

HUMAN RESOURCES POLICY HANDBOOK

January 2020



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A. INTRODUCTION:

This human resource policy manual is a summary of policies, procedures and practices related to human resource management at Curl BC.

The Chief Executive Officer (CEO) is accountable for leading an effective staff team and is thereby accountable for the policies outlined in this manual. Managers are responsible for human resource management within their own teams (contractors and volunteers) and should reference this manual to ensure organizational consistency in the application of these practices.

The CEO is responsible for maintaining the procedures and systems which support human resource management for the development and organization and is available to answer any questions or provide clarification on any content of this manual.

The benefits package, including the insurance and health plan and the group RRSP (if applicable), is coordinated through Sport BC. Questions regarding the benefits package may be directed either to the CEO or the Sport BC payroll department.

STATEMENT OF PHILOSOPHY:

Curl BC wishes to maintain a work environment that fosters personal and professional growth for all employees. Maintaining such an environment is the responsibility of every staff person. Because of their role, managers have the additional responsibility to lead in a manner which fosters an environment of respect for each person.

It is the responsibility of all staff to:

- Foster cooperation and communication among each other.
- Treat each other in a fair manner, with dignity and respect.
- Promote harmony and teamwork in all relationships.
- Strive for mutual understanding of standards for performance expectations, and communicate routinely to reinforce that understanding.
- Encourage and consider opinions of other employees or members, and invite their participation in decisions that affect their work and their careers.
- Encourage growth and development of employees by helping them achieve their personal goals and beyond.
- Seek to avoid workplace conflict, and if it occurs, respond fairly and quickly to provide the means to resolve it.
- Administer all policies equitably and fairly, recognizing that jobs are different but each is important; that individual performance should be recognized and measured against predetermined standards; and that each employee has the right to fair treatment.

MISSION, VISION, VALUES AND STRATEGIC PLAN

Mission Statement

Active, fun and social, the Curl BC community promotes, develops and supports curling throughout BC.

Vision

Curling is an integral part of the lifestyle, culture and heritage of BC.

Operational values

- **Family:** We are a community that acts like a family; connected and passionate about the sport of curling.
- **Excellence:** We are committed to meeting or exceeding the highest standards at all times.
- **Commitment:** We align personal and corporate goals so that the Curl BC community will successfully serve all curlers.
- **Integrity:** We are fair, consistent and forthright.
- **Respect:** We show respect by communicating, cooperating and collaborating with all of our members, partners and stakeholders.
- **Transparency:** We act openly, professionally and inclusively.

Strategic Plan

<https://www.curlbc.ca/strategic-plan/>

Curling BC reserves the right to modify the following policies as necessary and interpret its application, as it deems appropriate.

B. HUMAN RESOURCES POLICIES

EQUITY AND ACCESS (BG-APPENDIX 12)

Date of Board Approval: 24/09/2011

This policy recognizes that diversity is a source of strength and establishes that opportunities to participate in and lead our organization will be provided in a manner that respects the principles of equity and access.

Curl BC is committed to a sport and work environment that provides equitable opportunities and access, and treats all individuals with respect and fairness.

Equity is an organizational value strived for in all aspects of Curl BC. Equity refers to the belief and the practice of treating persons in ways that are fair, equal and just, regardless of their gender, race, ancestry, place of origin, color, citizenship, creed, sexual orientation, physical or mental disability, age, marital status or family status.

Equity does not necessarily mean that every person must be treated exactly the same and it does not require that females and males participate in the same activities. In order to be treated fairly, people may need to be treated differently, including having activities of their own choice provided and administered in a fair and unbiased environment.

Access refers to the design and implementation of programs and services available to everyone who is entitled to them, free of any form of inequity, or any barrier that violates the concepts of fairness and natural justice. Curl BC endeavors to support, encourage and ease participation of under-represented populations in all facets of curling (including but not limited to competition, administration, coaching, officiating and volunteering).

Curl BC is committed to equal opportunity in employment and all employment related decisions. Curl BC respects the principles of pay equity in relation to paid employees, thereby having equal pay for equal work by either gender. Curl BC is committed to practice family-friendly work practices such as flex-time, harassment policies, pay equity and non-discriminatory interview techniques.

As a Provincial Sport Organization, Curl BC shall work pro-actively with provincial and national agencies to identify and eliminate barriers facing women and minorities in sport.

Curl BC will not solicit nor accept sponsorship from companies that discriminate against identified groups.

Any athlete, employee, volunteer, official, board member, parent, committee member, or applicant for employment may appeal any decision of Curl BC if, in his/her belief, that decision does not reflect the principles of equity and access. This appeal is to be reported to the Board Chair, Harassment Officer or the CEO of Curl BC and will follow the Appeals Procedure established by the Curl BC Appeals policy.

This Equity and Access Policy is consistent with and complements the Curl BC Harassment Policy.

NEPOTISM

No candidate shall be hired for a position where they may report to, or supervise a member of their immediate family. Immediate family is defined as: parent(s), step parent(s), foster parent(s), sibling(s), grandparent(s), spouse {including common law and/or same sex partner}, step child(ren) or ward of the staff member, father-in-law or mother-in-law (including parent of same sex partner). Personal relationships with other employees or members of the Curl BC's Board of Governors or Committees should be disclosed prior to accepting any offer from the employer.

ORIENTATION

All new employees shall receive an orientation session which will encompass an overview of general policies, procedures and operations. This will also provide employees, new to either a position or Curl BC an opportunity to learn the performance expectations management has with regard to the position in question. They will be given access to this policy manual, sign confirming receipt and will be expected to learn its contents.

PROFESSIONALISM

When representing Curl BC, staff should dress (business casual) and behave appropriately. Employees should choose to dress in a manner which presents a professional image to the public and is respectful of others. Excessive use of profanity is neither professional nor respectful to co-workers and will not be tolerated.

EMPLOYEE DUTIES

Attached to the Employment Agreement is a description of the job and the associated responsibilities, along with any additional tasks that may be required. This document along with a work plan will be used to evaluate performance both during the probation period and after. If an employee is unsure of its contents, they should not hesitate to ask the CEO for clarification.

From time to time, it may be necessary to amend an employee's job description. These amendments will be discussed with the employee in advance, however, the final decision on implementation will be made by management.

EMPLOYMENT DESIGNATION

Employment designations are categorized as follows:

Full-Time Indeterminate:

- Salaried employment on a continuing basis, with no end date specified.

Full-Time Term:

- Salaried employment for a fixed period, and, at the end of the fixed period, the employee ceases to be an employee.

Part-Time Indeterminate:

- Salaried employment on a continuing basis for hours less than the standard workday, week or month.

Part-Time Term:

- Salaried employment for a fixed period, for hours less than the standard workday, week or month, and at the end of the fixed period, the employee ceases to be an employee.

Casual:

- Casual employees are paid by the hour to work on a casual basis as necessary. Benefits and deductions will be in accordance with current legislation.

Contractor:

- Contractors perform work that is usually non-recurring, temporary and specialized in nature. The bulk of the work is conducted off site. This person is not to be construed as an employee and no deductions will be made on his/her behalf. The individual must invoice for professional services rendered as per the terms of the contract agreement. The individual must also supply their own equipment and tools and cover costs related to their use. The employer may pay for travel and expenses as negotiated in their contract.

PERSONNEL FILE

Curl BC does collect personal information for inclusion in personnel files. This information is available to the employee and the CEO. This information is kept in a secure location, and is not shared with members of the Board of Directors or with funders. Information which is contained in an employee's personnel file may include the following: résumé, letter of offer, performance reviews, amendments to job descriptions, signed acknowledgement and agreement of the HR policy manual, disciplinary notices, salary and pay raises, tax forms, copies of enrolment forms for benefits and approved exceptional leave requests. Routine leave is tracked and recorded by each staff person under the staff's section of the Curl BC shared drive.

NON-FRATERNIZATION

Curl BC is committed to providing a work environment as free as possible from conflicts of interest, favoritism and exploitation. All employees should be aware that entering into a consensual romantic relationship with another employee, especially one in which one of the parties exercises direct supervision over the other, creates the potential for risk to both parties as well as for Curl BC. In particular, such a relationship will limit that employee's ability to direct work or promote that employee's career and creates conflicts of interest and perceptions of undue advantage.

For this reason, Curl BC desires to avoid situations where there is a romantic, personal or marital relationship between a supervisor and a subordinate or between co-workers.

Employees with, or who develop, such relationships must immediately notify and disclose all relevant circumstances to the CEO. Although Curl BC has no absolute prohibition regarding

such relationships, we reserve the right to take appropriate action, on a case-by-case basis, according to the relevant circumstances. Any failure to disclose the nature of the relations as contemplated in this policy may result in disciplinary action up to and including termination.

Curl BC strictly prohibits sexual harassment. In the event that a romantic relationship is consensual, and verified by both parties, this shall not constitute sexual harassment. In the event that the relationship ends for any reason, or is not consensual, any actions intended to coerce or otherwise harass an employee shall constitute sexual harassment.

POLICE RECORDS CHECK

Curl BC will comply with all provincial legislation regarding the protection of human rights for applicants when conducting any type of record check.

Curl BC shall establish that a position has a bona fide occupational requirement where a record check serves a legitimate purpose prior to requesting a record check from any applicants. Curl BC shall only request record checks should there be a legitimate purpose for the position. The type of record check which Curl BC shall request will be determined based on the type of position being hired for.

Curl BC shall only request that a candidate consent to a record check following standard hiring procedures, and after providing the candidate with a written job offer, conditional upon a satisfactory outcome.

There are three types of Record Checks:

1. Police Record Check
2. Criminal Record Check
3. Vulnerable Sector Record Check

Existing employees of Curl BC may be required to obtain a Criminal Record Check upon request by the CEO. All employees working with vulnerable persons must obtain a Vulnerable Sector Record Check upon request by the CEO. The cost of any such check will be borne by the Employer. Failure to adhere to such a request will result in disciplinary sanction up to and including termination of employment.

“Vulnerable persons” means persons who, because of their age, a disability or other circumstances, whether temporary or permanent,

- a) Are in a position of dependence on others; or
- b) Are otherwise at a greater risk than the general population of being harmed by persons in a position of authority or trust relative to them.

If during the time of employment, a criminal charge is brought against an employee or an employee is convicted of a criminal offence, it is the employee’s responsibility to report this information immediately and no later than 48 hours after they are first made aware of the charge or conviction.

Reporting Procedure:

Upon being made aware of a criminal charge or conviction being brought against an employee, a staff member is required to report this information immediately and no later than 48 hours, as follows:

- Contact the CEO by phone, followed immediately by written confirmation via e-mail; and
- If a criminal charge is brought against you or you are convicted of a criminal offence such that there would be a change in your Record Check, there may be adverse consequences to your status as an employee of Curl BC. This will depend upon the nature and circumstances of the charge or conviction. The ultimate determination of whether the employee with a positive Record Check can be allowed to continue with his or her employment will be made exclusively by the CEO.

Failure to report any criminal conviction and/or outstanding charges that have occurred since the date of the latest Record Check may be grounds for immediate termination of employment. This will depend on the nature of the criminal charge along with any mitigating circumstances relating to the failure to report.

COMPENSATION AND BENEFITS (EL-5)

Level 1 Statement:

With respect to employment, compensation and benefits for employees, contractors and volunteers, the CEO shall not cause or allow jeopardy to fiscal integrity.

Level 2 Statements:

Accordingly, the CEO shall not:

1. Change the CEO's own compensation and benefits.
2. Operate without periodic review with oversight by the Finance and Audit Committee to ensure that the compensation program falls within a reasonable range of competitive practices for comparable positions among similarly situated organizations. The CEO shall not operate outside the following Board-approved salary grid. The total for Regional Coaches is dependent on assured funding.

Position	2017-18 Grid		2018-19 Grid		2019-20 Grid		2020-21 Grid	
	Low	High	Low	High	Low	High	Low	High
Executive Director / CEO	71,800	100,600	72,500	101,600	73,250	102,600	74,000	103,650
Technical Directors/ Provincial Coaches	49,700	69,700	50,200	70,400	50,700	71,100	51,200	71,800
Program Managers	46,450	61,800	46,900	62,400	47,350	63,000	47,800	63,650
Program Coordinators	38,700	49,700	39,100	50,200	39,500	50,700	39,900	51,200
Administrative Assistants	35,350	43,450	35,700	43,900	36,050	44,350	36,400	44,800

3. Upgrade a position from Assistant to Coordinator, Coordinator to Manager or Manager to Director without informing the Finance and Audit Committee. Further, the CEO shall not cause the annual salary of a full-time staff member to increase by more than 5% per annum without the approval of the Finance and Audit Committee.
4. Create new full-time permanent employee positions without the approval of the Finance and Audit Committee.
5. Fill an existing position or create a new temporary position without posting the vacancy on the Curl BC web site and communicating the vacancy to all Curl BC Board members.
6. Operate without a comprehensive benefit program available to all full time staff and all full time contract personnel with a minimum of a one year contract to begin following a three month probationary period that includes the following benefits:
 - the Sport BC benefit package with plan premiums matched for eligible employees based on the following schedule:
 - a. three months after hire – premium costs 50% employer paid/50% employee paid;
 - b. after three years service – premium costs 75% employer paid/25% employee paid;
 - c. after five years service – premium costs 100% employer paid (except disability).
 - An optional RSP contribution plan for eligible employees with contributions matched on the following schedule:
 - a. three months after hire – contributions may be made but no employer matching;
 - b. after three years service – employer will match contributions to a maximum of 3% of annual salary;
 - c. after five years service – employer will match contributions to a maximum of 5% of annual salary.
 - an annual non-accumulating sick time benefit to eligible employees consisting of eight (8) sick days per fiscal year.
 - an annual vacation benefit to eligible employees that meets or exceeds the BC Employment standards by providing:
 - a. at hire – three weeks annual vacation pro-rated for months of service;
 - b. after 5 years service – four weeks annual vacation pro-rated for months of service;
 - c. after 10 years service – five weeks annual vacation pro-rated for months of service.
 - equipment use, staff parking, travel expenses, memberships and training at the discretion of the CEO in compliance with fiscal policies and regulatory reporting and taxation requirements.
 - the CEO's vacation benefits and Sport BC benefit plan employer contribution levels shall be separately negotiated within the CEO employment contract but in no case shall be less than those defined for other staff.
7. Provide honorariums and expenses for volunteers serving in the following capacities in excess of the amount approved by the Board:

- Chief Umpires at all provincial championships may be given an honorarium of up to \$200 plus accommodation, mileage and per diem expenses at the rate approved for Board members;
 - Provincial Head Statistician or the Head Statistician may receive accommodation, mileage and per diem expenses at the approved rate for Board members while at required events and may be given an honorarium of up to \$200 when acting as the Head Statistician at televised provincial championships;
 - Under special circumstances, the CEO has the authority to make an exception to these guidelines.
8. Provide honorariums and expenses for Ice Technicians serving in the following capacities in excess of the amount approved by the Board:
- If Curl BC appoints Ice Technicians for televised provincial championships:
 - The Head Ice Technician, if not normally employed by the host club, may receive up to \$300 per day including three days prior to the event for ice installation if the event is held in an arena and two days prior to the event for ice preparation if the event is held in the host curling centre;
 - The Head Ice Technician, if normally employed by the host club, may receive up to \$150 per day if the event is held in an arena and no reimbursement if the event is held in the host club;
 - The Assistant Ice Technician, if not normally employed by the host club, may receive up to \$100 per day including three days prior to the event for ice installation if the event is held in an arena and two days prior to the event for ice preparation if the event is held in the host curling centre.
 - If a host club requests the services of an ice technician not employed by the host club for a non-televised provincial championship, the CEO shall appoint and subsidize the provision of this ice technician at a cost not to exceed \$1,800, depending on the requirements, to assist with ice and rocks prior to and during the competition;
 - Under special circumstances, the CEO has the authority to make an exception to these guidelines.

CONFLICT OF INTEREST (BG–7 APPLIED TO STAFF)

The Board commits itself and its Governors (staff) to ethical, business-like, and lawful conduct and the proper use of authority.

As a Board of Governors (staff), we expect the following:

1. Governors (staff) shall not use their positions to obtain benefit or employment for themselves, family members, or close associates. Should a Governor desire to seek employment with Curl BC, he or she must first resign.
2. Governors (staff) shall not use information obtained through his or her position for personal gain.

3. Governors who may be directly or indirectly involved in a contract with Curl BC must declare that involvement at the Board meeting at which the question of the contract is first considered.
4. Governors (staff) shall disclose their involvement with other organizations, vendors, or any other associations that produce a conflict at each Board (staff) meeting and at any time during the year should their involvement change. A conflict is defined as a competing interest, influence or relationship which might impair or appear to impair a Governor's (staff member's) ability to perform his or her other duties and responsibilities objectively in the best interests of Curl BC.
5. There must be no self-dealing or any conduct of private business or personal services between any Governor (staff member) and Curl BC, except as procedurally controlled, to assure openness, competitive opportunity and equal access to inside information.
6. Governors (staff), who find themselves in an unavoidable conflict of interest when the Board (CEO) is to decide an issue, must declare that conflict immediately and absent themselves without comment from the discussion and the vote on the issue. Governors who declare their conflict of interest are included in determining a quorum. Governors who declare a conflict of interest will be included in the Minutes by name and shall be entitled to receive related Board decisions.

HARASSMENT (BG-APPENDIX 11)

Policy and Purpose

The purpose of this policy is to provide guidelines for dealing with discrimination and/or harassment complaints within Curl BC's system in an effective and timely manner, and to provide a procedure for informal and formal review and resolution.

In addition to the procedure available under this policy, every person who experiences discrimination or harassment has the right to:

- file a complaint with the BC Human Rights Commission if the alleged behavior falls within the definition of discrimination under the BC Human Rights Code;
- file a complaint with the police and/or other appropriate authorities if the alleged behavior constitutes criminal activity (i.e. abuse, stalking, etc.) and
- to pursue private proceedings in civil court

If a Complainant initiates proceedings under the BC Human Rights Code with respect to the same incident(s) that is/are the subject matter of a complaint under this policy, the Complainant shall be deemed to have withdrawn the complaint filed under this policy and the process under this policy will cease.

If a person proceeds with a complaint under this policy, the complaint will be resolved either informally, with the assistance of a Harassment Advisor, or formally after an investigation by an Investigation Officer.

If Abuse (defined in Section 2.1) of a child is suspected or disclosed, reporting to the appropriate authorities is mandatory and it should be reported to the police and/or the Child Protection Branch of the Minister of Children and Family Development.

Definitions

Abuse: Abuse can be physical, emotional, or sexual

- Physical abuse – using physical force or actions that result, or could result, in an injury
- Emotional abuse – a pattern of hurting an individual’s feelings to the point of damaging his or her self-respect. It includes verbal attacks on the individual, insults, bullying, humiliation, or rejection.
- Sexual abuse – using an individual for sexual stimulation or gratification unless, in the case of an adult, that individual consents

Appeal Panel: A panel appointed under Curl BC’s Appeals Policy.

Complaint: A written statement made by a Complainant seeking recourse pursuant to this policy.

Complainant: Individual(s) making a Complaint.

Discipline Committee: When required under this policy, the CEO or the Board Chair when the matter directly involves the CEO, shall appoint a Discipline Committee to receive the report of the Investigating Officer and undertake responsibilities defined in this policy.

- the Discipline Committee shall be comprised of three individuals. The CEO (Board Chair if the CEO is involved), in consultation with the Board Chair as required, shall decide who will be appointed;
- the Committee members shall have no significant relationship with the affected parties, shall have had no involvement with the incident which is the subject of the complaint, and shall be without any other actual or perceived bias or conflict;
- at least one of the Committee’s members shall be from among the Appellant’s peers;

Harassment: Any behavior that satisfies one or more of the following definitions of Harassment:

- Personal Harassment: Behavior, including communication, conduct or gesture, which:
 - is insulting, intimidating, humiliating, hurtful, malicious, degrading or otherwise offensive to an individual or group of individuals (including a statement with respect to a Prohibited Ground or otherwise; and
 - would be considered by a reasonable person to create an intimidating, humiliating, or uncomfortable work or sport-related environment
- Sexual Harassment: Behavior involving unwelcome sexual advances, requests for sexual favors or other communication (written or verbal) or physical contact of a sexual nature when
 - such conduct might reasonably be expected to cause embarrassment, insecurity, discomfort, offense, or humiliation to another person or group; or
 - submission to such conduct is made, implicitly or explicitly, a condition of employment or participation in a sport-related activity; or
 - submission to or rejection of such conduct is used as a basis for any employment or sport-related decision; or

- such conduct has the purpose or the effect of interfering with a person's work or sport performance or of creating an intimidating, hostile, or offensive work or sport environment.
- Retaliation: Any action taken against an individual in retaliation for:
 - having initiated this policy on behalf of himself/herself or another individual;
 - having participated or cooperated in any investigation under this policy;
 - having associated with anyone who has invoked this policy or participated in an investigation.

Types of behaviour that may constitute Harassment include, but are not limited to:

- written or verbal abuse or threats
- physical assault
- unwelcome remarks, jokes, innuendoes, or taunting about a person's body, sexual orientation, attire, age, marital status, ethnic or racial origin, or religion
- displaying of racist or other offensive or derogatory material, racial, ethnic, or religious graffiti
- practical jokes which cause awkwardness or embarrassment, endangering a person's safety or negatively affecting performance
- hazing or initiation rites
- obscene gestures
- intimidation
- behaviour which undermines self-respect or adversely affects performance or working conditions
- false accusations of Harassment motivated by malice or mischief and meant to cause other harm

Harassment Advisor: A designate of Curl BC who has been trained in respect of this policy and its procedures. The role of the Harassment Advisor is to serve in a neutral, unbiased capacity, to provide information about the resources and support available, and to receive Complaints, assist in informal resolution of Complaints, and to make recommendations for further action. The Harassment Advisor will handle Complaints that may be resolved through informal procedures and will refer all other Complaints to the Investigation Officer.

Investigation Officer: An individual appointed by Sport BC at the request of Curl BC to investigate a Harassment Complaint as provided in this policy.

Investigative Report: The draft or final report by the Investigation Officer prepared following an investigation, including, but not limited to, a summary of details, determination of whether or not Harassment has occurred, and recommendations for resolution, including recommendations for disciplinary action.

Prohibited Ground: The BC Human Rights Code provides that no person shall discriminate against another person with respect to, among other things, employment, publications, accommodation, service and facilities, on any of the following grounds (the "Prohibited Grounds"):

- age
- ancestry

- colour
- conviction for an offense unrelated to employment
- family status
- marital status
- mental disability
- physical disability
- place of origin
- political belief
- race
- religion
- sex
- sexual orientation

Reasonable Person Standard: In relation to a determination of Harassment under this policy, an assessment of responsibility that takes into account not only what the Complainant and Respondent actually experienced, knew, or understood about one another or the situation, but also what a reasonable person in each of their circumstances would or ought to have experienced, known, or understood.

Respondent: the alleged offender

Responsible Adult: Where the Complainant or the Respondent is a minor (under 19 years of age) or is otherwise unable to speak for himself or herself, a parent, guardian, or other adult of the person's choice who may speak on behalf of the Complainant or Respondent as defined in this policy.

Statement of Principles

- 1) Curl BC does not tolerate Harassment in connection with any of its internal or external business, sport or related activities.
- 2) Curl BC is committed to providing an environment in which all individuals are treated with respect and dignity. Each individual has the right to participate and work in an environment that promotes equal opportunities and prohibits discriminatory practices.
- 3) This policy applies to all employees, governors, officers, volunteers, coaches, athletes, participants, officials, members, and persons with an employment contractual relationship with Curl BC. Curl BC encourages the prompt reporting of all incidents of Harassment, regardless of who the alleged offender may be.
- 4) For the purposes of this policy, Harassment may occur:
 - at sporting events, competitions, or training sessions;
 - at the office;
 - at office- or sport-related social functions;
 - at Curl BC's business or sport functions, such as meetings, conferences, training sessions, and workshops;
 - during work- or sport-related travel;

- via the telephone, electronic and/or other telecommunication devices; and/or
 - elsewhere if the person harassed is there as a result of work- or sport-related responsibilities or a work- or sport-related relationship.
- 5) The procedure followed under this policy shall conform to the process of natural justice, which means that:
- the Respondent and Complainant will be advised of the provisions of this policy;
 - the Respondent and Complainant will be given an opportunity to present evidence in support of his/her position and to defend himself/herself against allegations of Harassment;
 - the issues will be clearly and concisely stated so that the Respondent is aware of the allegations;
 - the Respondent and Complainant will have the right to be represented at any stage of the process at his/her own expense;
 - the Respondent and Complainant will receive a copy of the Investigation Report;
 - the Respondent and Complainant have the right to an appeal pursuant to Section 8 of this policy;
 - the decision-makers have a duty to listen fairly to both sides and to reach a decision untainted by bias;
- 6) Curl BC is committed to the prevention of Harassment through educational programs including information and training.
- 7) Disciplined training is an indispensable part of high performance sport and should not be confused with discrimination or Harassment. However, it is of vital importance that those in authority:
- set and communicate performance and training standards to all participants;
 - ensure that training involving touching or other physical contact occurs in an appropriate setting and only after informed consent, where practicable, has been sought and received;
 - show consistency and non-harassment when taking any corrective or punitive action;
 - use non-harassing terminology, address individuals by name and avoid the use of derogatory, slang or offensive terms;
 - refer to and follow Curl BC's Codes of Conduct accurately.
- 8) In the interest of all parties concerned, the formal resolution of a Complaint under this policy (including an appeal) should proceed as expeditiously as possible within the specified time limits. However, failure to meet the specified time limits will not invalidate the complaint process.
- 9) Employees or members of Curl BC against whom a complaint of Harassment is substantiated may be severely disciplined up to and including employment dismissal or termination of membership.

Responsibilities

- 1) Curl BC is responsible to:

- ensure that all of its members, governors, officers, employees, persons under an employment contract, volunteers, coaches, athletes and officials are familiar with this policy;
 - appoint trained Harassment Advisors;
 - pay for any costs associated with processing a substantiated Complaint;
 - ensure a fair and impartial Discipline Committee;
 - impose disciplinary or corrective measures in a fair and timely manner, taking into account the recommendations made by the Discipline Committee.
- 2) Sport BC (viaSport?) is responsible to:
- provide awareness and educational opportunities to the amateur sport and recreation community generally regarding harassment policies;
 - provide a training program for Harassment Advisors;
 - at the request of Curl BC, appoint an Investigation Officer to investigate a Complaint;
 - monitor the Investigation Officer to ensure that his or her investigation, filings, and reports are conducted according in a professional manner to the policy;
 - receive a copy of the Final Investigation Report and provide copies to the Discipline Committee, the Complainant and Respondent;
 - keep a confidential copy of all materials received by Sport BC in relation to a Complaint;
 - where a Complaint is substantiated, provide a summary of the decision (without identifying the parties) to Sport BC's members; and
 - keep a record of the summary decision for future reference

Jurisdiction

- 1) A Complaint may be lodged by any person against any employee, governor, officer, volunteer, coach, athlete, official, member of, or person under an employment contract with Curl BC.
- 2) A person may initiate a Complaint under this Harassment policy if:
 - the Complaint alleges that the Respondent has committed an act of Harassment as defined in this policy; and
 - the Respondent is an employee, governor, officer, volunteer, coach, athlete, official, member of, or person under an employment contact with Curl BC; and
 - the Complaint is initiated within one year of the incident (or last in a series of incidents) giving rise to the Complaint. If the Complainant is a minor, the one year term commences when the parent or guardian of the minor is made aware of the incident or last in a series of incidents from herein referred to as "the Minor's Limitation Period"; and
 - the Harassment Advisor determines that the subject matter of the complaint is appropriately dealt with under this policy rather than an alternate, internal complaint process of Curl BC.

Confidentiality

- 1) Subject to any limits or disclosure requirement imposed by law or required by this policy, any and all information, oral and written, created, gathered, received, or compiled through the course of processing a Complaint is to be treated as confidential by both the Respondent and

Complainant, their representatives, witnesses, and all persons dealing with the Complaint pursuant to this policy.

Complaint Procedure

- 1) The Complainant is encouraged to make it known to the Respondent that the behavior is unwelcome, offensive, and contrary to this policy.
- 2) A Complaint is initiated under this policy by delivering a written statement to the Harassment Advisor of Curl BC seeking recourse under this policy.
- 3) If Curl BC does not have a Harassment Advisor who can deal with the complaint expeditiously, the Executive Director should consult with the Sport BC Harassment Coordinator to appoint an appropriate Harassment Advisor.
- 4) At the first meeting (either in person or via telephone) between the Harassment Advisor and the Complainant, the Harassment Advisor shall provide the Complainant with a copy of Curl BC's Harassment policy and inform the Complainant of the following:
 - the overall process of making and processing a Complaint;
 - the option of pursuing informal resolution of the Complaint;
 - the option to proceed with a formal investigation under this policy when an informal resolution is inappropriate or not feasible;
 - the availability of counseling and other resources;
 - the confidentiality provisions of this policy;
 - the right to be represented by a person of his/her choice (including legal counsel) and at his/her own expense at any stage in the Complainant process;
 - other avenues of recourse, including the right to file a complaint pursuant to the BC Human Rights Code, or, where appropriate, to contact the police where the conduct may be an offense pursuant to the Criminal Code, or pursue private proceedings in civil court; and
 - the fact that discipline may be imposed on the Complainant if it is found that the Complainant is frivolous or vexatious.
- 5) Following the initial meeting between the Complainant and the Harassment Advisor:
 - if the Complainant and the Harassment Advisor agree that the conduct does not constitute Harassment under this policy, the Harassment Advisor will take no further actions and will make no written record of the Complaint;
 - if the Complainant wishes to proceed with the Complaint, the Harassment Advisor shall assist the Complainant in preparing a written statement outlining the name of the Respondent, the details of the alleged incident(s) of Harassment, and the names of any witnesses (the Complainant's Statement") The Complainant's Statement shall be dated and signed by the Complainant.
- 6) Upon receipt of the Complainant's Statement by the Harassment Advisor, the Harassment Advisor shall either:
 - process the Complaint in accordance with this policy or
 - reject the Complaint on the basis that:

- the facts alleged in the Complainant's Statement, if proven, would be insufficient to establish Harassment under this policy; and/or
 - the subject matter of the Complaint is frivolous or vexatious, made for an improper purpose, or otherwise not made within the spirit of the this policy; and/or
 - the subject matter of the Complaint falls within the jurisdiction of another internal policy of Curl BC or jurisdiction of an external authority
 - if the Complainant has initiated a complaint under any other internal or external complaint process related to the incident which is the subject matter of a Complaint under this policy, the Discipline Committee Chair may hold the Complaint in abeyance until the other external or internal process is completed.
- 7) In the event that the Harassment Advisor rejects the Complaint, the Complainant may appeal the Harassment Advisor's decision to the Discipline Committee. The Committee may either confirm the rejection of the Complaint or allow the Complaint to proceed. The Discipline Committee's decision with respect to this issue shall be final and binding.
- 8) If the Complainant wishes to attempt resolution of the Complaint on an informal basis, the Harassment Advisor will attempt informal resolution of the Complaint. This may include the following:
- the Complainant talks to the Respondent about the behavior;
 - the Harassment Advisor talks to the Respondent about the behavior;
 - the Harassment Advisor acts as an informal mediator between the Complainant and the Respondent;
 - the Harassment Advisor accesses the services of a professional mediator for the Complainant and the Respondent;
 - other types of informal resolution that do not include an investigation
- 9) If the Complaint is resolved informally to the satisfaction of the Harassment Advisor, the Complainant, and the Respondent, or if the Complainant decides to withdraw the Complaint, the Harassment Advisor will make careful notes of the actions taken and no report shall be submitted to the Discipline Committee.
- 10) If the Complaint is not resolved informally to the satisfaction of the Harassment Advisor, the Complainant, and the Respondent, the Complaint shall be referred to an Investigation Officer for investigation.
- 11) The Discipline Committee may impose interim measures pending the recommendations of the Investigation Officer if it is of the opinion that the imposition of such measures is in the best interests of Curl BC.
-
- 12) Interim measures are not sanctions and may take many forms including, but not limited to
- the imposition of conditions upon the continued participation of the Respondent in the activities or business of Curl BC;
 - suspension of the Respondent from participation in the activities or business of Curl BC, with or without pay, pending completion of the investigation; or
 - such other conditions as the Discipline Committee determines necessary

- 13) Any interim measures imposed by the Discipline Committee shall be reconsidered no less than 30 days after being imposed, and shall be reconsidered each successive 30 day period thereafter.
- 14) At the time the Complainant's Statement is forwarded to the Investigation Officer, a copy of the Complainant's Statement shall be placed in Curl BC's confidential records relating to the Respondent.
- 15) When the Investigation Officer receives the Complainant's Statement from the Harassment Advisor, the Investigation Officer will review and clarify the Complainant's Statement and give a copy of the Complainant's statement to the Respondent
- 16) Where the Investigation Officer gives a copy of the Complainant's Statement to the Respondent, the Investigation Officer will include with the Complainant's Statement a copy of this policy and a notice that the Respondent has the right to be represented by any person of his/her choice at any stage of the process when the Respondent is required or entitled to be present.
- 17) The Respondent may provide a written statement in response to the Complainant (the "Respondent's Statement") to the Investigation Officers within fourteen (14) days of receiving the Complainant's Statement. If there are special circumstances, the Investigation Officer may extend the time for response.
- 18) The Investigation Officer shall forward a copy of the Respondent's Statement to the Complainant.
- 19) In a timely manner, the Investigation Officer shall conduct an investigation as to the facts and circumstances relevant to the Complaint.
- 20) During the investigation, the Complainant shall and the Respondent may advise the Investigation Officer of all evidence that is relevant to the Complaint. The Investigation Officer shall attempt to obtain written, signed statements from all relevant witnesses.
- 21) Upon completion of the investigation, the Investigation Officer shall prepare a draft Investigation Report (the "Draft Investigation Report").
- 22) The Draft Investigation Report shall contain:
 - a summary of the relevant facts;
 - a determination as to whether the acts in question constitute Harassment as defined in this policy;
 - if the act(s) constitute Harassment, recommendations for resolution which may include disciplinary action against the Respondent;
 - if the act(s) do not constitute Harassment, recommendations to dismiss the Complaint.
- 23) When recommending disciplinary action against the Respondent, the Investigation Officer shall consider factors such as:

- the nature of the Harassment;
 - whether the Harassment involved any physical contact;
 - whether the Harassment was an isolated incident or part of an ongoing pattern;
 - the nature of the relationship between the Complainant and the Respondent;
 - the ages and mental abilities of the Complainant and/or Respondent;
 - whether the Respondent had been involved in previous Harassment complaints;
 - whether the Respondent retaliated against the Complainant.
- 24) In addition to recommendations for discipline against the Complainant or the Respondent, the Investigation Officer may recommend any other measures he/she considers appropriate in the circumstances. Such recommendations shall be made in writing and will be supported by reasons.
- 25) Upon completion of the Draft Investigation Report:
- the Investigation Officer shall provide the Complainant, the Respondent and the Harassment Advisor with a copy of the Draft Investigation Report; after which
 - the Complainant shall have seven (7) days from receipt of the Draft Investigation Report to provide the Investigation Officer with any written comments with respect to the Draft Investigation Report (the “Complainant’s Response”); after which
 - the Investigation Officer shall provide the Respondent with a copy of the Complainant’s Response, if any; after which
 - the Respondent shall have seven (7) days from receipt of the Complainant’s Response to provide the Investigation Officer with any written comments with respect to the Draft Investigation Report (the “Respondent’s Response”); after which
 - the Investigation Officer shall provide the Complainant with a copy of the Respondent’s Response, if any; after which
 - the Complainant shall have seven (7) days of receipt of the Respondent’s Response to provide the Investigation Officer with a reply to the Respondent’s Response, if any.
- 26) After receiving Responses and replies from the Complainant and the Respondent and conducting such follow-up investigation as necessary, the Investigation Officer shall finalize the Investigation Report and forward a copy of the final Investigation Report (the “Final Investigation Report”) to the Harassment Advisor. The Harassment Advisor shall distribute copies of the Final Investigation Report to the Complainant, the Respondent, and the Chair of the Discipline Committee.
- 27) The Discipline Committee shall consider the Final Investigation Report and make a determination as to whether the Respondent committed acts of Harassment pursuant to this policy.
- If the Discipline Committee determines that the Respondent committed Harassment, it shall recommend to the Curl BC Board of Governors such resolution or disciplinary action to be taken against the Respondent as is appropriate in the circumstances.
 - If the Discipline Committee determines that the Respondent did not commit acts of Harassment, it shall dismiss the Complaint.

- 28) When recommending disciplinary action, the Discipline Committee shall consider the factors referred to in Section 23, and may recommend such action as it considers appropriate under the circumstances which may include, by is not limited to:
- no action;
 - a verbal apology;
 - a written apology;
 - a letter of reprimand from Curl BC;
 - referral to counseling;
 - sensitivity training in Harassment issues;
 - removal of certain privileges of membership or employment;
 - demotion or pay cut;
 - temporary suspension with or without pay;
 - termination of employment;
 - expulsion from membership.
- 29) The Discipline Committee may recommend any other measures it considers appropriate in the circumstances. Such recommendations shall be made in writing and supported by reasons.
- 30) The Discipline Committee shall, not more than fourteen (14) days after it makes its decision and recommendation, send a copy of its decision to the Complainant, the Respondent, the CEO (or Curl BC's Board Chair if the Complaint concerns the Executive Director), the Board Chair, the Investigation Officer and the Harassment Coordinator.
- 31) After completion of its duties, the Discipline Committee shall turn over to Curl BC all copies of the Final Investigation Report and other materials related to the Complaint.
- 32) In making findings of fact relating to whether Harassment has occurred, the Discipline Committee will use a standard of proof being a balance of probabilities.
- 33) If the Respondent withdraws from the Complaint process or chooses not to participate in the process, the process (including an appeal) may proceed based solely on the Complainant's testimony and supporting evidence and disciplinary measures may be imposed on the Respondent in his or her absence.
- 34) If the Complainant withdraws from the process or chooses not to participate in the process, the process (including an appeal) may either
- be dismissed; or
 - proceed based solely on the Respondent's testimony and supporting evidence in which case disciplinary measures may be imposed on the Complainant in the Complainant's absence.
- 35) The Board of Governors may suspend a Respondent from membership in Curl BC without notice for failure or refusal to comply with any disciplinary action determined under this policy.
- 36) Notwithstanding the procedures set out in this policy, any employee, governor, officer, volunteer, coach, athlete, participant, official, or person under an employment contract with

Curl BC who has been charged with one or more criminal offenses that constitute Harassment under this policy may be temporarily suspended from his or her relationship with Curl BC or from participating in any Curl BC activities until further notice, whether or not a Complaint has been received or an investigation has been completed pursuant to this policy.

- 37) Notwithstanding the procedures set out in this policy, any employee, governor, officer, volunteer, coach, athlete, participant, official, or person under an employment contract with Curl BC who, while in that capacity, is convicted of one or more criminal offenses involving conduct that constitutes Harassment under this policy shall be automatically suspended from participating in any and all activities of Curl BC for an appropriate length of time determined by the Board of Directors having regard to:
- the seriousness of the incident(s); and
 - the length of sentence imposed in the criminal proceeding, if any.

Appeals

- 1) A Complainant or Respondent who wishes to appeal the decision of the Discipline Committee may initiate an appeal following the procedure defined in Curl BC Appeals Policy.

Representation by Responsible Adults

- 1) If the Complainant is a minor, or someone otherwise unable to speak for himself or herself, the Complaint may be brought forward by a “Responsible Adult”. The Responsible Adult will have the right to act on behalf of the Complainant throughout the complaint process, including
- making a Complaint
 - receiving all notices on behalf of the Complainant
 - being present at all dealings with the Complainant
- 2) If the Respondent is a minor, or someone otherwise unable to speak for himself or herself, the following shall apply:
- If the Harassment Advisor is attempting an informal resolution of a complaint, the Harassment Advisor may speak to the Respondent directly concerning the Complaint, provided that prior to speaking to the Respondent, the Harassment Advisor shall have informed the Respondent that he/she may have a Responsible Adult present during the meeting.
 - If the Complaint is referred to an Investigation Officer for investigation:
 - a copy of the Complainant’s Statement shall be forwarded to a parent or guardian of the Respondent if such person is known
 - the Respondent shall be advised that he/she has the right to be represented by a Responsible Adult
 - the Respondent’s designated Responsible adult will have the right to act on behalf of the Respondent throughout the investigation process, including
 - responding to the Complainant’s statement
 - assisting the Respondent to prepare a Respondent’s Statement
 - receiving all notices on behalf of the Respondent
 - being present at all dealings with the Respondent

Records

- 1) The Curl BC CEO shall be responsible for ensuring that all records required to be kept under this policy, including the Harassment Advisor's reports are kept in confidence.
- 2) Where a Complaint is resolved informally without investigation:
 - the Harassment Advisor shall provide the CEO with a confidential written record of the Complaint and details of the informal resolution;
 - no reference to the incident shall be recorded in Curl BC's records relating to the Respondent.
- 3) All Harassment Advisors shall have access to the confidential written record and the Final Investigation Report(s) for the purposes of carrying out the duties of a Harassment Advisor under this policy.
- 4) If the Complaint is not resolved informally and the Complaint is referred to an Investigation Officer for investigation, a copy of the Complainant's Statement relating to the Respondent shall be placed in Curl BC's confidential records at the time the Complainant's Statement is forwarded to the Investigation Officer.
- 5) Where an Investigation Report results in a finding of Harassment, the outcome of the investigation and any decisions of the Discipline Committee relating to the Respondent shall be recorded in Curl BC's confidential records. The records shall include copies of the Complaint, the Investigation Report, the Discipline Committee report and, if applicable, the Appeal Panel's decision.
- 6) Where an investigation results in a finding that the Complaint is not substantiated, all records of the Complaint relating to the Respondent shall be removed from Curl BC's records.

Review

- 1) This policy shall be reviewed by Curl BC's Governance and Strategic Planning Committee as deemed necessary by its chair but no less frequently than every 3 years.

Suggested Guidelines for the Prevention of Harassment

- 1) Include information on abuse and harassment as part of orientation to new members and volunteers including the current Harassment policy and Sportsafe materials. Sample educational materials are available through Curl BC, Sport BC, Promotion Plus, and the Coaches Association of BC and can be found on Sport BC's website: www.sport.bc.ca.
- 2) Include compliance with policy as part of membership and employment eligibility.
- 3) Support and distribute information concerning educational workshops/seminars explaining the policy and process as part of annual meetings, volunteer training, athlete camps and/or wherever else it is deemed appropriate.
- 4) Actively participate in a recognized educational module on volunteer/staff screening.

WHISTLEBLOWING

The purpose of this *Whistleblowing Policy* is to encourage and enable Curl BC participants* and members of the public to report questionable activity concerning financial or operational matters, pertaining to Curl BC, without fear of reprisal.

Participants have a duty to report any activity which:

- a) They believe contravenes the law;
- b) Represents a real or apparent conflict of interest or a breach of a Curl BC policy, including the ethics policy or the policy and guidelines on discrimination and harassment;
- c) Represents a misuse of Curl BC's funds or assets; or
- d) Represents a danger to public health, safety, and/ or the environment.

This policy provides direction regarding the process for reporting questionable activity and the treatment of such reports.

RATIONALE

Curl BC is committed to maintaining a high standard of public trust and confidence from its stakeholders. As a result, Curl BC requires the observation of high standards of business and personal ethics in the conduct of the duties and responsibilities.

All Curl BC participants have an obligation to report questionable activity regarding financial or operational matters, including violations of federal or provincial law, and violations of Curl BC's policies.

APPLICABILITY

This Whistleblowing Policy applies to all Curl BC participants* at all times, during the course of their work in sport and also during other activities where their conduct may affect the work and sport environment, whether that be at Curl BC offices, at meetings of Curl BC or other entities at Games or at any other location, whether in BC or out-of-province.

*Curl BC participants include all persons engaged in any paid or volunteer capacity with Curl BC or otherwise under the jurisdiction of Curl BC. Without limiting the reach of this policy, Curl BC participants include:

1. Curl BC Governors, officers, members and volunteers;
2. Curl BC employees and persons under contract with Curl BC;
3. All athletes eligible for nomination to, or forming part of, any team participating in curling competitions over which Curl BC has jurisdiction; and
4. All persons working with those teams or athletes, including coaches, medical and paramedical personnel, sport association representatives, and other support persons.

The Whistleblowers

Concerns should be reported using Curl BC's prescribed procedures for filing reports, though written reports in other forms are permitted. Curl BC may also initiate a written report on behalf of an anonymous Whistleblower when warranted.

It is the policy of the Curl BC:

1. To treat all reported incidents in a confidential manner and with due care to the extent possible, consistent with the need to conduct an adequate investigation. A Whistleblower may provide a report anonymously. Curl BC will make its best efforts to protect the identity of a Whistleblower;
2. That all parties to an investigation will be treated fairly.

Reprisals

It is the policy of Curl BC that any person who reports a concern in good faith will not be subject to reprisal or other adverse consequences as a result of submitting a report.

Any Curl BC participant who retaliates against someone who has reported a concern in good faith will be subject to sanctions. Any participant who is found to be in violation of this policy (e.g. harassment of the Whistleblower) shall be sanctioned.

Any Curl BC participant who has reasonable grounds to believe that a reprisal has been taken against him or her may file a complaint under Curl BC's Harassment Policy and the complaint will be investigated as if the alleged reprisal was a breach of that policy.

None of the protections afforded to a Whistleblower under this policy shall apply to protect a person who intentionally makes false accusations. Curl BC may sanction a participant in such circumstances.

Procedure

A concern can be reported in confidence using Curl BC's online Whistleblower Form – <https://www.curlbc.ca/wp-content/uploads/2020/01/Curl-BC-Whistleblower-Reporting-Procedure.pdf>.

The Whistleblower Form will be sent to the CEO for review and assessment (or to the Board Chair if the report pertains to the CEO).

A Whistleblower Form which raises a potential breach pertaining to Curl BC's Harassment Policy will be dealt with in accordance with that Policy. The CEO will have the authority to retain outside counsel, accountants, investigators and other resources deemed necessary to conduct a full and complete investigation of the concern.

The CEO may also refer a matter to a more appropriate authority (i.e. WADA, RCMP, local police).

If wrongdoing is found, appropriate remedial actions will be taken and/or sanctions imposed.

Except when a report is anonymous, the Whistleblower will be advised once the review and/or investigation of a matter has been completed, and if warranted may be provided information about the outcome.

In any year in which a concern has been reported, the CEO will be advised. The CEO will exercise his or her judgment as to whether the Board Chair needs to be advised. The CEO will advise the Board Chair on a monthly, bi-annual or annual basis as to how many complaints were received, and if any were founded.

Questions relating to this Whistleblowing Policy should be directed to the CEO.

WORK PLANS AND PERFORMANCE APPRAISALS (PERFORMANCE DISCUSSION PROCESS)

Each employee will be responsible for developing their respective work plan for the year within the context of Curl BC's operational plan. At a minimum, at the end of the season, the CEO and employee will review the objectives and the results achieved. Throughout the year, the employee and CEO may refer to this document to track progress made toward objectives, highlight areas of concern and indicate challenges identified along the way.

Performance discussion should occur throughout the year and take the form of coaching or advice as required/requested. In April, a meeting should take place to review successes and challenges from the preceding year, and to establish the objectives for the coming year. This would also be the opportunity for either party to identify and recommend professional development opportunities which may assist the employee in their day-to-day work or to grow within the organization. Once complete, both parties shall sign off on the final document and it shall be added to the employee's personnel file.

The Performance Review Template is available at "S:\CAPACITY BUILDING\3.8 STAFF\Performance-Review-Template 2017.docx"

TERMINATION OF EMPLOYMENT

As indicated in employee's Employment Agreement.

HOURS OF WORK AND SCHEDULED BREAKS

The regular office hours are 9:00am to 4:30pm, Monday through Friday inclusive (excluding holidays) with flexibility provided to help reduce commuting time, cover family duties, etc.. All employees are expected to work 7 hours per day (35 hours per week) exclusive of an unpaid eating break of at least thirty (30) minutes. Employees may also be expected to work such other hours as may be requested or required, from time to time. Employees hired on a part-time basis will have **schedules** determined on a case-by-case basis.

Employees are required to notify the CEO and the rest of the office staff, in advance, of planned days away from the office. Unplanned absences from the office should be reported to the CEO as soon as could reasonably be expected. At the discretion of the CEO and depending on circumstances, employees may be allowed to work from home for specific periods of time.

PROBATION

All employees begin with Curl BC on a probationary period unless otherwise stated and detailed in their Employment Agreement. Typically, a minimum three (3) months probationary period will be standard at Curl BC. During this time, performance and suitability will be monitored and evaluated. If Curl BC decides the employee is unsuitable for the employment offered; performance is unsatisfactory; or unwilling or unable to properly carry out any of your duties, then Curl BC has the right to terminate employment at any time during the probationary period, given the appropriate notice outlined by BC's Employment Standards and the Employment Agreement.

OVERTIME

CEO

Through his or her individual Employment Agreement with Curl BC, the CEO recognizes that the nature of his or her job shall require him or her to work additional hours without additional compensation. In recognition of this fact, the CEO is allotted additional holiday time as per his or her contract.

Managers/Staff

Managers/staff are not eligible for compensation for hours worked in excess of their regular hours of work. They are expected, where possible to flex their hours or take time off in lieu of overtime. Approval by the CEO must be obtained in advance.

Staff will maintain up-to-date record of the hours they work each day in the staff's section of Curl BC's shared drive. It is not the Curl BC's policy to pay employees for overtime worked. Employees shall make every reasonable effort to use their lieu time in a timely manner as it is earned in order to avoid accumulating large numbers of hours. Any overtime worked and not taken in lieu will be paid out in the event that the employee resigns or is terminated.

STATUTORY HOLIDAYS

The following chart depicts the eligible statutory holidays are in accordance with the Employment Standards Act of BC. Employees who qualify for statutory holiday pay shall receive the following statutory holidays with pay:

Entitled Statutory Holidays: New Year's Day, Family Day, Good Friday, Easter Monday, Victoria Day, Canada Day, BC Day, Labour Day, Thanksgiving, Remembrance Day, Christmas Day and Boxing Day.

TRAVEL EXPENSES

Employees traveling on behalf of Curl BC will be reimbursed for all travel at the following rates:

Use of own car: \$0.43 per kilometer, including applicable taxes

Meal Allowance: \$44.00 per day (\$10/breakfast, \$14/lunch, \$20/dinner)

Airfares: When booking travel, all Curl BC staff must use the most economical airfare available (or Aeroplan points if available). Any deviation from this policy must be justified on

the applicable expense claim or approved by the CEO. Employees are required to use Curl BC's TD VISA card whenever possible.

Other expenses: Receipts must be submitted before reimbursement can be made. (i.e.: hotel bills, taxi and parking receipts, etc.)

PREGNANCY LEAVE & PARENTAL LEAVE

http://www.bclaws.ca/Recon/document/ID/freeside/00_96113_01#section50

<HTTPS://WWW2.GOV.BC.CA/GOV/CONTENT/EMPLOYMENT-BUSINESS/EMPLOYMENT-STANDARDS-ADVICE/EMPLOYMENT-STANDARDS/GUIDE-TO-THE-EMPLOYMENT-STANDARDS-ACT>

BEREAVEMENT LEAVE

Curl BC will grant up to three paid working days per event on the occasion of a death in the staff member's immediate family. Immediate family is defined as: parent(s), step parent(s), foster parent(s), sibling(s), grandparent(s), spouse (including common law a/o same sex partner), step child(ren) or ward of the staff member, father-in-law or mother-in-law (including parent of same sex partner).

Additional compassionate leave may be granted at the discretion of the CEO.

PROTECTED UNPAID LEAVE

The rules regarding seniority, vacation accumulation and health benefits while on protected unpaid leave can be found in the regulations within BC's Employment Standards Act.

NON-PROTECTED UNPAID LEAVE

Employees may be granted unpaid leave with the written consent of the CEO. During periods of non-protected, unpaid leave, medical, dental, life and AD&D coverage shall be suspended, vacation accrual shall cease and length of service shall be interrupted. Matching contributions to the group RRSP will also cease. Every attempt will be made to return employees to a position of equal responsibility on return from leave, however, no guarantees exists that the exact position left will be available on return.

VOTING LEAVE

Curl BC is committed to protecting the right of each employee to exercise his or her democratic right to vote on election days and to act in compliance with Federal and Provincial regulations guaranteeing time off work for these purposes.

Business requirements will be reviewed and schedules established to ensure that each staff member has a window of 4 hours off work during polling hours on an election day for voting purposes.

If an employee's regular schedule already provides for such a window of time during polling hours, this employee will be required to work his or her hours as usual. In the event that an employee is granted time off during their regularly scheduled hours of work, this time shall be granted off with pay to ensure that voting does not negatively affect his or her compensation.

CONFLICT/DISPUTE RESOLUTION:

Regrettably, conflict can occur in any working environment. In an effort to resolve conflict in an expedient, yet fair manner, Curl BC recommends the following process for conflict or dispute resolution:

- Speak to the person you are having the dispute with. Many times disputes arise due to misunderstandings and miscommunications.
- If speaking to the individual does not work, speak to the CEO. The CEO may arrange a meeting between those involved in the dispute, to determine a resolution.
- If the CEO is unable to resolve a workplace dispute, the parties may be referred by the CEO to mediation by an outside third party. The resolution of the mediator is binding on both parties of the dispute.

This policy is implemented at the discretion of management and does not supersede the termination provision in the employee's Employment Agreement.

DRUGS & ALCOHOL

When a Curl BC staff member's position requires work to be completed outside of regular business hours (9:00 am – 4:30 pm local time), he or she shall not consume alcohol or any other debilitating substance to a level which would reasonably be expected to impair the staff members ability to perform his or her duties competently, cause impairment in the staff members ability to speak, walk or drive, or cause him or her to perform in a disruptive manner.

An employee who is using prescription or "over the counter" drugs which may impair work performance must report this to his/her manager.

Any Curl BC employee while at the workplace, regardless of whether they are on or off duty, and who is found to be using illicit drugs and/or in possession of illicit drugs will be turned over to the local Police Service or applicable law enforcement agency. The Police Service will therefore be contacted regarding any illicit drug use by staff. Criminal charges or further prosecution will be up to the court of law.

The adherence to this policy is expected as part of the employee's acceptance of the terms and conditions of involvement with Curl BC and is not in any way designed to infringe on their individual rights.

Any employee who fails to adhere to this policy may be subject to discipline up to and including termination.

Cannabis Policy

Intent

Curl BC (the "Employer") is committed to safeguarding the health and safety of its employees and the public by providing a safe and healthy work environment.

In light of cannabis legalization across Canada effective October 17, 2018, Curl BC wishes to communicate clear guidelines and rules on recreational cannabis use, misuse, and abuse in relation to the workplace.

It is also recognized that the use of certain prescription medications, including medical cannabis, can impair a person's ability to safely and effectively perform their job.

Accordingly, the purpose of this Policy is to set out the Employer's expectations with respect to fitness for work, as well as its obligations and expectations with respect to providing appropriate accommodations to employees who are dealing with substance abuse or dependence problems, or who are medically required and legally authorized to use medical cannabis.

Definitions

"cannabis" means all forms of cannabis, including but not limited to cannabis flowers, leaves, oils and edibles.

"employees" means anyone in an employment relationship with Curl BC, any dependent or independent contractors, and anyone attending the Employer's work site for work-related purposes.

"fit(ness) for duty" means the individual is fit to perform assigned tasks competently, safely, and in a manner that does not compromise or threaten the safety or health of that person or others, the environment, or property.

"impairment" means a state of being under the influence of drugs, whether legal or illegal. Signs of impairment may include glassy or red eyes, unsteady gait, slurring and poor coordination.

"medical cannabis" means cannabis that has been medically and legally authorized by a qualified health care practitioner as defined by the *Access to Cannabis for Medical Purposes Regulations*, as amended from time to time, or any applicable successor legislation.

"safety-sensitive duties" are those that could have a direct and substantial impact on the health and safety of the employee, other workers, customers, visitors, the public, property or the environment.

Application

This Policy applies to all employees as follows:

- During work hours, including work breaks;
- During non-work hours where there is a potential impact on the Employer's reputation or interests;
- While conducting business or otherwise performing duties for the Employer, including travelling for work purposes;
- While on Employer property;
- While operating a company vehicle; and
- Whenever an employee is representing the Employer.

Guidelines

Subject to limited exceptions for medical cannabis, Ontario's *Cannabis Act, 2017* prohibits the consumption of cannabis in the workplace. Employees must abide by this and all other

applicable statutory requirements, including those that pertain to the possession and use of cannabis.

Employees are expected to use medical cannabis and other prescription and over-the-counter medications safely and responsibly.

All workplace parties will adhere to applicable statutory requirements, as amended from time to time, including under the:

- *Occupational Health and Safety Act*
- *Smoke Free Ontario Act, 2017* or similar legislation in other jurisdictions
- *Human Rights Code*
- *Ontario Cannabis Act, 2017* or similar legislation in other jurisdictions
- *Access to Cannabis for Medical Purposes Regulations*

This Policy will be interpreted so as to be in compliance with all applicable laws, including the above-noted acts.

Any questions related to the content of this Policy or its interpretation should be directed to the Curl BC CEO.

Roles and Responsibilities

All workplace parties have a role to play in the implementation of this Policy.

Duties of the Employer

The Employer is required by law to provide a safe workplace. Part of that duty includes taking reasonable precautions to ensure that all employees are fit for duty.

The Employer also has a duty to provide individualized accommodation up to the point of undue hardship in accordance with the requirements of the *Human Rights Code, Ontario, or* similar legislation in other jurisdictions.

The Employer will ensure that this Policy is communicated to all employees, including managers and supervisors.

Duties of Management

Managers must:

- Enforce and abide by this Policy.
- Where appropriate and practical, assess the fitness for duty of employees under their control at the start of and throughout the work period.
- Pay attention for signs of impairment and take prompt and appropriate action whenever there are reasonable grounds to believe that an employee is impaired or not capable of working in a safe and effective manner. Such actions may include:
 - Further assessing the individual for impairment using observational and interview techniques;

- Sending the employee home with transportation (with or without pay, as applicable);
- Temporarily assigning the employee to less safety-critical work;
- Requiring a fitness for work assessment;
- Placing the employee on a leave of absence (with or without pay depending on the circumstances) pending further investigation.
- Work with employees who request and/or require accommodation for medical cannabis use or substance abuse/dependency as they would for any other employee requiring accommodation for a legitimate disability. This will normally include assessing the employee's fitness for work, with input from a qualified medical practitioner.
- Handle all employee information related to this Policy in a confidential manner, and not make any disclosure of such information unless the disclosure is necessary for protecting workers, investigating a complaint or incident, taking corrective action, assessing and developing an accommodation plan, or otherwise required by law.

Duties of Employees

Supervisory employees must:

- Abide by this Policy and lead by example.
- Assist management to implement and enforce this Policy, as directed.
- Serve as a liaison between management and other employees.
- Pay attention for signs of impairment and take prompt and appropriate action whenever there are reasonable grounds to believe that an employee is impaired or not capable of working in a safe and effective manner.
- Document and advise management of any incidence of suspected impairment.
- Treat employee information in a confidential manner, to the extent possible in the circumstances.

All employees (including supervisors and managers) must:

- Abide by this Policy and encourage their peers to do the same.
- Notify management/Human Resources and/or a Health and Safety Representative, as appropriate, of any safety issues, breaches or suspected breaches of the Policy.
- Cooperate with respect to any investigations into potential breaches of this Policy.
- Take responsibility to ensure their own safety and the safety of others.
- Comply with workplace standards and perform their work-related activities in a safe and effective manner.
- Ensure that they are fit for duty/not impaired when attending at and/or reporting to work.
- Remain fit for duty/not impaired for the duration of their shift and/or while on call.
- Never participate in activities which could cause a safety risk, such as driving or carrying out safety-sensitive duties while impaired.
- Not consume, possess, sell or distribute cannabis, other drugs, alcohol or related paraphernalia during work hours (including during paid and unpaid breaks), while on work premises, when representing the Employer and/or when there could be a potential impact on the Employer's reputation or interests. This is subject to an exception for use and/or

possession of a legal and prescribed drug in accordance with a pre-authorized accommodation plan.

- If on medically-approved medication, promptly disclose to the Employer any potential risk, limitation, or restriction requiring modification of duties or temporary reassignment. Without limiting the generality of the foregoing, employees must disclose medical cannabis use to the Employer prior to any drug-related incident or accident, and engage in and cooperate with the Employer's accommodation process, including by:
 - providing proof that medical cannabis use is medically and legally authorized;
 - providing proof of fitness for work, satisfactory to the Employer;
 - providing medical information with respect to the employee's restrictions, limitations and accommodation needs; and
 - maintaining ongoing communication with management regarding the effects of medical cannabis on their ability to perform their job duties.
- Use medications (including medical cannabis) only as prescribed and directed, and in accordance with any agreed-upon work modifications or accommodations.
- Communicate dependency or emerging dependency to the Employer, before job performance is affected or a drug-related incident or accident occurs and engage in and cooperate with the Employer's accommodation process, where applicable.
- Never use someone else's or share their own medication (including medical cannabis) with another employee, even those who may have a similar prescription.
- If an employee being accommodated must ingest medical cannabis by smoking, they will not be permitted to do so in the presence of other employees. The employee must also abide by all provincial smoking regulations. The Employer will work with the employee to determine an appropriate smoking area or other reasonable and safe solution, up to the point of undue hardship.

Disciplinary Action

Employees found in violation of this Policy may be subject to disciplinary action up to and including termination of employment. Where applicable, Curl BC may also take legal action in accordance with the law.

Please note that use of drugs as part of a prescribed and approved medical treatment program/accommodation plan or the reporting of a drug and/or alcohol related disability is not grounds for disciplinary action; however, failure to disclose the need for accommodation in advance of a drug-related incident or accident may be grounds for discipline up to and including termination of employment.

PROTECTION OF PRIVACY (BC-APPENDIX 9)

Privacy Statement

The collection, use, disclosure and retention of personal information are all regulated by law in British Columbia. Curl BC collects and uses personal information primarily to provide the programs, services, products and information required by members of Curl BC. To enable Curl BC to manage and develop its operations from local to international levels, Curl BC may share your personal information with its members and the Canadian Curling Association, and also with selected third parties who are acting on our behalf as our agents, suppliers or service providers.

From time to time, Curl BC may contact our members directly or may include information from corporate sponsors whose products, services or information may be of interest to our members. If you do not want to be included on the Curl BC mailing list, please advise the Curl BC Privacy Officer by post, email or fax. Our Privacy Policy is available at www.curlbc.ca or by contacting the Curl BC Privacy Officer.

Ten Principles of Privacy

At Curl BC, we value our relationship with our members and respect their privacy according to the following ten principles:

- 1) Curl BC is accountable and responsible for the safeguarding of personal information in our custody or under our control. Curl BC has appointed a Privacy Officer who is responsible for privacy issues within Curl BC. Curl BC has implemented procedures for the handling of personal information, and has developed a complaint process for members with personal information concerns.
- 2) Curl BC collects personal information only for the following purposes:
 - to establish and maintain a responsible relationship with our members and to provide ongoing service to all areas of curling within British Columbia;
 - to support and assist our member facilities in delivering programs and services at the local level;
 - to support and assist the Canadian Curling Association in delivering programs and services at the national and international levels;
 - to manage and develop our operations and help us plan for future growth; and
 - to meet legal and regulatory requirements.
- 3) Curl BC will obtain your consent to collect, use or disclose personal information (except where authorized or required by law to do so without consent). Consent can be express, implied, or given through an authorized representative such as parent or guardian, lawyer or agent.

You have the right to refuse or withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice. You may have your name removed from our telephone, mail or email lists. However, withdrawal of consent may limit our ability to communicate with and serve you.

- 4) Curl BC will limit the amount and type of personal information collected to that which is reasonable and necessary to fulfill its stated purposes.
- 5) Curl BC uses your personal information only for the purposes for which it is collected. Your personal information may also be disclosed by Curl BC for the following reasons.
 - Curl BC may disclose a member's personal information to a person who, in the reasonable judgment of Curl BC, is seeking the information as an agent of that member.
 - Curl BC may disclose a member's personal information to a public authority or agent of a public authority if, in the reasonable judgment of Curl BC, it appears that there is imminent danger to life or property which could be avoided or minimized by disclosure of the information.
 - In conjunction with special offers or programs, Curl BC may disclose members' personal information to our partners and associates or to third-party agents responsible for administering such offers or programs. Any such disclosure is made with the member's consent and on a confidential basis and is limited to the information needed for the stated purpose.

- Curl BC will keep personal information used to make a decision about an individual for a minimum of one year. After one year, Curl BC will destroy, erase or render anonymous personal information as soon as retention is no longer necessary.
- 6) Curl BC will make every reasonable effort to ensure that personal information it is using or disclosing is accurate and complete.
- 7) Curl BC will protect the personal information in its custody or control by making security arrangements to prevent unauthorized access, collection or use. Curl BC will protect the confidentiality of your personal information when dealing with other organizations.
- 8) Curl BC is open about the policies and procedures it uses to protect your personal information. Information about our policies and procedures is available in writing and electronically.
- 9) Members have the right to access their own personal information through the Curl BC Privacy Officer. Unless prevented by law, Curl BC will provide you with information regarding your personal information and give you the opportunity to correct any errors of fact.
- 10) Curl BC has developed a complaint handling process. Curl BC will investigate all complaints received and take appropriate measures to correct information and handling practices as required. Individuals may appeal any Curl BC decision to the Information and Privacy Commissioner of British Columbia.

Questions or Concerns

If you have any questions or concerns about the Curl BC privacy policy, contact us at (604) 333-3621 (outside of Greater Vancouver: 1-800-667-CURL (2875)). Otherwise, we will assume that we have your consent to continue to collect, use and disclose your personal information for the purposes identified above.

Curl BC Privacy Officer

The Curl BC Privacy Officer is the Chief Executive Officer (CEO).

The Curl BC Assistant Privacy Officer is the Participation Manager.

If you have any questions or concerns about your personal information in the control or custody of Curl BC, please contact the Privacy Officer or Assistant Privacy Officer.

Appointment of Privacy Officer

The CEO is appointed by the Board of Governors as the Curl BC Privacy Officer.

The Privacy Officer must be familiar with the legislation and should be knowledgeable about Curl BC's personal information management practices. The Curl BC Privacy Officer is responsible for:

- encouraging compliance with provisions of the Personal Information Protection Act;
- responding to requests for access to and correction of personal information and general issues concerning personal information;
- working with the Information and Privacy Commissioner during an investigation of a privacy complaint against Curl BC; and
- managing Curl BC's complaint process.

Assistant Privacy Officer

The Participation Manager is appointed by the Board of Governors as the Curl BC Assistant Privacy

Officer. The Privacy Officer and/or Assistant Privacy Officer are responsible for managing the necessary changes to Curl BC's information management practices and procedures, staff training, member relations, and implementation of privacy policies and procedures. The Privacy Officer and/or Assistant Privacy Officer will provide assistance when a more detailed knowledge of Curl BC's responsibilities is required. The Assistant Privacy Officer will act as a resource to the Privacy Officers designated by Curl BC's member facilities and member associations.

Consent

Curl BC will make all reasonable effort to ensure that the purposes for personal information collection are stated at the time collection takes place.

Forms

Curl BC will review and revise its forms to include a statement of purpose. As appropriate, forms will also include a provision for an individual to opt out of providing some personal information. This includes written and electronic forms.

Communications materials

Consent is not required to disclose information (including photos and videos) obtained by observation at a public event or Curl BC event in which an individual voluntarily participates. However, as a courtesy, Curl BC will endeavor to obtain consent to use personal information in its publications, in communications materials such as posters and press releases and on its web site.

Refusal or withdrawal of consent

An individual has the right to refuse consent to use personal information or to withdraw consent at any time.

Curl BC will give individuals the opportunity to opt out at time of collection of information. The individual's choice will be respected. This may mean that the individual does not receive general Curl BC communications or any special offers or information on behalf of Curl BC's partners and associates.

An individual may withdraw consent for use of personal information at any time upon 30 days written notice to the Privacy Officer. The notice may be given by post, fax or email. The Privacy Officer must notify the individual of any consequences of this withdrawal of consent, and must also advise the individual when Curl BC has complied with their request.

Sharing Information

Curl BC is responsible for personal information that has been collected and transferred to another organization. This may be a member facility, the Canadian Curling Association, a partner, a sponsor, an agent, or a service contractor. In all cases, when transferring information, Curl BC will clearly state what requirements must be met to comply with the legislation and with Curl BC's personal information management practices.

Curl BC is also responsible for personal information collected on our behalf by another organization. British Columbia organizations collecting information on behalf of Curl BC must clearly state the purpose for collection and all such information will be treated by Curl BC according to the legislation and our personal information management practices.

Organizations outside BC, such as the Curling Canada are not subject to the BC Personal Information Protection Act legislation.

Accessing and Correcting Information

An individual has the right to access their personal information and to correct errors of fact.

Accessing your personal information

Requests for access to personal information must be made in writing to the Privacy Officer. The request must include sufficient detail to enable the Privacy Officer to identify the information requested.

The Privacy Officer must respond to the request for access within 30 business days. The response must include, if requested, the ways in which the personal information has or is being used, and a list of organizations to whom the information has been disclosed.

The Act identifies certain circumstances where information may be withheld. If the Privacy Officer withholds information, he or she must give the reason and identify the Section of the Act under which the information is being withheld.

Correcting your personal information

If personal information held by Curl BC is incorrect, an individual may request correction by writing to the Privacy Officer. The individual must provide sufficient documentation to show that the correction is justified. Any original documentation supplied through this process by an individual will be returned, although copies will be taken for the file.

The Privacy Officer will ensure that the appropriate corrections are made and that any incorrect information that has been disclosed within the year prior to the request is corrected.

An individual may not correct opinions, but may annotate their file. This is done by writing to the Privacy Officer. The Privacy Officer will ensure that such annotation is included in the individual's file.

An individual may not request original documents held by Curl BC but may request copies. Curl BC will provide copies to the individual at minimal or no cost. These documents must relate solely to the individual's personal information and may not include information of a personal nature about any other individual.

Handling Complaints about Personal Information

Complaints about Curl BC's management of personal information may be instigated verbally or in writing and should be directed to the Curl BC Privacy Officer. Whether verbal or written, the complaint should follow the guideline of the Curl BC Personal Information Complaint Form to ensure that the concern is documented thoroughly and with all relevant details. Initial complaints may be directed to members of staff, management, or to a representative of the Board of Governors who will pass them to the Privacy Officer or Assistant Privacy Officer as appropriate.

Complaints may not be investigated by any person who may be named in the complaint.

The Privacy Officer or Assistant Privacy Officer (the "Investigator") will investigate all complaints received. The Investigator will acknowledge receipt of the complaint promptly, and may contact the individual to clarify the complaint if necessary.

The Investigator will be given access to all records, employees and others who handled the personal information or access request.

Where the complaint is justified, the Investigator will take appropriate measure to rectify the situation, including correcting information handling practices and policies where necessary and communicating those changes to relevant staff and volunteers. The Investigator will follow up to verify that the required changes have been implemented.

The Investigator will notify individuals of the results of an investigation clearly and promptly, informing them of relevant steps taken.

The Investigator will record all decisions to ensure consistency in applying the Act.

Requesting a review

Should an individual not be satisfied with the handling of their complaint, the Privacy Officer or Assistant Privacy Officer will inform them of the recourse they have to request a review by the Information and Privacy Commissioner of British Columbia. The Privacy Officer or Assistant Privacy Officer will provide the required contact information to a complainant wishing a review.

Security of Personal Information

Personal information in Curl BC custody or under Curl BC control will be safeguarded with the appropriate level of security, according to whether the information is regarded as "low sensitivity," "medium sensitivity," or "high sensitivity." Security measures may include locked file cabinets, restricted access to offices, safety deposit boxes, and for computers: user ids and password-protected electronic files.

Retention of Personal Information

The Act requires Curl BC to hold personal information for one year. For various legal purposes, Curl BC holds all personal information for a minimum of two years. During that period, an individual has access to his or her personal information through the Privacy Officer and may correct errors of fact or lodge a complaint through Curl BC's standard personal information complaint procedures. Selected personal information may be retained indefinitely. All retained personal information is subject to the rules and regulations of the Act regarding use, security and disclosure.

Personal information may be retained indefinitely in the form of statistics for purposes of research and program and organizational development, and to support and assist partners and associates in their development programs. Personal information may also be retained indefinitely in the form of anonymous anecdotal information for research, training and organizational development.

Destruction of Personal Information

Personal information no longer necessary to the purposes of Curl BC will be destroyed, erased, or rendered anonymous.

Curl BC will periodically clear its files of personal information that no longer needs to be retained. Written records or documentation containing personal information to be destroyed will be shredded or burnt. Computer files containing personal information to be destroyed will be erased, and a file search conducted to ensure that all copies of the information are erased.

Where existing personal information is corrected, updated or replaced, the previous version will be dated and archived in a locked file cabinet for a minimum of one year.

Providing Employment or Personal References

No member of the Curl BC management and staff or representative of the Curl BC Board of Governors may provide a personal or employment reference for an individual without the consent of the individual. In the absence of consent, Curl BC will only confirm an employment; i.e. -yes, that individual worked/volunteered for us" or -no, that individual did not work/volunteer for us."

Consent is given by an individual's request to Curl BC for a written reference or for use of a Curl BC representative's name. In the absence of such a request from the individual, Curl BC or one of its representatives must have satisfactory confirmation of consent before providing an employment or personal reference. That confirmation may be a fax of a resume listing Curl BC or its representative as a reference. It is not Curl BC's responsibility to seek consent.

Collecting Information without Consent

According to the Act, Curl BC may collect, use or disclose personal information without the consent of the individual. Curl BC will forgo obtaining consent on the following occasions.

- When collecting or disclosing the information clearly benefits you or is necessary for medical treatment and your consent cannot be obtained in a timely way.
- When the information is needed for a proceeding or an investigation and getting consent might compromise the availability or accuracy of the information.
- When the information is used for journalistic purposes and for no other purpose.
- When the information is collected by observation at a competition or other public event in which the individual voluntarily participates.
- When the information is necessary to determine the individual's suitability to receive an honour or award or be selected for an athletic purpose.
- When the collection of information is required or authorized by law (such as criminal record checks).
- When the information is necessary to facilitate collection of a debt owed to Curl BC.

Updating Privacy Policy and Procedures

The Privacy Officer will be responsible for answering questions about Curl BC's personal information policy and procedures and for remaining current with protection of privacy information posted on the BC Government web site. Curl BC will update its Privacy Policy and Procedures on a regular basis and provide information on changes to its members in a timely way through member communications and/or the Curl BC web site.

PROFESSIONAL DEVELOPMENT:

At the discretion of the CEO, employees may be able to attend conferences, courses, seminars and meetings, identified through annual work plans and performance reviews, which may be beneficial to the employee's professional development. If these opportunities are directly related to the employee's position, or are suggested by the Chief Executive Officer, then some or all of the cost of registration, course materials and travel expenses may be covered.

If Curl BC has agreed to pay for a course, the fees will be paid on evidence of successful completion.

C. OPERATIONAL POLICIES

STANDARDS OF BUSINESS CONDUCT AND CONFLICT OF INTEREST

A conflict of interest for Curl BC employees can occur when an individual is involved in multiple interests, one of which can potentially corrupt the motivation for an act in another. Conflicts of interest can cause the potential for negative public perception, impact on the Curl BC's image and/or brand, or adversely affect the integrity of the organization.

Please note that the presence of a conflict of interest is independent from the execution of impropriety. If Curl BC believes that an employee's secondary interests interfere with Curl BC's primary interests to the point the circumstances are reasonably believed, on the basis of past experience and/or objective evidence, to create a risk that decisions may be unduly influenced—Curl BC will deem a conflict of interest.

A conflict of interest, if not dealt with properly, may leave doubt about the objectivity of a particular decision-making process, thereby rendering the entire organization suspect. It is, therefore, crucial for each Curl BC employee to recognize a conflict of interest, disclose it and remove themselves from the decision making and ideally, from the entire discussion.

All employees of Curl BC are expected to adhere to the following Standards of Business Conduct and Conflict of Interest parameters:

- The business of Curl BC shall be conducted in accordance with the laws of British Columbia conducted in accordance with the highest ethical standards of business conduct.
- No employee or representative shall knowingly permit Curl BC to enter into any agreement or contract requiring Curl BC to do any act prohibited by law; nor shall they knowingly aid or abet any party in their dealings with Curl BC to circumvent any laws, including any laws relating to restraint of trade, currency exchange or taxation.
- No employee or representative of Curl BC is to accept gifts in cash or cash equivalent (other than of nominal nature), nor shall they use their status with Curl BC to obtain a personal gain from those doing or seeking to do business with Curl BC.
- Soliciting of tips in the performance of your duties is not permissible.
- Employees or representatives shall not use inside information gained by virtue of their involvement with Curl BC for their own personal gain; nor shall they disclose such information for the use of others.
- Staff, who find themselves in an unavoidable conflict of interest, must declare that conflict immediately and absent themselves without comment from the operational discussion and potential vote on the issue.
- All Curl BC staff meetings will have a standing conflict of interest agenda item at the commencement of each formal meeting. This will allow staff to declare any conflict. Staff members who declare a conflict will be included in the minutes/notes by name and be entitled to receive the related staff decision, once any review and final decision has been rendered.
- Employees shall disclose their involvement with other organizations, vendors, or other associations that produce a conflict when they sign a Code of Conduct and at any time during the year should their involvement change.

- Employees shall refrain from any role at its national events and Season of Champions properties which may place Curl BC in a conflicted position. Employees, as a minimum, will not be permitted to play a coaching or competitor role at any such events.

CONFIDENTIAL INFORMATION AND INTELLECTUAL PROPERTY:

Confidential Information

From time to time, employees of Curl BC may come into contact with confidential information, including, but not limited to, information about Curl BC's members, suppliers, finances and business plans. Employees are required to keep any such matters that may be disclosed to them or learned by them confidential.

Furthermore, any such confidential information, obtained through employment, must not be used by an employee for personal gain or to further an outside enterprise.

Intellectual Property

Any intellectual property, such as trademarks, copyrights and patents, and any work created by an employee in the course of employment at Curl BC shall be the property of Curl BC and the employee is deemed to have waived all rights in favour of Curl BC. Work, for the purpose of this policy refers to written, creative or media work. All source material used in presentation or written documents must be acknowledged.

IT Information Storage and Security

Any storage devices (CD's, USB's, Floppy Discs) used by employees at Curl BC, acknowledge that these devices and their contents are the property of Curl BC. Furthermore, it should be understood by employees, that company equipment should be used for company business only during normal working hours. Downloading of personal materials on company equipment can be harmful to said equipment and should not be done.

POLITICAL ACTIVITY

Employees are free to participate in political activities including belonging to a political party, supporting a candidate for elected office and actively seeking elected office. Employees' political activities, however, must be clearly separated from activities related to their employment. If engaging in political activities, employees must be able to retain the perception of impartiality in relation to their duties and responsibilities to Curl BC.

Employees must not engage in political activities during working hours and partisan politics at the local, provincial or national levels are not to be introduced into the workplace. This does not apply to informal private discussions among co-workers.

MOBILE PHONE/DEVICE

Curl BC may reimburse some or all of the monthly charges for an employee's personal mobile phones/devices if the phone is essential for the employee to conduct business on behalf of Curl BC. This will be determined on a case-by-case basis in discussion with the CEO.

COMPUTER/INTERNET ACCEPTABLE USE

Computer-based technology and Internet systems are to be used for appropriate company business only. All Curl BC information and correspondence, including email, transmitted/received using our computer-based technology is considered to be the business property of the company and is to be managed accordingly for appropriate business-related matters.

Password Protection

- Internet access is managed via individual user accounts and confidential passwords.
- All user names and passwords for owned and operated devices must be supplied to Curl BC's information technology (IT) company, Garnet Research.
- Curl BC employees may be required to provide Garnet with security questions/answers to be used in the event that a password is lost, forgotten or compromised.
- In the event that an employee loses, forgets, or believes that his or her password has become compromised, the employee must inform Garnet immediately. Garnet shall confirm the user name, reset the password, and inform the employee of the changes made.

Security

Any and all passwords may not be disclosed to, or shared with, other users or third parties. Internet accounts are to be accessed only by assigned users for legitimate business purposes. Employees are not permitted to obtain anyone else's account password. If a user has reason to believe that his/her password has been compromised, the user must inform Garnet immediately.

Internet users must comply with the following security guidelines, rules, and regulations:

- Personal files or data downloaded from the internet may not be stored on Curl BC's PC hard drives or network file servers.
- Video and sound files must not be downloaded from the Internet unless their use has been authorized for the purposes of conducting Curl BC business.
- Users must refrain from any online practices or procedures that would expose the network or resources to virus attacks, spyware, adware, malware, or hackers.
- Users are responsible for familiarizing themselves with procedures for downloading and protecting information in a secure manner, as well as for identifying and avoiding any online material deemed sensitive, private, and copyrighted.
- Employees utilizing the internet must conduct themselves in a professional manner at all times, especially while participating in collaborative activities, and must not disclose CC information or intellectual capital to unauthorized third parties.

Appropriate Use of Internet

Employees may use the Internet only to complete their job duties, under the purview of Curl BC's business objectives. Permissible, acceptable, and appropriate internet related work activities include:

- Researching, accumulating, and disseminating any information related to the accomplishment of the user's assigned responsibilities, during working hours or overtime.
- Collaborating and communicating with other employees, business partners, and customers of Curl BC, according to the individual's assigned job duties and responsibilities.
- Conducting professional development activities (i.e. news groups, chat sessions, discussion groups, posting to bulletin boards, web seminars, etc.) as they relate to meeting the user's job requirements.

Inappropriate Use of Internet

Inappropriate and unacceptable internet use includes, but is not limited to:

- Usage for illegal purposes, such as theft, fraud, slander, libel, defamation of character, harassment (sexual and non-sexual), stalking, identity theft, online gambling, spreading viruses, spamming, impersonation, intimidation, and plagiarism/copyright infringement.
- Any usage that conflicts with Curl BC's mission, goals and reputation.
- Copying, destroying or altering any data, documentation, or other information that belongs to Curl BC or any other business entity without authorization.
- Downloading unreasonably large files that may hinder network performance. All users shall use the internet in such a way that they do not interfere with others' usage.
- Accessing, downloading, or printing any content that violates any of Curl BC's existing policies or Canadian law, i.e. sexually explicit material.
- Engaging in any other activity which would in any way bring discredit, disrepute, or litigation upon Curl BC.
- Engaging in personal online commercial activities, including offering services or products for sale or soliciting services or products from online providers.
- Engaging in any activity that could compromise the security of Curl BC host servers or computers. Any and all passwords may not be disclosed to, or shared with, other users.
- Allowing unauthorized or third parties to access Curl BC's network and resources.

Accessing & Monitoring Computer/Internet Usage

Curl BC reserves the right to access and monitor staff use of company email, computer usage and Internet systems. Only authorized staff may examine such usage/records for business-related issues. Curl BC will do its best to accommodate employee privacy while being diligent and thorough when conducting investigations regarding company email, and computer and Internet usage.

INTERNET

Curl BC will not reimburse employees for monthly home internet charges, including for work related activities.

AUTHORIZED SPOKESPERSONS

The chief spokesperson for Curl BC is the CEO. The CEO will typically speak on the direction of the organization, national sponsorship matters, financial performance, major event announcements, sport performance, etc.

The main point of contact for the media is the Communication & Marketing Manager. This individual will review most requests for information and/or interview and have the CEO or designate speak on the subject matter.

MEDIA RELEASES/PUBLIC SERVICE ANNOUNCEMENTS

Media releases and PSAs are a standard form of communication which Curl BC will utilize in an effort to inform and expose Curl BC products, services, and events to a wide array of stakeholders, especially the media. Depending on the time of year, such releases may occur on a weekly or monthly basis. The protocol of such releases is that they are typically designed and formatted by the Communication & Marketing Manager. Curl BC related media releases or PSAs require approval from the CEO.

All Curl BC staff are encouraged to generate ideas or concepts which are media worthy and, in turn, help the Communications Manager with the necessary information or access to the facts pertaining to the release.

In terms of distribution, the current process is that the Curl BC Board of Governors are to be the first stakeholders who receive the media releases or PSAs. The Board receives this information after it is in its final format and has been approved by the CEO. Depending on the content and timelines involved, this may be a few hours prior to the full distribution, or typically the day prior to full release.

Curl BC staff are also to be issued the information prior to it being sent to the full media and general public.

The Communications Manager is responsible for the information distribution to the Curl BC Board, staff, clubs and selected other stakeholder groups on the distribution list.

Similarly, the Communication Manager is responsible for the complete distribution of all media releases and/or PSAs to the media.

SPEAK UP / OPEN COMMUNICATION

Curl BC employees are the backbone of the organization. Each employee is encouraged to bring forward suggestions or comments. This can be done verbally or in writing to the CEO. Change can only occur if the proper individuals are made aware of the issue.

RETURN OF COMPANY PROPERTY

Curl BC property including, but not limited to keys, laptop computers, mobile phones, etc. must be returned to the Company immediately upon termination or resignation. The deemed value of any Company property not returned will be deducted from the last pay cheque and/or from any outstanding vacation pay. Continued use of Company property by the employee or other after termination, could result in criminal charge

SCENTS

Curl BC will strive to eliminate scented products from the workplace, as some individuals may have allergies or sensitivities to perfumes, lotions, colognes and/or chemical smells.

Wherever possible, we encourage our staff and visitors to use unscented or fragrance-free products. Employees will be required to abide by this policy and avoid using scented products.

Visitors and Curl BC employees will be informed of this policy through signs posted at entrances and elevators/stairwells, or by their host.

PERSONAL USE OF COMPANY PROPERTY OR EQUIPMENT

All provided equipment and/or property are intended for their assigned business purposes only, and are also intended exclusively for use in the performance of Curl BC business.

Employees are strictly prohibited from using equipment or property for unapproved business activity. Curl BC also prohibits the use of any company equipment or property for personal use.

Maintenance/Care:

- It is the responsibility of the employee in possession of Curl BC property to ensure that equipment and/or property are properly maintained.
- Curl BC materials and property are intended only for their approved use.
- In the event that any Curl BC owned materials or property are lost or stolen, employees are required to report the loss/incident to the CEO as soon as possible, and will be required to participate in any investigations that are deemed necessary.
- Employees are expected to adhere to all operating instructions and guidelines, safety standards and general care instructions.
- In the event that damage to the material(s) occurs, it should be reported to the CEO as soon as possible, with a description of the extent of the damage, and whether or not it is still a viable piece of equipment.
- Damaged equipment/material(s) should be returned to the CEO for assessment and repair or warranty service.
- Employees are required to minimize any possible damage to equipment that is not in use by safely storing the equipment.