



POLICIES AND PROCEDURES MANUAL

Section Three | **Code of Conduct & Ethics**

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1 Code of Conduct & Ethics

1.1 Definitions

1.1.1 The following terms have these meanings in this Code:

- a) *“Governing Body”* – The organization that has the authority to manage a judicial process as per the policies of the governing body. Governing body may refer to Canada Soccer, SSA, or Member Organizations, clubs/zones or entities that are members of SSA.
- b) *“Match Official/Referee”* – Individuals who perform as referees, assistant referees, 4th officials, referee administrators, referee assignors, referee supervisors, referee mentors, referee leads, referee instructors and referee assessors during sanctioned soccer activities.
- c) *“Members”* – All members defined by SSA by-laws and for the purposes of this policy shall also include parents, guardians and caregivers of individual members and spectators at SSA events and SSA sanctioned competitions.
- d) *“Organizers”* - Anyone performing an activity connected with soccer at a Member Organization or Entity, regardless of title, type of activity (administrative, sporting or any other) and duration of the activity. Includes all directors, officers, committee members, coaches, trainers, match officials, diversity officers, persons in charge of safety, and any other person responsible for technical, medical and/or administrative matters, members, clubs or leagues, as well as all other persons obliged to comply with SSA and Canada Soccer by-laws regardless of whether they are paid or volunteers.
- e) *“SSA”* – Saskatchewan Soccer Association
- f) *“Team Personnel”* - All supervisory team personnel including but not limited to coaches, assistant coaches, managers, trainers and other medical staff, and gender representative personnel or anyone that wishes to have access to the field of play.

1.2 Purpose

- 1.2.1 The purpose of the Code of Conduct and Ethics (hereinafter referred to as the Code) is to ensure a safe and positive environment (within SSA’s programs, activities, office, work environment, and events) by making members aware that there is an expectation, at all times, of appropriate behaviour consistent with SSA’s core values. SSA supports equal opportunity, prohibits discriminatory practices, and is committed to providing an environment in which all individuals are treated with respect.
- 1.2.2 As per the Saskatchewan Employment Act and Saskatchewan Occupational Health and Safety Regulations, SSA is obligated to ensure workers are not exposed to abuse or harassment with respect to any matter or circumstance arising out of their employment; for the purposes of the SSA Code of Conduct and Ethics this protection also extends to all organizer members who volunteer or may receive payment in service to the Association and/or its Member Organizations.
- 1.2.3 This Code is not intended to specifically outline every instance of misconduct. As such, misconduct not specifically listed in this Code which is not in line with the values of SSA or the purpose of this Code, may still constitute a breach of the Code and be subject to sanctions.
- 1.2.4 As stated in the SSA By-laws, SSA Member Organizations are responsible to have bylaws, policies and regulations in place that meet the standards set by this policy; in the absence of such written policies, SSA members shall be bound by the principles and standards set out herein.

1.3 Application of this Code

- 1.3.1 A member who violates this Code may be subject to sanctions pursuant to SSA's *Formal Complaints Policy*. A member who violates this Code during a competition may be ejected from the competition or the playing area, the match official may delay the competition until the member complies with the ejection, and the member may be subject to any additional discipline associated with the particular competition as per SSA's *Event Discipline Procedure*.
- 1.3.2 An employee of SSA who violates this Code will be subject to appropriate disciplinary action according to the terms of SSA's *Personnel Policy* and/or employment agreement.

1.4 Responsibilities

- 1.4.1 Members have a responsibility to:
- a) Comply, at all times, with SSA's by-laws, policies, procedures, directives, and rules and regulations
 - b) Work in a spirit of partnership to collaborate with SSA and all its members and stakeholders to align efforts to achieve the mission of the SSA
 - c) Resolve issues that may be in dispute in a professional and civil manner
 - d) Maintain and enhance the dignity and self-esteem of members, organizers and other individuals by:
 - i. Demonstrating respect to individuals regardless of body type, physical characteristics, athletic ability, age, ancestry, colour, race, citizenship, ethnic origin, place of origin, creed, disability, family status, marital status, gender identity, gender expression, sex, and sexual orientation
 - ii. Complying with Canada Soccer's Rules and Regulations specifically, but not limited to, (Section 3, page 2) the Canada Soccer Code of Conduct and Ethics and FIFA's Code of Ethics (Section 23, page 20)
 - iii. Directing comments or criticism appropriately and avoiding public criticism of members or organizers
 - iv. Consistently demonstrating the spirit of sportsmanship, sport leadership, and ethical conduct
 - v. Consistently treating individuals fairly and reasonably
 - vi. Adhering to the *FIFA Laws of the Game* and the spirit of those rules
 - vii. Demonstrating respect for the Fair Play Principles of Sport, which are:
 - a Respect for both the letter and spirit of the rules;
 - b Respect for match officials and their decisions;
 - c Respect for opponents, including modesty in victory and composure in defeat;
 - d Facilitation of access to sport; and,
 - e Maintenance of self-control at all times.
 - viii. Refraining from the use of power or authority in an attempt to coerce another person to engage in inappropriate activities
 - ix. Promoting the sport in the most constructive and positive manner possible
 - x. Respecting the property of others and not willfully causing damage
 - xi. Adhering to all federal, provincial, municipal and host country laws

1.5 Integrity in Sport

1.5.1 Members have a responsibility to:

- a) Abstain from the non-medical use of drugs or the use of performance-enhancing drugs or methods and adhere to the requirements of the Canadian Anti-Doping Program
- b) Respect any penalty enacted pursuant to a breach of the Canadian Anti-Doping Program, whether imposed by the SSA or any other sport organization
- c) Refrain from associating with any person for the purpose of coaching, training, competition, instruction, administration, management, athletic development, or supervision of the sport, who has violated an anti-doping rule and is serving a sanction involving a period of ineligibility imposed pursuant to the Canadian Anti-Doping Program and/or the World Anti-Doping Code
- d) Refrain from consuming alcohol, tobacco products, marijuana in excess and illicit drugs while participating in the SSA programs, activities, competitions, or events
- e) Refrain from consuming alcohol, tobacco products, and marijuana where minors are present
- f) Reject and condemn all forms of bribery and corruption
- g) Refrain from accepting or giving gifts or other benefits that influence an act that is related to their official activities. If in doubt, gifts shall not be offered or accepted
- h) Refrain from offering or accepting cash, other than reasonable per diems, expense reimbursement or salaries
- i) Refrain from forging or falsifying a document nor use such
- j) Ensure information obtained while carrying out one's duties is treated as confidential if that information is received or can be understood as confidential.
- k) Respect the confidentiality of the information after the relationship with the SSA ceases
- l) Ensure transparency in all actions and decisions
- m) Remain politically neutral
- n) Refrain from betting in connection with soccer and its derivatives and not tolerate any form of manipulation of match results – whether for financial, sporting or political gain, and ensure information in any form that is not publically available is not used for the above purposes for oneself or another party

1.6 Unacceptable Actions

1.6.1 Members have a responsibility to:

- a) Refrain from any behavior that constitutes aggression or abuse, where aggression or abuse is directed towards organizers. Types of behaviour that are applicable to this section include, but is not limited to:
 - i. Language (whether verbal or written) that may cause organizers to feel afraid, threatened or abused and may include threats, personal verbal abuse, derogatory remarks and rudeness
 - ii. Offensive or intimidating phone calls or emails
 - iii. Personal attacks or publicly questioning a person's integrity
 - iv. Overly aggressive or intimidating words or conduct including confrontation in-person or in writing
 - v. Inflammatory statements, remarks of a racial or discriminatory nature and unsubstantiated allegations

- b) Refrain from any behavior that constitutes unreasonable demands; unreasonable demands are demands which start to (or when complying with the demand would) impact excessively on the work of organizers, or when dealing with the matter take up an excessive amount of time and in so doing, disadvantages other members. Types of behaviour that are applicable to this section include, but are not limited to:
 - i. Repeatedly demanding responses within an unreasonable timeframe
 - ii. Demanding responses from several members on the same subject
 - iii. Insisting on seeing or speaking to a particular organizer when that is not possible or when it has been confirmed they are unavailable
 - iv. Repeatedly changing the substance of an enquiry or complaint or raising unrelated concerns
 - v. Repeatedly posing a question when a response has already been given

- c) Refrain from any behaviour that constitutes unreasonable levels of contact; unreasonable levels of contact is defined as when the amount of time spent talking to an individual on the telephone, or responding to, reviewing and filing emails or written correspondence impacts SSA's ability to deal with the matter, or SSA's responsibility for carrying out tasks relating to other members. Types of behaviour that are applicable to this section include, but are not limited to:
 - i. When a large number of calls or emails are received from the same person in one day
 - ii. When a person repeatedly makes long telephone calls or inundates organizers with emails or copies of information that have been already sent or that are irrelevant to the substance of the complaint or enquiry
 - iii. Repeated offensive or intimidating phone calls or written comments or emails
 - iv. Repeated requests for information or action when clarification has already been provided
 - v. When parties involve un-related parties in discussions on email
 - vi. If a person is directing the behavior of staff or volunteers without proper authority or through demands, implied threats or threat of negative consequences and/or if a person is intervening in SSA activities without proper authority
 - vii. Comments or conduct that is known or ought reasonably to be known to be unwelcome;
 - viii. Hypercritical approach when working with organizers
 - ix. Repeated disregard to SSA directives
 - x. Making false statements in person, in written form or in public

1.7 Harassment

1.7.1 Members have a responsibility to:

- a) Refrain from any behaviour that constitutes **harassment**, where harassment is defined according to the [Canadian Human Rights Commission](#) as a form of discrimination which involves any unwanted physical or verbal behaviour that offends or humiliates. Generally, harassment is behavior that persists over time or serious one-time incidents.
- b) Types of behaviour that constitute harassment include, but are not limited to:
 - i. Written or verbal abuse, threats, or outbursts
 - ii. The display of visual material which is offensive or which a reasonable person ought to know is offensive in the circumstances
 - iii. Unwelcome remarks, jokes, comments, innuendo, or taunts
 - iv. Leering or other suggestive or obscene gestures
 - v. Condescending or patronizing behaviour which is intended to undermine self-esteem, diminish performance or adversely affect conditions of participation

- vi. Practical jokes which cause awkwardness or embarrassment, endanger a person's safety, or negatively affect performance
 - vii. Any form of hazing
 - viii. Retaliation or threats of retaliation against an individual who reports harassment
 - ix. Bullying
 - x. Offensive or intimidating phone calls, text messages, voice mails, or emails
 - xi. Displaying or circulating offensive pictures, photographs or materials in printed or electronic form
 - xii. Psychological abuse
 - xiii. Discrimination
 - xiv. Words, actions, or an environment which are known or should reasonably be known to be offensive, embarrassing, humiliating, demeaning or intimidating
 - xv. Behaviours such as those described above that are not directed towards a specific individual or group but have the same effect of creating a negative or hostile environment
- c) Refrain from any behaviour that constitutes **violence**, where violence is defined as the exercise of physical force that causes or could cause physical injury; an attempt to exercise physical force that could cause physical injury; or a statement or behaviour that it is reasonable to interpret as a threat to exercise physical force. Types of behaviour that are applicable to this section include, but are not limited to:
- i. Verbal threats to attack
 - ii. Sending or leaving threatening notes, text messages, voice mails, or emails
 - iii. Making threatening physical gestures
 - iv. Wielding a weapon
 - v. Hitting, pinching or unwanted touching which is not accidental or deemed to be generally accepted as a part of sport participation
 - vi. Throwing an object in the direction of someone
 - vii. Blocking normal movement or physical interference, with or without the use of equipment
 - viii. Any attempt to engage in the type of conduct outlined above
- d) Refrain from any behaviour that constitutes **sexual harassment**, where sexual harassment is defined as unwelcome sexual comments and sexual advances, requests for sexual favours, or conduct of a sexual nature. Types of behaviour that constitute sexual harassment include, but are not limited to:
- i. Sexist jokes
 - ii. Sexual violence
 - iii. Display of sexually offensive material
 - iv. Sexually degrading words used to describe a person
 - v. Inquiries or comments about a person's sex life
 - vi. Unwelcome sexual flirtations, advances, requests, invitations or propositions
 - vii. Inappropriate sexual touching, advances, suggestions or requests
 - viii. Unwanted physical contact including, but not limited to, touching, petting, pinching, or kissing
 - ix. Physical or sexual assault

1.8 Board/Committee Members and Staff

- 1.8.1 SSA's directors, committee members, and staff must also:
- a) Function primarily as a member of the staff, board and/or committee(s) of SSA; not as a member of any other particular member or constituency and comply with Canada Soccer's Requirements for Good Governance
 - b) Act with honesty and integrity and conduct themselves in a manner consistent with the nature and responsibilities of SSA's business and the maintenance of members' confidence
 - c) Ensure that SSA's financial affairs are conducted with due regard for all fiduciary and operational responsibilities
 - d) Conduct themselves openly, professionally, lawfully and in good faith in the best interests of SSA
 - e) Be independent and impartial and not be influenced by self-interest, outside pressure, expectation of reward, or fear of criticism
 - f) Behave with decorum appropriate to both circumstance and position and be fair, equitable, considerate, and honest in all dealings with others
 - g) Keep informed about SSA's activities, the provincial sport community, and general trends in the sport in which they operate
 - h) Exercise the degree of care, diligence, and skill required in the performance of their duties pursuant to the laws under which SSA is incorporated
 - i) Respect the confidentiality appropriate to the business at hand
 - j) Ensure that members are given sufficient opportunity to express opinions, and that all opinions are given due consideration and weight
 - k) Respect the decisions of the majority and resign if unable to do so
 - l) Commit the time to attend meetings and be diligent in preparation for, and participation in, discussions at such meetings
 - m) Have a thorough knowledge and understanding of all the SSA governance documents
 - n) Conform to the bylaws and policies approved by SSA, in particular this *Code of Conduct and Ethics* as well as the *Conflict of Interest Policy* and *Confidentiality Policy*

1.9 Team Personnel

- 1.9.1 Team personnel (which includes, but not limited to, all coaches, assistant coaches, and managers, gender representatives, medical or other personnel in a position of influence on the athlete(s)) have many additional responsibilities. The team personnel-athlete relationship is a privileged one and plays a critical role in the personal, sport, and athletic development of the athlete. Team personnel must recognize the power inherent in the position of team personnel and respect and promote the rights of all participants in sport. This is accomplished by establishing and following procedures for confidentiality (right to privacy), informed participation, and fair and reasonable treatment. Team personnel have a special responsibility to respect and promote the rights of participants who are in a vulnerable or dependent position and less able to protect their own rights. This applies equally to the relationship between match officials and their coaches, instructors, assessors, and mentors. Team personnel must also:
- a) Ensure a safe environment by selecting activities and establishing controls that are suitable for the age, experience, ability, and fitness level of the involved athletes
 - b) Prepare athletes systematically and progressively, using appropriate time frames and monitoring physical and psychological adjustments while refraining from using training methods or techniques that may harm athletes

- c) Avoid compromising the present and future health of athletes by communicating and cooperating with sport medicine professionals in the diagnosis, treatment, and management of athletes' medical and psychological treatments
- d) Support the team personnel of a training camp, provincial team, or national team, should an athlete qualify for participation with one of these programs
- e) Provide athletes (and the parents/guardians/caregivers of athletes) with the information necessary to be involved in the decisions that affect the athlete
- f) Act in the best interest of the athlete's development as a whole person
- g) Respect other team personnel
- h) Meet the highest standards of credentials, integrity and suitability, including but not limited to such considerations established by SSA's *Screening Policy*
- i) Report any ongoing criminal investigation, previous convictions, or existing bail conditions, including those for violence, child pornography, or possession, use, or sale of any illegal substance
- j) Under no circumstances provide, promote, or condone the use of drugs (other than properly prescribed medications) or performance-enhancing substances and, in the case of minors, alcohol, marijuana and/or tobacco
- k) Respect athletes playing with other teams and, in dealings with them, not encroach upon topics or actions which are deemed to be within the realm of 'coaching', unless after first receiving approval from the coaches who are responsible for the athletes
- l) Not engage in a sexual relationship with an athlete under 18 years old, or an intimate or sexual relationship with an athlete over the age of 18 if in a position of power, trust, or authority over the athlete
- m) Dress professionally, neatly, and inoffensively
- n) Use inoffensive language, taking into account the audience being addressed
- P) Act professionally at all times

1.10 Athletes

1.10.1 Athletes must also:

- a) Report any medical problems in a timely fashion, when such problems may limit their ability to travel, practice, or compete; or in the case of carded athletes, interfere with the athlete's ability to fulfill requirements under the Athlete Assistance Program
- b) Participate and appear on-time, well-nourished, and prepared to participate to their best abilities in all competitions, practices, training sessions, tryouts, tournaments, and events
- c) Properly represent themselves and not attempt to participate in a competition for which they are not eligible by reason of age, classification, or other reason
- d) Adhere to SSA's rules and requirements regarding clothing and equipment
- e) Never ridicule a participant for a poor performance or practice
- f) Dress in a manner representative of SSA; focusing on neatness, cleanliness, and discretion
- g) Act in accordance with SSA's policies and procedures and, when applicable, additional rules as outlined by team personnel
- h) Act in a sportsmanlike manner and not engage in violent behaviour, foul language, or offensive gestures

1.11 Match Officials

1.11.1 Match officials must also:

- a) Conduct themselves with dignity both on and off the field of play and shall, by example, seek to inspire the principles of fair play
- b) Not cause Canada Soccer, Saskatchewan Soccer or any regional referees association to become involved in any controversial matters, and shall abide by the rules and regulations of the provincial soccer association and the referee's own association
- c) Adhere to all standards and directives established by the international (FIFA), national (Canada Soccer) and provincial (SSA) soccer association, and Member Organization
- d) Be neat in appearance and maintain a high level of physical and mental fitness
- e) Study and enforce the current Laws of the Game and any event-specific rules and regulations
- f) Perform their designated duties, including attending organized clinics and lectures, etc. and assist their colleagues in upgrading and improving their standards of officiating, instructing and assessing
- g) Honour any appointments accepted, unless unable to do so by virtue of illness or personal emergency. Appointments are prioritized as FIFA - Canada Soccer – SSA – Local MO
- h) Not publicly criticize other match officials, Canada Soccer, Saskatchewan Soccer or other provincial/territorial soccer associations, or any referees association. This includes statements on social media platforms
- i) Not make any statement to the media (newspaper, television, radio, social, etc.) related to a game in which the match official has officiated, or to the performance of the players or other match officials
- j) Not accept any appointment to officiate in any competitive game involving a team in the same age group and gender division in the same league to which the match official is directly affiliated as a team personnel
- k) Not accept an appointment to officiate in any provincial championship game involving a team or club to whom the match official is directly affiliated as a player, team personnel, and organizer
- l) Not accept any appointment to officiate in any competitive game in which an immediate member of their family by marriage or common law is a registered player or team personnel. An immediate member of the family is a parent/guardian/caregiver, a spouse, child, or sibling
- m) Not accept any appointment to officiate in unsanctioned events
- n) Be fair, equitable, considerate, independent, honest, and impartial in all dealings with others
- o) When writing reports, set out the true facts and not attempt to justify any decisions
- p) Report any approach to fix the result of a match

1.12 Spectators and Parents/Guardians/Caregivers

1.12.1 Spectators and parents/guardians/caregivers must also:

- a) Encourage athletes to play by the rules and to resolve conflicts without resorting to hostility or violence
- b) Never ridicule a participant for making a mistake during a performance or practice
- c) Provide positive comments that motivate and encourage participants' continued effort
- d) Respect the decisions and judgments of match officials and encourage athletes to do the same
- e) Respect and show appreciation to all competitors, and to the team personnel, match officials, and other volunteers who give their time to the sport
- f) Refrain from entering the training or competition areas and from interfering with any activities.

2 Code of Conduct to Protect Children (10 20)

2.1 Introduction

- 2.1.1 SSA has developed the following Child Protection Code of Conduct to guide our employees/volunteers in their interactions with children. The safety, rights and well-being of children we serve are at the core of our daily programs. We nurture supportive relationships with children while balancing and encouraging appropriate boundaries.
- 2.1.2 Why is a Child Protection Code of Conduct is important? Our organization is committed to ensuring all children are protected and safe. A Code of Conduct is an important part of creating safe environments for children. The safety, rights and well-being of children participating in our programs is a priority in our daily operations. The intent of the Code of Conduct is to guide staff/volunteers in developing healthy relationships with the children involved in sport programs delivered by SSA and Member Organizations and to model appropriate boundaries for children.

2.2 Treating Children With Dignity and Maintaining Boundaries

- 2.2.1 All staff/volunteers must:
- Treat all children with respect and dignity
 - Establish, respect, and maintain appropriate boundaries with all children and families involved in activities or programs delivered by the organization
- 2.2.2 It is important to monitor your own behaviour towards children, and pay close attention to the behaviour of your peers to ensure that behaviour is appropriate and respectful, and will be perceived as such by others.
- 2.2.3 All of your interactions and activities with children:
- should be known to and approved by the board, where applicable, and the parents of the child,
 - tied to your duties, and
 - designed to develop the child's skills in the soccer program
- 2.2.4 Always consider the child's reaction to any activities, conversations, behaviour or other interactions. If at any time you are in doubt about the appropriateness of your own behaviour or the behaviour of others, you should discuss it with the designated person within your organization.
- 2.2.5 Examples of unacceptable behaviour toward a child:
- Embarrassing
 - Shaming
 - Blaming
 - Humiliating, and/or
 - Putting them down

2.3 What Constitutes Inappropriate Behaviour

- 2.3.1 The action taken by the organization will depend upon the nature of the incident; however, it is important for the organization to distinguish between **illegal behaviour** and **inappropriate behaviour**.

- 2.3.2 If you are unsure whether the behaviour you witnessed or heard about is illegal behaviour or inappropriate behaviour, then you must discuss the issue with the designated person within your organization who will support you through the process.
- 2.3.3 **Inappropriate behaviour** includes:
- a) Inappropriate Communication. Communication with a child or his/her family outside of the context of duties for the organization, regardless of who initiated the exchange. For example:
 - i. Personal phone calls not tied to duties with the child;
 - ii. Electronic communications (email, text message, instant message, online chats, social networking including “friending”, etc.) not tied to duties with the child;
 - iii. Personal letters not tied to duties with the child; and
 - iv. Excessive communications (online or offline).
 - b) Inappropriate Contact: spending unauthorized time with a child outside of designated duties with the organization.
 - c) Favouritism: singling out a child or certain children and providing special privileges and attention, but not to include variations in playing time based on skills, strategy or player commitment (for example, paying a lot of attention to, giving or sending personalized gifts, or allowing privileges that are excessive, unwarranted or inappropriate).
 - d) Taking Personal Photos/Videos outside of sport duties: using a personal cell phone, camera or video to take pictures of a child, or allowing any other person to do so, as well as uploading or copying any pictures you may have taken of a child to the Internet or any personal storage device. Pictures taken as part of your job duties are acceptable, however, the pictures are to remain with the organization and not be used by you in a personal capacity.
 - e) Telling sexual jokes to a child, or making comments to a child that are or is in any way suggestive, explicit or personal.
 - f) Showing a child material that is sexual in nature, including, signs, cartoons, graphic novels, calendars, literature, photographs, screen savers, or displaying such material in plain view of a child, or making such material available to a child.
 - g) Intimidating or threatening a child.
 - h) Making fun of a child.
- 2.3.4 Inappropriate behaviour will not be tolerated, especially as it relates to the well-being of the children involved in activities or programs delivered by the Member Organization.
- 2.3.5 Internal Reporting: everyone is obligated to report inappropriate behaviour to their Member Organization or incidents that they become aware of, whether the behaviour or incidents were personally witnessed or not. Whether or not a particular behaviour or action constitutes inappropriate behaviour will be a matter determined by a formal complaint process (see Section 4).
- 2.3.6 In the case of inappropriate behaviour, if:
- a) multiple behaviours were reported,
 - b) inappropriate behaviour is recurring, or
 - c) the reported behaviour is of serious concern,
- the organization may refer the matter to a child welfare agency or police.

2.4 Illegal Behaviour

- 2.4.1 All forms of abuse identified are open to intervention according to *The Child and Family Services Act*, including:
- a) Physical Abuse;
 - b) Sexual Abuse and Exploitation;
 - c) Physical Neglect;
 - d) Emotional Maltreatment;
 - e) Exposure to Domestic or Interpersonal Violence; and
 - f) Failure to provide Essential Medical Treatment.
- 2.4.2 External Reporting: The Child Abuse Protocol makes clear that all citizens have a “Duty to Report” suspicions of child abuse and neglect and in all cases where the safety of a minor is in question, the guidelines of [Saskatchewan’s Child Abuse Protocol](#) and other applicable provincial acts shall be adhered to (for details refer to Section 13).
- 2.4.3 Internal Reporting: If the illegal behaviour involves a person involved with the Member Organization, the internal reporting process outlined in Section 13 also applies in addition to 2.4.2.