

1. No purchases will be approved unless they are in the Board approved Budget.
2. The Curling Alberta Board may approve unbudgeted amounts or take other action to address the Association's budget. The ED, financial coordinator and Committee Chair is responsible to monitor not only expenditures, but also Gift-in-Kind required to support their committees.
3. Purchases of up to \$2,000 (no tenders or quotes required) may be approved by the ED as per the Operational Budget Approved by the Board.
4. Purchases in excess of \$2,000 and less than \$10,000 (tenders or quotes required, minimum 2) may be approved by the ED as per the Operational Budget Approved by the Board.
5. For purchases in excess of \$10,000, tenders or RFP's will be required except on the approval of the Alberta Curling Federation Board of Directors.
 - a) For all purchases in excess of \$10,000, requests for proposals and tenders must be submitted to the Executive Director or Financial Coordinator prior to being released. An attempt will be made in all cases to achieve the lowest priced, technically acceptable product given time and availability constraints. The ED/ Financial Coordinator will review the package with the president.
 - b) Given the need to consult with the above, it is important that Board Members or committee chairs submitting packages allow a minimum of seven (7) working days for the Finance committee to return the package with any changes required. A list of vendors where the RFP (Request for Proposals) or RFT (Request for Tender) will be

sent out should accompany the proposal or tender as well. A list of approved vendors can be obtained by the Association's office but this list will not limit where they can be sent.

- c) The Executive Director and Treasurer are available to consult with Committee Chairs and Board members who are in the process of developing tender packages. A tender template is required which is available from the Association office if needed. Generally speaking; "Requests for Proposals" – (RFP) or "Requests for Tender" – (RFT) should contain the following information:
 - i. Association's legal name
 - ii. Specific details of what goods or services re required
 - iii. Specific terms and conditions of the goods and/or services required
 - iv. Lowest or any proposal/tender will not necessarily be accepted
 - v. Expiry date for the receipt of RFP or RFT
 - vi. Proposal or tender is revocable
 - vii. Statement that the information provided in the request is believed to be accurate at the time
 - viii. Selection Criteria to be used
 - d) Curling Alberta's Finance Committee shall have final approval on RFP's over \$10,000. This can be done by email/telephone survey. The Curling Alberta Board shall have final approval on RFP's over \$20,000 which may be done in the same manner.
6. Petty Cash – The Executive Director will reimburse cash for purchase of office supplies:
- a. If the purchase was approved by the Executive Director previous to the purchase.
 - b. Upon submission of an expense form containing original receipt with details of expenditure.
 - c. If the purchase is less than \$50.

LARGE EVENT POLICY

POLICY STATEMENT:

Based on this policy, Curling Alberta will:

- support bids for large events to be held within its boundaries
- Identify revenue streams created by large events and how those funds will be allocated and/or distributed
- Identify which party holds the right to host online and in-venue raffles held in conjunction with the events.

DEFINITIONS

On an annual basis, Curling Alberta will review the classification of large events as either Tier 1 or Tier 2 and revise as appropriate.

Events within scope of this policy include, but are not limited to:

- A. Tier 1 events:
 - a. Olympic Trials (Curling Canada Roar of the Rings)
 - b. Men's Canadian Championship (Curling Canada Brier)
 - c. Women's Canadian Championship (Curling Canada Scotties Tournament of Hearts)
 - d. Men's World Championship
 - e. Women's World Championship
- B. Tier 2 events:
 - a. Canada Cup (Curling Canada)
 - b. Continental Cup (Curling Canada)
 - c. All other national championships not listed above.
 - d. Grand Slam of Curling events (non Curling Canada events)
 - e. All other world championships not listed in Section A.

REVENUE STREAMS

- A. Each event can create revenue. Recognized revenue streams by Curling Alberta include, but are not limited to:
 - a. Net Ticket Sales
 - b. Member Association (MA) Revenue sharing from Curling Canada
 - c. 5050 proceeds

POLICY

- Curling Alberta will be named as both host committee and MA for all the Tier 1 events hosted within Curling Alberta's boundaries.
- Although Curling Alberta is named as host committee, this is for revenue sharing purposes. A local organizing committee (LOC) will work with Curling Canada to deliver the event.
- Curling Alberta will retain the revenue generated by the tier 1 events, unless otherwise agree to by the LOC.
- Large event funds will not be available to non-affiliated clubs.
- Tier 2 event funds will be retained by the LOC, if it is not Curling Alberta. If Curling Alberta is the host committee for Tier 2 events, then the above policy will apply.

For the following events, regardless of the location, Curling Alberta will hold the sole right to acquire an online raffle license:

- *All Curling Alberta Sanctioned Events. Note that host clubs may apply for an exemption which must be agreed in writing and may be executed by Curling Alberta's Board or Executive Director.*
- *Any Curling Canada Event*
- *Any World Curling Federation Event*

For these events, if hosted outside the greater Edmonton and Calgary areas, the Local Organizing Committee (LOC) shall retain the right to acquire a raffle license in order to host the fundraiser on-site (simultaneously while Curling Alberta runs an online raffle). Curling Alberta can negotiate a revenue sharing agreement with the LOC if deemed appropriate to ensure that the interests of the LOC are protected, which may be executed by the Executive Director.

If hosted within the greater Edmonton and Calgary areas (defined at the reasonable discretion of Curling Alberta's Board), Curling Alberta will hold the sole right to acquire a raffle license to conduct a fundraiser on-site. In the event both the on-site and on-line 5050 raffles cannot be run simultaneously (due to current gaming regulations) and if the event is broadcast, the online raffle will be prioritized and the rights to hold the license will remain with Curling Alberta.

When available, Curling Alberta can also host an online 5050 raffle for any Grand Slam Event.

Responsibilities

- Curling Alberta will only sanction and support events that follow this policy.
- Curling Alberta will not sanction nor support events that distribute funds to non- member clubs.

Enforcement

- Curling Alberta has the authority to not endorse or support large event bids if the revenue distribution does not follow this policy.

INVESTMENT POLICY

APPLICATION

Board of Directors, Finance Committee, Executive Director, and any appointed Investment Managers.

BACKGROUND

The purpose of this Investment Policy is to ensure prudent stewardship of Curling Alberta's financial assets. The Board of Directors recognizes its fiduciary responsibility to manage these assets with care, balancing capital preservation, liquidity, and returns to support the organization's operational stability, financial sustainability, and long-term mission.

PURPOSE

This policy sets out the responsibilities, guidelines, and restrictions for the investment of Curling Alberta's financial assets, including both restricted and unrestricted funds. The policy is intended to ensure that investment decisions reflect Curling Alberta's core values, risk tolerance, and ongoing financial needs.

POLICY STATEMENT

Curling Alberta's primary investment objectives, in order of priority, are:

1. Preservation of capital;
2. Maintenance of liquidity to meet short- and long-term obligations; and
3. Achieving a reasonable rate of return appropriate to the orgs. risk profile.

GOVERNANCE STRUCTURE

1. Board of Directors

- Holds ultimate responsibility for the oversight of all investment activities and for approving this policy and any material amendments
- Monitors overall investment performance and compliance with this policy, with assistance from the Finance Committee.

2. Finance Committee

- Reviews this Investment Policy annually and recommends changes to the Board as required.
- Reviews quarterly reports on investment holdings and performance.
- Advises the Executive Director and Board on investment decisions, structure, and management.

3. Executive Director

- Responsible for the day-to-day administration and implementation of this policy.
- Ensures investments comply with Board-approved guidelines.
- Engages and monitors any external investment managers, where applicable.
- Provides quarterly investment reports to the Finance Committee.

INVESTMENT FUNDS CLASSIFICATION

Curling Alberta's financial assets are divided into two portfolios based on time horizon and liquidity needs:

A. Short-Term Portfolio (Operating Reserves)

Includes:

- Operating reserve (minimum 3 months of budgeted operating expenses);
- Funds designated for contractual obligations (i.e. severance, lease payouts, statutory requirements);
- Other unrestricted funds required for short-term obligations (0–18 months).

Primary Objectives:

- Preserve capital;
- Maintain liquidity for predictable and unforeseen expenses;
- Optimize returns within a low-risk framework.

B. Long-Term Portfolio (Strategic Surplus and Restricted Funds)

Includes:

- Board-designated surplus funds not required for immediate obligations;
- Any externally restricted funds (grants, program commitments, etc.);
- Funds intended to support long-term sustainability and future operations.

Primary Objectives:

- Preserve capital in real terms (adjusted for inflation);
- Achieve moderate growth while managing risk;
- Generate steady, sustainable investment income.

AUTHORIZED INVESTMENTS

All investments must be denominated in Canadian dollars and placed with institutions subject to appropriate Canadian regulatory oversight and, where applicable, deposit insurance.

Permitted investments include:

- Cash and cash equivalents, including high-interest savings accounts;
- Demand and term deposits with Canadian Chartered Banks, Credit Unions, or Trust Companies;
- Guaranteed Investment Certificates (GICs), including ladder structures;
- Investment-grade fixed income securities or pooled funds (e.g., mutual funds or ETFs) investing primarily in such securities;
- Diversified pooled investment funds, including bond funds, balanced funds, or similar vehicles that align with the organization's objectives and risk tolerance;
- Broad, diversified public equity funds (e.g., ETFs or mutual funds), provided that:
 - Total equity exposure does not exceed 20% of the total portfolio (book value);
 - Investments are diversified across sectors and geographies;
 - No direct investment is made in individual publicly traded companies;
- Dividend-focused or balanced funds, provided they are diversified and consistent with the overall asset allocation limits;
- Enhanced fixed income strategies (e.g., short-duration bond funds or actively managed income funds), provided they maintain a low to moderate risk profile consistent with capital preservation objectives.

All equity exposure must be obtained through diversified pooled investment vehicles. Direct investment in individual securities is not permitted.

PROHIBITED INVESTMENTS

To ensure prudent risk management and preservation of capital, the following investments are prohibited:

- Direct investment in individual equities (public or private);
- Derivatives, including options, futures, swaps, or other speculative instruments;
- Direct foreign currency speculation or unhedged foreign currency positions outside of pooled funds;
- Cryptocurrencies or digital assets;
- Private loans or speculative lending arrangements;
- Leveraged or margin-based investments;
- Private equity or private debt investments;
- Direct real estate investments or real estate syndications;
- Segregated funds;
- Any investment structure that lacks transparency, liquidity, or appropriate regulatory oversight.

SOCIALLY RESPONSIBLE INVESTMENT PRINCIPLES

Curling Alberta will avoid known investments in sectors that conflict with its mission and values.

DIVERSIFICATION AND RISK LIMITS

- Maximum 25% allocation to any single corporate issuer (excluding Government of Canada and Provincial bonds).
- Maximum term to maturity: 5 years.
- Portfolio diversification will be maintained across sectors, issuers, and maturities to minimize concentration risk.

PERFORMANCE MONITORING AND REPORTING

- Investment performance will be reviewed quarterly by the Finance Committee.
- Short-term portfolio performance will be benchmarked against Canadian T-bill indices.
- Long-term portfolio performance will be benchmarked against a blended index of appropriate Canadian fixed income benchmarks.
- The Finance Committee will meet annually with the Executive Director (and external Investment Managers, if applicable) to review investment performance and policy compliance.

INVESTMENT MANAGER RESPONSIBILITIES (if applicable)

External investment managers, if engaged, must:

- Operate within the guidelines of this policy;
- Provide full monthly statements of holdings and performance;
- Report quarterly to the Executive Director and Finance Committee;
- Disclose any conflicts of interest or material changes to their organization, structure, or approach.

WITHDRAWALS

The Executive Director, in consultation with the Finance Committee, will manage withdrawals to meet operational and program requirements. The Finance Committee will be notified of any significant or unplanned withdrawals that may impact long-term investment allocations.

FEE STRUCTURE

Curling Alberta will seek to minimize investment management costs while ensuring quality service. Fee arrangements may include transaction-based fees, asset-based percentage fees, or other structures as deemed appropriate. When selecting investment advisors or managers, the Finance Committee will evaluate and compare fee structures to ensure overall costs remain reasonable and aligned with the organization's priorities.

POLICY REVIEW

This policy will be reviewed annually by the Finance Committee and updated as necessary to ensure it remains aligned with Curling Alberta's financial circumstances, organizational objectives, and risk tolerance.

FINANCE PROCEDURES

1. CASH RECEIPTS

Payments are received primarily via Stripe, cheque, EFT's or Direct Payments are made directly to the operating bank account (ATB). Cash transactions are more rare, and consist mostly of event registrations, clothing or equipment sales.

a. Payments by Cheque

Cheques are received by mail or drop off are received by the staff at the Percy Page Centre office. A photocopy of every of each cheque is made and collected for distribution to the Finance Coordinator. The cheque is then stamped on the back with the bank deposit stamp and recorded on the deposit slip.

b. Payments by Cash

Cash is only received in person by a Curling Alberta staff member. The cash is recorded on the cash receipt log immediately with source information (i.e.- payor, date, amount, description of payment). The cash receipt log is to be emailed to the ED and Finance Coordinator weekly for review/approval. Cash is stored in a lock box until it can be deposited.

c. Payments by EFT/Direct Deposit

Notices of direct payments will usually come in the mail and are received by staff. If a notice pertains to a grant or other support funding, a copy of that funding agreement must be attached to the notice of direct payment and provided to the Finance Coordinator. The Finance Coordinator will receipt the transaction in QuickBooks Online (QBO) and retain the documents for filing with the bank reconciliation.

d. Deposits

Deposits should be made at a minimum twice per month, or at the discretion of the staff. The bank teller will stamp a copy of the deposit slip in the deposit book. A photocopy of the deposit slip is to be made and any cheque stubs/photocopies, cash receipts, and any other info is to be attached and given to the Finance Coordinator for processing. *Any undeposited cheques will be help in a safe place.*

2. CASH DISBURSEMENTS

Payments are made by cheque or by Telpay, an online payment system. Requests for cash disbursements take many forms:

a. Invoices/Bills

Invoices may be received by mail or electronically by the staff. Each invoice must be stamped with an accounting coding stamp. Any categorization of the expense, if known (i.e.- event, competition, or program), should be noted on the invoice. All invoices must be reviewed and approved by the ED and then forwarded to the Finance Coordinator for processing. All invoices must have the word "Invoice" on the bill.

b. Expense Forms

Expense forms may be submitted by anyone for approved expenses incurred in the operations of Curling Alberta. An expense form should meet the following criteria:

- Name and address of submitting party;
- Date/Description of expense claim (i.e.- event competition, meeting, etc.);
- If claiming mileage, kms driven and start/destination;
- If claiming per diem, number of days and date range;
- If claiming accommodations/travel, a copy of receipt must be attached to the report;
- All amounts are clear and legible;

- Signature of expense claimer.

All expense reports must be reviewed and approved by the ED and/or a Board member. Electronic copies will be accepted, provided that all receipts are scanned and legible. Expense reports are submitted to the Finance Coordinator for payment processing. Expense claims should be submitted no later than 30 days following the date(s) of the expense activity. All claims must comply with the Curling Alberta Expense Policy.

c. Cheque Requisition Form

All other expense/payment requests must be submitted as a cheque requisition. It should follow similar criteria:

- Name of submitting party;
- Name and address of payable to (if other than requesting);
- Date and description of requisition (i.e.- event, competition, meeting, etc.);
- Amount;
- Required date of payment;
- Signature of requestor;
- All cheque requests must be reviewed and approved by the ED and/or a Board Member;
- Approved cheque requisitions are submitted to the Finance Coordinator for payment processing.

3. PAYMENT/DISBURSEMENT

Payments are processed on a weekly basis with the following methods:

a. Cheques

Cheque runs are done by the Finance Coordinator weekly or at the request of staff. Cheques are issued from the operating account and printed from QBO. The cheque package has three parts: cheque, remittance or detail stub, and the cheque stub retained by accounting. The cheque stub for accounting is detached from the cheque and attached to the supporting bills/expense report/cheque request. The cheque and the remittance stub is then attached by paper clip to the front of the cheque document package. Cheques are reviewed and signed by two authorized signatories, only when the following criteria have been met:

- Payee name matches the payee name/supplier found on the supporting documents;
- All supporting documentation to the payment amount is attached;
- All supporting documentation has been reviewed/approved (noted) by ED/Board member;
- The cheque is NOT issued to the signor.

b. Telpay

Telpay is an electronic payment system that facilitates direct deposit payments, with an approval process similar to the process to issue cheques.

1. Approved invoices, expense reports, and cheque requisitions are assembled and processed as payment through the "Telpay Clearing Account" in QBO by the Finance Coordinator.
2. The Finance Coordinator will set up each payment within the Telpay system and indicate the date of direct deposit.
3. The Finance Coordinator will submit the payment batch within the Telpay system.
4. The Finance Coordinator will scan/email all supporting documents to the payment batch to the Authorized Signors for their review.
5. The Finance Coordinator will submit the batch within the Telpay system.
6. An email will be generated from Telpay, detailing the payee, amount, nature of expense,

and date of deposit, to all authorized signors (see cheque signing).

7. Authorized signers will review the payment batch and, if accepted, approve the Telpay batch, initiating one code sent by Telpay to the Finance Coordinator.
8. The Finance Coordinator requires two codes from the authorized signors to submit the batch within the Telpay system. Any incorrect codes or changes to the payment batch after being sent for approval will immediately terminate the process for payment.
9. If a signor declines a payment for any reason, the appropriate correction must be made and the process is reinitiated.

The Finance Coordinator and ED will receive a confirmation email from Telpay once the payment has been processed. This confirmation is filed with the accounting records.

4. PAYROLL

The human resources function within Curling Alberta acts to staff the necessary positions required for operations. This section covers only the financial portion of employee compensation and termination.

a. New Hires

Accounting will require the following items to set up an employee for payroll:

- i. Signed Contract (Employee and Authorized Signor), indicating rate of pay and start date;
- ii. Completed TD1 (Federal and Provincial) forms, signed by the new employee;
- iii. Void cheque or banking information for payroll deposit.

b. Payroll Process

- Payroll is processed on a semi-monthly basis.
- Payroll deposits will be complete by the 15th and last day of each month.
- The Finance Coordinator will create recurring payment within the Ceridian payroll system for each employee, as per each employee's approved contract.
- Once a new employee is created within Ceridian, the Finance Coordinator will issue a report to the ED for approval. The employee payroll profile is then filed within the personnel file of the employee.
- Any retroactive pay for a new employee will be calculated by the Finance Coordinator and submitted to the ED for approval, prior to entry in the Ceridian system. Any changes to an employee's pay or deductions must be made in writing and approved by the ED. Adjustments to the ED's remuneration must be approved in writing by the Executive Committee.
- After each payroll run, the following reports are generated: Payroll Detail Register, Payroll Deduction Summary, and EFT Pay Memos. The payroll detail register shall be submitted to the ED at the end of each pay period for approval. The payroll deduction summary will be reviewed by the Finance Coordinator for accuracy. EFT Pay Memos should be distributed to Curling Alberta staff in a secure manner. Ceridian employs a secure and confidential Epost system for this purpose.
- T4s and T4 Summary are processed and issued by the Ceridian Payroll System every February. The manner of distribution should be a secure and confidential platform (see Epost above). A copy of the T4s and T4 summary should be reviewed by the Finance Coordinator, approved by the ED, and filed with Accounting.

c. Termination of Employment

The financial process for termination is as follows:

- The ED will advise the Finance Coordinator of the termination by email, indicating the last day worked, last day of work, and any vacation owed. Any written notice does not need to be provided but should be kept in the employee's personnel file.

- The Finance Coordinator will prepare a final pay memo and submit to the ED for review/ approval.
 - Within 30 days, the Finance Coordinator will prepare the Record of Employment for the departing employee. A copy is retained by accounting and human resources. The employee copy will be mailed by the ED.
- d. Payroll Changes
- Any other changes to the payroll process, such as wage increase, bonus or other payouts must be documented and approved by an authorized signor of Curling Alberta.

5. FINANCIAL REVIEW

Regular review of the financial function within Curling Alberta is conducted by the Finance Coordinator, Treasurer, ED, President, and Vice President, and the Curling Alberta Board of Directors. The below outlines these processes:

- a. Bank Reconciliations
- The Finance Coordinator will reconcile all bank/cash accounts within the QBO system. A reconciliation report is generated and includes details of both outstanding cheques and deposits. This report is attached to the monthly bank statement. The Finance Coordinator will initial the report and submit to the ED for his or her review and approval. Approved bank reconciliations will be filed within the accounting records. The last bank reconciliation of the fiscal year is additionally reviewed and approved by the Treasurer.
- b. Accounting System Access
- Access to QuickBooks Online is restricted to the following: Finance Coordinator, ED, and the Treasurer. These parties have full rights to view all financial transactions, and regular review is conducted as convenience allows.
- c. Financial Statement Review
- The Finance Coordinator prepares all financial reports including the following:
- Comparative Balance Sheet
 - Comparative Profit & Loss Statement
 - Budget vs Actual Profit & Loss Statement
 - Program/Event Reports as Required

The financial statement package is prepared monthly by the Finance Coordinator within 15 days of the new month. The package is reviewed by the Finance Coordinator and ED, and supplementary information/notes may be prepared for presentation to the Board. The financial statement package is presented to the Board of Directors by the ED. Once presented and reviewed, a Board member will initial a copy of the financial statement package. This copy is given to the Finance Coordinator to file within the accounting records.

Draft and audited financial statements are presented annually to the Board of Directors, and follow the same process as outlined above.

6. CAPITALIZATION

Any property purchased for over \$500, and that has a useful life of one year or more, should be capitalized for accounting purposes.

All property expenditures that do not meet the minimum cost of \$500 and has a useful life of less than one year, should be expensed.

CURLING ALBERTA ACCIDENT & INCIDENT REPORT FORM

ACCIDENT REPORT FORM			
Patient Information		Date:	
Last Name:		First Name:	
Address:			
City:		Postal Code:	
Mobile:		Home Phone:	
Gender	☐ Male ☐ Female	Age	Height
Weight			
Known medical conditions			
INCIDENT INFORMATION REPORT			
Date & time of incident:			
Time of first intervention:			
Time of medical support arrival:			
Describe the incident (person in charge version)			
Event & Conditions: (name the event when the incident took place, the location, surface quality, light, weather):			
Actions Taken:			
After treatment, the patient was:	☐ sent home		
	☐ sent to hospital		
	☐ back on the ice		
Form completed by [print]			
Date		Signature	

