

POLICY, RULES AND PROCEDURES ON INTEGRITY PROTECTION¹

April 2024

¹ For simplicity, the term “integrity protection” is used throughout this translation of the French version of this policy. In this context, the concept of “integrity” can be understood as “bodily security and inviolability and physical and psychological security”.

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BACKGROUND

Camps provide a special environment where people learn to develop respect, a healthy competitive spirit and solidarity, and where the experience of living in a group is based on comradeship and sharing.

Many safety-related variables and several conditions in the camp environment can be conducive to violence and assault. Large numbers of participants are present, a climate of trust reigns between participants and staff members, and there is very often a degree of physical closeness (changing rooms, showers, physical contact).

Given these considerations, the Association des camps du Québec and every member camp has a moral and legal responsibility to protect everyone involved in this environment. In addition to causing nefarious consequences for children, certain behaviours are damaging to sports and leisure ideals and tarnish the image of camps and of the employees and volunteers who devote themselves sincerely to the welfare of participating clientele.

As part of its mission, the Association des camps du Québec (ACQ) has a responsibility to protect its members by providing a safe, fair, trusted environment for all types of participants, members of staff and directors.

OUR MISSION

Founded in 1961 on the initiative of camp managers, the Association des camps du Québec (ACQ) is recognized by and receives financial support from the Gouvernement du Québec as an Organisme national de loisir (ONL) [national leisure organization]. The ACQ's mission is to promote, represent and support the quality and value of the camp experience and its contribution to the development and health of individuals, families and youth in Québec.

With over 400 member organizations, the ACQ caters to camps of every kind: nonprofit, private, municipal, day, sleepaway and family camps, and camps for special needs clientele, etc.

OUR VALUES

Representing our members

We know that our industry and our members define us. It is our duty to remain in tune with them, upholding their interests and ensuring that their contribution to Québec society is recognized.

Supervising with expertise

We promise quality supervision for the welfare of camp participants, based on proven and constantly updated expertise. We recognize our members' unique expertise in providing unforgettable experiences in a safe, wholesome environment.

Prioritizing individual development

We know that the camp experience makes an invaluable contribution to the overall development of individuals, families and youth. We support our members' capacity to help participants grow, both educationally and socially, in harmony with their environment.

Bringing the magic of camps to life

We exist in order to support our members as they create and provide meaningful experiences and moments of joy, and we foster contact with nature. We seek to reflect the energy of camps in our own actions as an organization.

Listening and acting proactively

We are fully aware of the importance of hearing and understanding our members and their needs. We keep a close watch on our industry so that we can anticipate issues and innovate.

Being inclusive

We believe that the camp experience is for everybody. As an organization, we openly welcome diversity, and we work to ensure that camps are accessible for every individual and for the entire community.

COMMITMENT

Accordingly, the ACQ will not tolerate any form of abuse, harassment, neglect or violence – physical, psychological or sexual – in all programs and activities offered by itself and its members, such programs and activities being considered “approved”.

The ACQ recognizes the importance of taking all reasonable steps to prevent, and to intervene in order to stop, any form of abuse, harassment, neglect or violence brought to its knowledge. This is why it has adopted this Policy, which contains preventive measures and a Code of Conduct setting out the main duties associated with running the activities that the ACQ governs. The Code of Conduct forms an integral part of this Policy.

This Policy and the Code of Conduct are expressly binding on ACQ members. The fact that many of the people making up its members (for example, counsellors, managers, consultants, trainers and administrators) are in a position of authority warrants that the ACQ should play a leading role in creating a healthy camp sector.

This Policy on integrity protection (safeguarding bodily security and inviolability and physical and psychological security) constitutes an internal governance tool to which all persons listed in section 6 below are subject, and which seeks to govern those persons’ behaviour to ensure that it complies with our mission at all times.

This Policy in no way replaces or supplants any law, regulation or other provision that may apply.

The complaint management procedure set out in this Policy in no way replaces or supplants any procedures provided for remedy in a court of law.

For the purposes of implementing this Policy, definitions of terms used are set out in Appendix A and the Code of Conduct in Appendix B.

OBJECTIVES

The provisions of this Policy of the ACQ are intended to:

- a) Make everyone having any kind of involvement in the camp sector aware that no form of abuse, harassment, neglect or violence will be tolerated.
- b) Take reasonable steps to offer a healthy camp environment free from abuse, harassment, neglect and violence.
- c) Introduce measures that foster respect for the dignity and psychological, physical and sexual integrity of persons involved in the camp sector.
- d) Encourage the reporting of behaviour, remarks, actions and gestures that constitute abuse, harassment, neglect or violence as soon as they appear.
- e) Implement an effective procedure for protecting integrity, providing access to a formal process for the handling of complaints of abuse, harassment, neglect or violence by an Integrity Protection Committee and, beforehand, if the parties are willing and give their consent, access to an informal conflict resolution process such as mediation.
- f) Take the necessary administrative or disciplinary measures to stop abuse, harassment, neglect or violence brought to its knowledge.
- g) Identify resources that a person involved (either as victim or witness) in a situation of abuse, harassment, neglect or violence in a camp environment can contact if needed.
- h) Approve the mandate of the independent Complaints Officer to deal with any complaint of abuse, harassment, neglect or violence.

SCOPE

This Policy applies to all those involved in member camp environments (particularly participants, parents of members or participants, volunteers, paid employees, administrators, suppliers, clients, etc.). It concerns all cases of abuse, harassment, neglect or violence as defined in **Appendix A** that may arise in a “approved” activity or program or another non-leisure activity. Members taking part in a non-approved leisure activity must understand however that the ACQ’s capacity for action may be limited when non-members are involved.

Concerning the specific subjects covered and defined in **Appendix A** (abuse, harassment, neglect, violence), this Policy takes precedence over all other policies, rules and procedures that may be in force at the ACQ or one of its members, and is binding on all ACQ members.

Application of this Policy does not prevent an employer, either the ACQ or one of its members, from following its own internal policy regarding harassment with regard to its employees, or from conducting its own administrative investigation so as to take any measure it deems appropriate regarding an alleged victim and an alleged perpetrator of abuse, harassment, neglect or violence, even if that person is a member of the ACQ. Moreover, this Policy does not prevent the application of a regulation providing for the imposition of an automatic sanction by the ACQ or one of its members in the framework of an activity involving members. At any time, an alleged victim can also turn to the competent courts to assert their rights, as the case may be.

PREVENTIVE MEASURES

The ACQ and its members are committed to providing an environment in which all are treated with dignity and respect. Every participant, volunteer and member of staff has the right to a safe, high-quality environment free from bullying, violence and sexual assault.

Preventive measures have been set up in the ACQ and the camp sector to prevent and intervene in cases of violence. Among these are:

Checks and procedures applicable at the time of selection and hiring

To guarantee the integrity of camp staff, the selection process requires that all candidates:

- a) answer targeted questions, in front of the selection committee, regarding their role and responsibilities concerning problems of violence
- b) sign (or have their parent or legal guardian sign) a form consenting to a judicial record check (and other checks as needed)
- c) provide two references testifying to their fitness to perform the duties for which they are applying and the ensuing responsibilities

Before making candidates' status as employees official, the ACQ and its members must check their judicial record and collect their references.

Every three years, the ACQ and its members conduct a fresh check of employees' judicial records (and other measures, such as taking references, as needed).

Every year, the ACQ and its members ask all employees to sign a declaration on honour stating that there has been no change in their judicial record.

If there has been a change, the case must be examined to determine whether there is a clear connection between the offence and the employee's duties. Should a clear connection be established, the employee could be reassigned to new duties or dismissed as the case may be. Such matters are to be dealt with entirely by management of the organization concerned.

Training and informational activities

To help staff engage in violence prevention and intervene in the event of violence, their training must include awareness activities specifically designed to inform them about this Policy and means of prevention and intervention.

In member camps, staff training must address the following subjects:

- a) identifying situations or potential incidences of bullying, various forms of violence and neglect, and the consequences for participants, staff and the community
- b) roles and responsibilities of staff
- c) prevention measures (camp code of conduct, staff code of conduct)
- d) reporting and intervention procedures in case of rumours and suspicions, of problems reported by participants, and inappropriate behaviour
- e) the *Youth Protection Act* and emergency measures

Situation-simulation exercises and discussions make it easier for staff to understand and take on board the rules and prevention/intervention procedures applicable in situations that may arise during camp activities.

Preventing risky situations

To create a healthy, safe environment for all, the ACQ and its members must promote a camp code of conduct, and provide employees with a staff code of conduct, and ensure that these codes are followed. These codes of conduct are aimed at protecting participants, staff and the community.

Staff code of conduct: Applicable to members of staff, this code sets out attitudes and behaviour to adopt in various situations. The staff code of conduct is presented to employees verbally and in writing and may serve as a reference for staff evaluation.

See the example in **Appendix B**.

Camp code of conduct: Applicable to all participants, clients and members of staff, this code emphasizes respect and non-violence in language and actions. The camp code of

conduct is presented to participants, clients and members of staff verbally and in writing, and is posted on signs.

See the example in **Appendix C**.

RIGHTS AND RESPONSIBILITIES OF PERSONS INVOLVED

The ACQ reminds readers that, under the *Youth Protection Act*, anybody having reasonable cause must report all situations of sexual abuse and any physical abuse of a minor to the Director of Youth Protection, regardless of the alleged perpetrator of the abuse and of steps taken by parents to put a stop to the situation. This requirement to report also applies in a situation where a minor suffers bodily harm or is subjected to unreasonable methods of upbringing or supervision.

All persons involved in the camp sector must maintain and promote standards of conduct to keep the sector free from abuse, harassment, neglect and violence, particularly in compliance with the Code of Conduct created by the ACQ.

The ACQ expects cooperation from all, and encourages everyone to make their disapproval known when faced with conduct that they deem inappropriate and to make use of this Policy as needed.

Anyone involved in the camp sector must report to the Complaints Officer any **sexual** abuse, harassment or violence towards a person who is also involved in the camp sector, whether the latter is minor or major.

Anyone involved in the camp sector must report to the Complaints Officer any **non-sexual** abuse, harassment, negligence or violence towards a person who is also involved in the camp sector, whether the latter is minor or major.

All members of the ACQ must collaborate in the process of handling a complaint filed under this Policy. All members must moreover respect the confidentiality to which the handling of a complaint is subject.

TYPES OF COMPLAINTS

Complaints must be dealt with promptly to allow rapid intervention to put a stop to the situation. The process for handling complaints depends on whether the complaint involves:

- a) confidentiality and personal information (see the ACQ Policy)
- b) camp operation: customer service, safety of activities and facilities, etc. (see the ACQ Policy)
- c) standards, regulations or laws: we refer cases to other authorities, e.g. labour standards
- d) integrity
- e) sexual abuse, harassment or violence
- f) non-sexual abuse, harassment or violence

HOW TO FILE A COMPLAINT

Complaints regarding confidentiality and personal information should be addressed in writing to the person responsible in the organization concerned:

- in the case of the ACQ: Gabrielle Dessureault-Germain at gdgermain@campisquebec.com

Complaints regarding the operation of camps such as:

- compliance with ACQ standards
- customer service
- activity supervision
- host site quality
- etc.

should be filed by completing this form: <https://campisquebec.com/formulaire-contact-en-cas-de-probleme>

The safest and most direct way of filing **complaints regarding integrity** is to use the “*Je porte plainte*” mechanism. A button bearing this label can be found on the ACQ website and is available at all times to all members and clientele served.

- a) A complaint of sexual abuse, harassment or violence can be filed at any time. To understand the process of handling a complaint of this nature, see **Appendix D**.
- b) A complaint of non-sexual abuse, harassment or violence should, unless there are exceptional circumstances, be filed within one hundred and twenty (120) days of the event or events giving rise to it. To understand the process of handling a complaint of this nature, see **Appendix E**.

All complaints must be made in writing and forwarded directly to the Complaints Officer. They must be signed and must include the name and contact information of the alleged victim, a description of the alleged acts and their context, and the identity of the alleged perpetrator of the abuse or harassment.

If the Complaints Officer or the Integrity Protection Committee consider a complaint to be abusive, frivolous or made in bad faith, they can initiate a new complaint process against the complainant who, if a member of the ACQ, may be subject to disciplinary or administrative measures.

The Complaints Officer can forward their complaint against the complainant to the Integrity Protection Committee, which can then convene and hold a hearing in accordance with the procedures set out in this Policy, with the necessary adjustments.

If in dealing with a complaint the Committee finds that the complaint is abusive, frivolous or made in bad faith, it must make its own complaint to the Complaints Officer, who will then appoint a new Integrity Protection Committee made up of different members, so that a recommendation can be made to the ACQ to sanction the wrongful conduct of the complainant, as applicable.

CONFIDENTIALITY

The ACQ respects the right of individuals to the confidentiality of their personal information. Accordingly, it recognizes that personal information obtained as a result of the implementation of this Policy and the decisions made under this Policy is confidential and must remain confidential within the limits established by law.

THE ACQ'S COMMITMENT

All members of the ACQ must comply with this Policy and communicate it to their clientele and staff, for example by letting them know in writing of its existence and publishing it on their website.

All members of the ACQ must, where applicable, take appropriate measures to enforce decisions of the Complaints Officer and the Integrity Protection Committee. It falls to the Complaints Officer to make the necessary checks with the members concerned to make sure that decisions made under this Policy have been complied with.

A member who fails to comply with decisions made and fails to take the necessary measures may be liable to disciplinary or administrative measures. In these circumstances, the Complaints Officer sends a copy of their complaint to the Integrity Protection Committee, which will then hold a hearing in accordance with the procedures set out in this Policy, with the necessary adjustments, so that a decision on sanctioning the member's wrongful conduct can be made.

CONTESTING A DECISION AND DISCLAIMER

The validity or the legality of the decisions made under this Policy cannot be contested before the courts except to challenge an error of law or a contravention of a rule of public order.

RESOURCES TO CONTACT IN CASE OF ABUSE OR HARASSMENT

- a) The Director of Youth Protection in your region
- b) The police
- c) Help line in your area (Tel-Aide, Tel-Jeune, Sport'Aide, etc.)

**** In the event of a discrepancy between the French and the English versions of the Policy, Rules and Procedures on Integrity Protection, the French version shall prevail.***

APPENDIX A — DEFINITIONS

The concepts set out in this section apply to all participants in the leisure community, including vulnerable clientele (participants with a physical or intellectual disability).

The use of bold type within a definition indicates that the words or terms concerned are themselves defined in this appendix.

Physical abuse:

- a) A situation in which a person suffers bodily harm, whether or not this leaves marks, or is subjected to unreasonable methods of upbringing by a parent or parents, or by any other person involved in the sector.
- b) A situation in which a person is at serious risk of bodily harm, whether or not this leaves marks, or of being subjected to unreasonable methods of upbringing by a parent or parents, or by any other person involved in the sector.

Sexual abuse:

- a) A sexual gesture or act, with or without physical contact, including any form of sexual exploitation, committed by any person towards another.
- b) A serious risk of a sexual gesture or act, with or without physical contact, including any form of sexual exploitation, being committed by any person towards another.

Any instance of sexual harassment or any form of unsolicited sexual behaviour is deemed sexual abuse.

Sexual assault:

A sexual act, with or without physical contact, committed by an individual without the consent of the victim or, in some cases, especially when children are involved, through emotional manipulation or blackmail. It is an act that aims to subjugate another person to the aggressor's own desires through the abuse of power, through the use of force or coercion, or through implied or explicit threats. Sexual assault violates an individual's fundamental rights, notably the right to bodily and psychological security and inviolability, and to physical safety. This definition applies regardless of the age, gender, culture, religion or sexual orientation of the victim or the aggressor, regardless of the type of sexual act or the place or setting in which it was committed, and

regardless of the nature of the relationship between the victim and the aggressor.

Psychological harassment:

Any vexatious conduct in the form of repeated and hostile or unwanted behaviour, verbal comments, actions or gestures, that violates a person's dignity or psychological or physical integrity and results in a harmful living environment for the person concerned. A single serious incidence of such behaviour that has a lasting harmful effect on a person may also constitute psychological harassment.

Examples of behaviour that may be considered psychological harassment: bullying, cyberbullying, threats, ostracization; offensive or defamatory remarks or acts concerning a person or their work; verbal violence; belittling.

Sexual harassment:

Abusive, injurious or importunate conduct with a sexual connotation that has direct consequences on the victim's ability to maintain or improve their living conditions, and/or creates a climate of bullying, humiliation or hostility towards them.

Examples of behaviour that may be considered sexual harassment: any form of unwanted attention or advance with a sexual connotation, for example, insistent solicitation, looks, kisses or touching, sexist insults, vulgar remarks; remarks, jokes or images with a sexual connotation conveyed by any means, including technological means.

Neglect:

- a) A situation in which a child's parents or the person having custody of the child do not meet the child's basic needs, either with regard to the child's physical or mental health, or fail to provide the child with appropriate supervision or support.
- b) A situation in which a person does not act with the care that a reasonable person would show in the same circumstances.

This may involve an act, an omission, or both.

Examples of neglect in a leisure context:

- asking a participant, or a person involved in the sector, to drop out of or take a break from school or to train or practise instead of attending school (e.g. competition schedule, arts/study program);
- knowing that a participant or player or a person involved in the community is not

- receiving the care that their state of mental or physical health requires and not intervening; knowing that a young person's conduct is unsafe (e.g. eating disorder or use of doping substances) and not intervening;
- knowing that a participant or person involved in the sector is or has been a victim of physical, psychological or sexual violence and doing nothing to protect them.

Bodily harm:

Physical maltreatment or bodily injury inflicted on someone under one's authority or in one's custody.

Violence:

Any intentional demonstration of verbal, written, physical, psychological or sexual force that causes distress and injures, hurts or oppresses a person by attacking their psychological or physical integrity or wellbeing, or their rights or property.

In a leisure context, violence can be committed by a person in authority (e.g. a trainer, a counsellor), by peers (partners, opponents), parents, representatives of groups, spectators, or a member of the medical or support team (fitness trainer, massage therapist, etc.). It can happen in changing rooms or in showers, in premises during an activity, a practice or an event, at the home of a trainer or counsellor, or during competitions, leisure initiations or outside trips.

Physical violence:

Any physical act by a parent or by any person involved in the sector in a situation of conflict with another person in the sector that, regardless of intent, risks compromising that person's physical or psychological integrity or wellbeing.

Psychological violence:

A situation in which a child is seriously and repeatedly subjected to behaviour by the child's parents or another person involved in the community that could cause harm to the child. Such behaviour includes in particular indifference, belittling, emotional rejection, excessive control, ostracization, threats and exploitation, particularly if the child is forced to engage in work or an activity disproportionate to the child's capacity.

Examples of psychological violence in a leisure setting:

- shouting insults (swearwords, vulgar epithets),
- making nasty or humiliating remarks to a participant,
- threatening a participant with physical injury or pretending to throw an object at them,
- systematically expelling or excluding a participant from an activity, rejecting or

- deliberately ignoring a participant (systematically ignoring their presence),
- forcing a participant to train despite an injury known to the training team,
- subjecting a participant to additional training leading to exhaustion or sickness,
- asking a participant to perform movements or technical gestures that are beyond their abilities, any other requests that could have negative effects on a participant's health (e.g. use of dangerous techniques, doping substances, etc.).

Sexual violence:

A sex act that is committed or attempted on a person who has not freely consented to the act, or is incapable of expressing consent or refusal. The term sexual violence includes **sexual assault**, **sexual abuse** and **sexual harassment**.

Examples of sexual violence in a leisure context:

- touching the private parts of a participant or a person involved in the sector,
- making offensive sexual jokes,
- making suggestive gestures,
- exposing one's private parts,
- touching someone's private parts,
- forcing a participant or person involved in the sector to perform sexual acts in exchange for favours or privileges, or as a result of peer manipulation,
- conducting a sexual conversation orally or in writing,
- exposing a participant or person involved in the community to sexual images.

Clarification

Bullying:

Any repeated direct or indirect behaviour, comment, act or gesture, whether deliberate or not, including in cyberspace, that occurs in a context where there is a power imbalance between the persons concerned and which causes distress and injures, hurts, oppresses, intimidates or ostracizes.

Bullying as understood in this appendix is part of the three types of violence defined above (physical violence, psychological violence and sexual violence).

APPENDIX B — CODE OF CONDUCT

As stated in the preamble, the Code of Conduct forms an integral part of this Policy and is binding on members of the ACQ.

It is therefore every ACQ member camp's responsibility to inform its clients and staff of the existence of the Policy and the Code of Conduct, and to include in its employment contract a declaration by which employees acknowledge that they have read and will abide by the Policy and Code of Conduct.

Every ACQ member camp also has a responsibility to ensure that failure to fulfil any obligation in this Policy and its Code of Conduct is subject to sanction. For a breach of the Policy, the sanction is imposed by the Integrity Protection Committee, and for a breach of the Code of Conduct, by the ACQ's or member camp's Board of Directors.

PART 1 — CODE OF CONDUCT FOR ADMINISTRATORS AND MANAGERS

Decision-making power lies in the hands of administrators and managers. They have the ultimate responsibility for the quality of leisure activities. An administrator or manager must ensure that the practice of activities is in line with educational and social values. To perform your role properly, as an administrator or manager you must:

- a) Recognize participants as the person that all your decisions or actions must benefit.
- b) Ensure that all participants are given an equal opportunity to participate in activities, regardless of age, gender, or skill level.
- c) Ensure that participants are supervised by skilled individuals who respect the principles valued by the organization.
- d) Promote accessibility, social and civic engagement, and the spirit of solidarity.
- e) Promote involvement of all employees and volunteers in training.
- f) Take all necessary measures to ensure participants' safety and integrity.
- g) Ensure that premises, facilities, equipment and the rules of activities meet the needs and match the interests of participants.
- h) Maintain good relationships and contacts with the media, the public, and all organizations or individuals associated with the organization.
- i) Plan all activities so that an intervener is never alone in a private closed location with a participant or someone involved in the sector. This location may be real (a room, a bedroom, changing room, car) or virtual (messaging app, social media).
- j) Use social media, the internet and other electronic media ethically and respectfully.
- k) Refrain from all alcohol or drug use in performing one's duties.
- l) Ensure that everyone is treated with respect and fairness.

PART 2 — CODE OF CONDUCT FOR COUNSELLORS AND ATTENDANTS

As a counsellor, you must first and foremost be aware of the importance of your role and the great influence you have on participants and those around you. You must take on a mission of education, motivation and of moral and social training for participants, and show yourself to be worthy of this responsibility. Your focus must be more on your participants' wellbeing and interests than on their results. You must consider leisure not as an end in itself but as an educational tool. To accomplish your task, as a counsellor or attendant you must:

Participants' health and physical safety

- a) Ensure that activity sites are safe at all times.
- b) Be prepared to respond quickly and appropriately in an emergency.
- c) Not put participants in situations that carry unnecessary risks or are not suited to their level.
- d) Seek to preserve participants' health, safety, integrity and wellbeing, present or future.
- e) Obtain parental authorization to drive a participant to or from an activity.

Be a responsible counsellor or attendant

- a) Use the authority associated with your position wisely and make decisions that are in participants' best interests.
- b) Help participants develop their self-esteem.
- c) Not take personal advantage of a situation or decision.
- d) Be aware of the limits of your knowledge/skills when making decisions, giving instructions, or taking action.
- e) Honour commitments, promises and objectives that have been agreed.
- f) Maintain the confidentiality and privacy of personal information and use it appropriately.
- g) Use social media, the internet and other electronic media ethically and respectfully.
- h) Refrain from using alcohol or drugs when performing your duties and make participants aware of problems arising from the use of these products and doping substances.

Ensure that everyone is treated with respect and fairness.

Integrity in relationships

- a) Avoid situations that may affect the objectivity, impartiality, or integrity of your

- duties as a counsellor or attendant.
- b) Refrain from any behaviour that constitutes abuse, harassment, neglect or violence, and any inappropriate relationship with a participant.
 - c) Generally, all activities should be planned so that you, as a counsellor or attendant, are never alone in a closed private location with a participant or someone involved in the sector. This location can be real (a room, a bedroom, changing room, a car) or virtual (messaging app, social media).

In particular:

- Electronic communications between a participant and a member of staff must include the parents if the participant is under 18, or legal guardians in the event of incapacity.
- Use group emails rather than private messages wherever possible.
- Counsellors and attendants must request the presence of another adult when a participant visits their office or their room.
- Counsellors must not drive a participant aged under 18 to or from an activity without having obtained the consent of their parents. Parental consent must be obtained for any exception.
- During stays, excursions or trips involving sleeping away, counsellors must ensure that members of staff stay close to participants' bedrooms.

Instructions on acceptable behaviour with participants

During physical contact and while monitoring participants...

- a) Try to remain within sight of others when you talk to a participant alone, or when you physically show encouragement or affection: holding hands, arm in arm, a hug from a participant, put your arms around participants' shoulders from the side rather than face to face.
- b) Listen to what participants express, and how they like or dislike being touched.
- c) Be accompanied by another adult on outings or hikes with participants.
- d) Report the outcome of any private intervention with a participant to management.
- e) If an examination of a child's genitals is necessary, entrust the task to health professionals; in an emergency, make sure to have another adult present.

For swimming...

- a) Never force a participant to undress.
- b) Respect every participant's modesty.
- c) Ensure that participants are watched at all times.
- d) Avoid being alone with a participant.
- e) Don't use the facilities at the same time as participants: use them in turns.
- f) Make sure there are two persons in sanitary facilities or, if this is impossible, notify your supervisor and allow visual access to the premises.

During transportation of children...

- a) Make sure that the driver has an appropriate driver's licence.
- b) Make sure that there are several adults on trips.
- c) Have the travel authorized by parents; the trip has a departure point and arrival point, and detours and stops should be avoided.
- d) Ensure that everyone takes their place on a seat that complies with provincial travel safety standards.
- e) Report any unusual event: inform camp management.

Behaviour to adopt during initiations

Given the nature of the activity, behaviour that is inappropriate or in poor taste ("hazing") can easily occur. This can lead to complaints, which could result in legal action.

Remember that initiation is a ceremony or a rite of passage marking entrance or acceptance into a group or society (from Wikipedia).

As a safeguard...

- a) Make sure you are thoroughly familiar with activities and their scheduled times.
- b) Designate a person with the power to intervene in case of inappropriate behaviour.
- c) Let new staff know that the activity will take place.
- d) Clearly define behaviour that is acceptable and behaviour that is inappropriate or irresponsible.
- e) Make sure your staff are thoroughly familiar with the definitions of bullying, violence and sexual assault.
- f) Make sure you have everyone's consent.
- g) Discuss limits with your team and make sure they are observed.

Ensure that participants understand that abuse, harassment, neglect, violence and inappropriate behaviour are not tolerated, and encourage participants to disclose and report such behaviours.

Respect

- a) Ensure that everyone is treated equally, regardless of age, descent, colour, race, citizenship, ethnicity, place of origin, language, belief, religion, athletic potential, disability, family status, marital status, gender identity, gender expression, gender or sexual orientation.
- b) Respect the dignity of each person when interacting with others.
- c) Observe the guidelines, rules and policies in force.

PART 3 — CODE OF CONDUCT FOR CONSULTANTS

No certification visit can take place without the presence of an ACQ consultant. Attentive observation of operations by a consultant will ensure quality and safety under the applicable standards.

To be an effective, competent consultant you must therefore:

- a) Protect participants' integrity and safety and the quality of their experience.
- b) Know the standards and their interpretation. Comply with stated rules.
- c) Apply standards objectively, impartially, fairly, and with good judgment.
- d) Communicate respectfully with managers you encounter.
- e) Be physically and mentally fit to complete the task.
- f) Avoid taking too much space or showing off to the detriment of participants.
- g) Plan all activities so that you are never alone in a private closed location with a participant or someone involved in the community. This location can be real (a room, a bedroom, changing room, a car) or virtual (messaging app, social media).
- h) Use social networks, the Internet, and other electronic media in an ethical and respectful manner towards colleagues, counsellors, trainers and managers, and do not use them to target a camp you have attended or another member camp.
- i) Refrain from all alcohol or drug use in the performance of your duties.
- j) Ensure that everyone is treated with respect and fairness.

PART 4 — CODE OF CONDUCT FOR PARTICIPANTS

To gain maximum benefit from a leisure activity, participants' attitude and behaviour should exude a pure spirit of cooperation and camaraderie.

The important point is the way that participants practise the activity. They must never lose sight of the fact that it is a leisure activity. For the greatest pleasure, as a participant you must:

- a) Play for fun, remembering that practising a leisure activity is not an end, but a means.
- b) Strictly observe the rules of the game and the spirit of cooperation charter.
- c) Show exemplary conduct on and off the activity site, refraining from insulting, vulgar or profane language.
- d) Respect trainers and counsellors and follow their instructions as long as they do not go against your wellbeing.
- e) Respect the property of others and refrain from theft or vandalism.
- f) Refuse and not tolerate the use of drugs, medication, or any stimulant.
- g) Know that no abuse, harassment, neglect, violence, or inappropriate behaviour is tolerated, and immediately report any such act committed against another person or yourself to a trainer, a counsellor, or any person in authority.
- h) Use social media, the internet and other electronic media ethically and respectfully.
- i) Ensure that everyone is treated with respect and fairness.

PART 5 — CODE OF CONDUCT FOR PARENTS

Parents concerned about their children's development must take an interest in their wellbeing and know the educational values underlying leisure activities. They must therefore collaborate in the use of leisure activities as a means of education and expression so that their child can gain the beneficial effects. To fulfil this duty, as a parent you must:

- a) Show respect to trainers, counsellors and managers.
- b) Behave appropriately and use appropriate language.
- c) Not engage in verbal violence towards participants, counsellors and managers, and support all efforts in this regard.
- d) Never forget that a child takes part in a recreational or leisure activity for their own pleasure, not that of the parents.
- e) Encourage your child to respect the rules of the game, or the rules put in place by the activity's organizer.
- f) Help your child to improve their skills and develop a spirit of cooperation and camaraderie.
- g) Assess your child's possibilities objectively, avoiding projections.
- h) Help your child to choose one or more activities to their liking.
- i) Never ridicule a child for making a mistake.
- j) By your example, encourage your child to respect the rules and resolve conflicts without aggression or violence.
- k) Use social media, the internet and other electronic media ethically and respectfully.
- l) Ensure that everyone is treated with respect and fairness.

APPENDIX C – CAMP CODE OF CONDUCT

Reference: Certification tool 5.5 — sample camp code of conduct

RULES OF CONDUCT

Interpersonal relations

- a) At all times, act respectfully towards:
 - a. Management
 - b. Staff
 - c. Clients and participants
 - d. Citizens
- b) Don't encourage a situation of bullying or violence through laughter, mocking, gestures or tacit acceptance.
- c) Allow everyone to take part in camp activities in an atmosphere of fun and collaboration.
- d) Show respect for the differences, strengths and limitations of everyone.
- e) Don't encourage inappropriate behaviour or remarks (violent, sexist, racist, etc.).

Language and communication

Use polite, respectful language.

Dress code

Dress decently. Clothing must be suitable for camp activities. Underwear and private parts must be covered at all times.

Resources, materials and equipment

- a) Take care when using or stowing all materials, equipment or facilities provided by the organization.
- b) Notify the camp of any breakage or defect observed.
- c) Don't destroy or damage other people's property.

Safety and supervision

Abide by the safety instructions provided.

Health, cleanliness and hygiene

Don't smoke, drink or consume legal or illegal drugs.

Role of employees who witness breaches of the camp code of conduct



Identify and report any situation apparently involving abuse of power, violence, threats, fear, rejection or any situation that creates unease in the group or team.



SANCTIONS FOR BREACHES OF THE CODE OF CONDUCT

- a) Verbal warning from the counsellor
- b) Note in file, temporary removal from activities and meeting with counsellor
- c) Meeting with the counsellor and camp manager. Parents notified
- d) Meeting with the camp manager and parents to draw up a plan of action aimed at a change in behaviour
- e) The participant is suspended and a meeting must be held between the participant, parents and camp manager before the participant can rejoin activities.
- f) The participant is expelled from activities for the remainder of the season.

***Depending on the seriousness of the offence, the scale of sanctions may be made more severe.**

Other items that may be included in the camp code of conduct

- Don't bring personal and/or valuable objects to camp.
- Don't bring mobile phones, tablets or other technological devices.
- Wear your camp T-shirt during outings.

APPENDIX D — PROCESS FOR MANAGING COMPLAINTS OF SEXUAL ABUSE, HARASSMENT, OR VIOLENCE

The Complaints Officer must report all complaints of sexual abuse, sexual harassment or sexual violence where the alleged victim is a minor to the Director of Youth Protection (DYP), regardless of the seriousness or admissibility of the complaint. If the alleged victim is an adult, the Complaints Officer can report the situation directly to the police department.

The alleged perpetrator of the sexual abuse, harassment or violence will not be sent a copy of the complaint.

All complaints are handled with due regard for the confidentiality of the alleged victim's identity. However, if it is not possible to process the complaint without the alleged victim being identified due to the nature of the information provided, the alleged victim will be notified. The alleged victim may choose to remain anonymous.

If any of the persons involved in a complaint of sexual abuse, harassment, neglect or violence is an employee of the organization concerned, the Complaints Officer immediately sends a copy of the complaint to the CEO or president of the organization so that the case can also be handled by its human resources manager, if need be. If the Complaints Officer is aware that any of the persons involved in the complaint is or could be an employee of a member camp, the Complaints Officer advises the complainant and the alleged victim, in writing, that they can also file a complaint directly with the organization concerned, as soon as the Officer rules on the admissibility of the complaint. If the complaint is ruled non-admissible, it can be addressed to the ACQ if a member camp is concerned.

On receiving a complaint of sexual abuse, harassment or violence, the Complaints Officer may contact the complainant and the alleged victim for additional information to assess whether the complaint appears serious and admissible. The Complaints Officer must take into consideration the nature of the facts, their seriousness, and the probative value of the allegations or the person concerned. In the case of a complaint reported to the DYP as provided for in Section 5 above, the Complaints Officer awaits the DYP's decision on the admissibility of the complaint and complies with it.

Where there is reasonable cause to believe that a complaint of sexual abuse, harassment or violence is serious, the Complaints Officer sends a message by email or registered mail to the complainant and the alleged victim, as applicable, confirming

that the complaint is admissible and will be processed. If not, the Complaints Officer sends a message to the complainant and the alleged victim in the same way, informing them that the complaint has been rejected and setting out the reasons for the decision. If the alleged perpetrator of sexual abuse, harassment or violence is an employee of an ACQ member camp, the Officer notifies them as soon as possible that they are the subject of an admissible complaint of sexual abuse, harassment or violence and that

they may be excluded from all ACQ-recognized programs and activities for an indefinite period. The Officer also notifies the ACQ that an employee of one of its members may be excluded following a complaint of sexual abuse, harassment or violence. At this stage, the Complaints Officer does not conduct a formal investigation so as not to compromise or interfere with the work of the DYP or the police.

The indefinite exclusion confirmed by the Complaints Officer remains in effect until the Integrity Protection Committee has reached a decision regarding a request for reassessment filed by the alleged perpetrator of sexual abuse, harassment or violence. Before submitting a request to the Committee, the alleged perpetrator must first satisfy the Complaints Officer, by means of a written request, that there are reasonable grounds for a reassessment of the file (for example, the end of the investigation conducted by the police and the DYP, a court ruling, etc.).

In analyzing the request for reassessment, the Complaints Officer may contact the complainant and the alleged victim for further information. In the presence of reasons that, at first sight, support a reassessment of the file, the Officer sends a message to the alleged perpetrator of sexual abuse, harassment or violence and the complainant (and the alleged victim, where applicable) by email or registered mail to inform them of the situation. This must be done within ten (10) days of receipt of the request unless exceptional circumstances exist.

The request for reassessment is then forwarded for a decision to the Integrity Protection Committee (**Appendix F**), with appropriate modifications. The Committee may recommend a disciplinary sanction to the organization concerned; it can also rule on the outcome of the administrative measure taken against the alleged perpetrator of sexual abuse, harassment or violence.

If the complainant makes representations to the Integrity Protection Committee at a hearing, they thereby agree to have their name disclosed to the other parties involved. In all cases, no copy of the complaint for sexual abuse, harassment or violence is sent to the parties.

If the alleged perpetrator of sexual abuse, harassment or violence is not an employee of an ACQ member camp, the Complaints Officer then determines what administrative measure, if any, can be taken by the organization concerned and informs the complainant and the alleged victim.

Decisions of the Complaints Officer are final and cannot be appealed.

APPENDIX E — PROCESS FOR MANAGING COMPLAINTS OF NON-SEXUAL ABUSE, HARASSMENT, NEGLIGENCE OR VIOLENCE

If any of the persons involved in a complaint of non-sexual abuse, harassment, neglect or violence is an employee of the organization concerned, the Complaints Officer immediately sends a copy of the complaint to the CEO or president of the organization so that the case can also be handled by its human resources manager, if need be, or to the president if the complaint involves the CEO. If the Complaints Officer is aware that any of the persons involved in the complaint is or could be an employee of a member, the Complaints Officer advises the complainant and the alleged victim, in writing, that they can also file a complaint directly with the employer concerned, as soon as the Officer rules on the admissibility of the complaint.

On receiving a complaint of non-sexual abuse, harassment, neglect or violence, the Complaints Officer may contact the complainant or the alleged victim for additional information to assess whether the complaint is admissible. If the complaint appears admissible, the Officer confirms by email or registered mail to the complainant and the alleged victim, if applicable, that the complaint is admissible, within ten (10 days) of its receipt unless there are exceptional circumstances. If not, the Complaints Officer sends a message to the complainant and the alleged victim in the same way, informing them that the complaint has been rejected and setting out the reasons for the decision.

On receiving a complaint of non-sexual abuse, harassment, neglect or violence, the Complaints Officer, where there is reasonable cause to believe that the alleged victim's safety is compromised by the alleged perpetrator of non-sexual abuse, harassment, neglect or violence, may recommend that the ACQ, as an administrative measure, exclude the alleged perpetrator from all ACQ-recognized programs and activities for an indefinite period. The exclusion applies to all levels and remains in effect until the Integrity Protection Committee has reached a decision following a hearing of the complaint. The member concerned is informed of the decision by email or registered mail as soon as possible.

The Complaints Officer must take into consideration the nature of the facts, their seriousness, and the probative value of the allegations or the person concerned. The Officer may also contact the DYP if the complaint involves an alleged victim who is a minor.

The Complaints Officer must report to the DYP any complaint of violence or physical abuse that the Officer has deemed admissible and has retained when the alleged victim is a minor and when the Officer has reasonable cause to believe that the alleged victim's safety is compromised.

If the alleged perpetrator of non-sexual abuse, harassment, neglect or violence is not a member of the ACQ, the Complaints Officer then determines what administrative measure, if any, can be taken by the ACQ and informs the complainant and the alleged victim accordingly.

Before forwarding the file to the Integrity Protection Committee (**Appendix F**) to initiate the formal process, the Complaints Officer may, if appropriate, propose an informal resolution process to the complainant, the alleged victim and the alleged perpetrator of non-sexual abuse, harassment, neglect or violence. The goal of the informal process is to seek solutions to the problem, with the good faith participation of all, and not to establish whether non-sexual abuse, harassment, neglect or violence has occurred. This mediation process can be conducted by an internal or external mediator if the people involved consent.

All discussions during the informal process remain confidential. Only the collaboration agreement resulting from the mediation is recorded in writing, signed by the parties, and handed to the Complaints Officer. If the parties do not agree to mediation or if mediation fails, the handling of the complaint continues with the formal investigation process.

Having ruled that a complaint is admissible, the Officer forwards a copy of the complaint to the Integrity Protection Committee so that a hearing between the parties involved can be held, unless the matter has been resolved through mediation. Decisions of the Complaints Officer are final and cannot be appealed.

APPENDIX F – COMPOSITION AND OPERATION OF THE INTEGRITY PROTECTION COMMITTEE

Composition of the Integrity Protection Committee

The Integrity Protection Committee consists of three (3) persons selected from a list of qualified candidates by the Complaints Officer. These individuals cannot be employees or administrators of the ACQ.

Those sitting on the Integrity Protection Committee must not be in a conflict-of-interest situation with parties involved in a complaint, in order to maintain the impartiality of the process.

To conduct the hearing, the members of the Integrity Protection Committee choose which of them will act as Chair of the Committee.

The Chair of the Committee sends notice of the hearing to the complainant, the alleged victim and the respondent (the alleged perpetrator of non-sexual abuse, harassment, neglect or violence) by email or registered mail at least twenty (20) days before the hearing. The notice of the hearing addressed to the respondent must set out the reasons why they are being summoned. A copy of this Policy and the by-laws of the ACQ must be attached to the notice.

The committee can sit anywhere in Québec as needed. The hearing may also be held by videoconference or by conference call.

Hearing procedure

The hearing is held behind closed doors.

The Committee first hears the complainant's evidence, followed by the alleged victim's evidence. It then hears the respondent's evidence. Last, it hears the representations of the complainant, the alleged victim and the respondent. Each party is responsible for ensuring that their witnesses are present, must bear the costs of their witnesses, and must make sure to have enough copies of documentation they intend to use for all participants at the hearing (6 in total).

The Committee may agree to postpone a hearing if it finds that the reasons for postponement given by a party are serious.

When a duly summoned respondent is absent at the hearing, the Committee renders a decision based only on the evidence presented to it by either of the parties present. If neither the complainant nor the alleged victim are present at the hearing, despite having been duly summoned, or if they both are unable to provide evidence to support the complaint, the Committee must dismiss the complaint for lack of evidence.

Rules of evidence

- a) Hearsay evidence is not admissible.
- b) The parties may testify themselves or be examined by their representative.
- c) Witnesses of the parties may testify themselves or be examined by their representative.
- d) Cross-examination by the opposing party is not allowed.

Decision of the Integrity Protection Committee

The Committee has twenty (20) days to deliver its recommendation to the ACQ by email or registered mail.

The ACQ has ten (10) days to ratify the Committee's recommendation and to respond to the Committee by email or registered mail.

Upon receipt of the ACQ's decision, the Committee has five (5) days to forward the decision to the parties by email or by registered mail.

The Committee may uphold or dismiss the complaint at the end of its hearing. If the complaint is upheld, the Committee can recommend to the ACQ one or other or a combination of the following sanctions:

- a) Place a reprimand on the member's or the respondent's file.
- b) Impose on the member or the respondent a penalty of \$ 100.00 to \$2,000.00, to be paid to the ACQ within the time determined by the Committee. If the member fails to pay the set penalty to the ACQ within the allotted time, the member's membership of the ACQ is automatically suspended until it has fulfilled its obligation.
- c) Impose conditions upon and require undertakings from the member or the respondent.
- d) Require the member or the respondent to take part, at their own expense, in a training course specified by the Committee within the time frame it determines, in order to maintain its membership status. If the member or respondent is unable to prove to the ACQ that the training was completed within the time limit, the member's or respondent's membership of the ACQ is automatically suspended from the day after the deadline until they have fulfilled the obligation and are able to prove it.
- e) Restrict the approved activities and programs in which the member or respondent can participate for the duration it determines.
- f) Suspend ACQ member status for a maximum period of twelve (12) months.
- g) Revoke the member's membership of the ACQ.

The Integrity Protection Committee's decision is final and cannot be appealed.

The ACQ at all times keeps the right to initiate all necessary proceedings against the respondent in order to force the payment of a penalty.