

May 7, 2022

To: Carol Purcer, President RCA and Jen Parfitt, Safe Sport Coordinator

From: Janine Chan President and the Kamloops Rowing Club Board of Directors/ Kamloops , British Columbia

Topic: Provisional Adoption of the Safe Sport Policy (SSP)

The Kamloops Rowing Club (KRC) has recently submitted its 2022 membership fees to RCA for the new season. As per the “ Club Implementation: Tasks and Timelines ” document circulated to LSOs for the SSP adoption, the RCA Declaration is tied to the Adoption of the SSP. This clearly defines that RCA liability insurance for a rowing club will only be provided with the “ Adoption of the SSP ”. KRC is submitting this letter to RCA to clarify that we are “ fulfilling our responsibility as a “Member in good standing in 2022 ” through the submitted Annual Fee Payment, upcoming May RCA Declaration and **Provisional Adoption of the SSP** ”.

The KRC has encountered a number of difficulties in the adoption of the SSP suite of policies and procedures which can be reviewed in the email exchange of questions/answers between the KRC, Jen Parfitt (NSO) and Lisa Tschannen (PSO, RBC). The Club has been obliged to **provisionally** adopt them in order to provide our members with rowing opportunities for the current season. Our difficulties and objections with the wholesale adoption of the SSP are as follows and we wish them to go in our record.

The KRC is an independently registered organization under the BC Society’s Act. We are not employees of, subsidiary to, or franchisees of Rowing Canada. Although we appreciate the guidance provided by RCA, we require that the policies and procedures we follow fit our organization’s structure and limitations.

As a small, recreational, primarily masters rowing club, operating with a volunteer Board of Directors and volunteer Certified Coach, our capabilities and capacity are dictated by the size of our resources. Thus, we find the following:

- The SSP language and design imply a clear lack of acknowledgement from our NSO of the challenges we, and we suspect other similar sized Clubs, face who aren’t professionally staffed/coached and have limited resources.
- The KRC has no intention of issuing a series of waivers to cover instances in which we cannot comply with a “one size fits all” SSP. Our policies and procedures will instead state what steps we can realistically perform to safeguard both our membership, and our organization.
- The KRC does not have the capacity to stay on top of legislation and policy changes relating to the SSP. That work should be shouldered by our NSO, the SSP author, to complete and keep LSOs apprised of any changes to SSP policies in this regard.

The KRC agrees with the adoption of the Universal Code of Conduct for the Prevention of Maltreatment in Sport (UCCMS) as mandated by the federal government. The KRC questions whether the RCA has the right to impose its SSP on our rowing club and link its adoption directly to liability insurance coverage that allows us to offer public sport programming. By RCA’s admission, “RCA has gone beyond the federally mandated requirements by seeking to have our policies and procedures adapted within the entire rowing community.” Furthermore, there appears to be no demonstrable or historical need for the

adoption of these policies and procedures by KRC. The current policies employed by KRC are fit for purpose. (With the exception of the UCCMS's new requirement for a third party mediated complaints process.)

Implementation of the SSP involves far more than "inserting our club's name into the spaces provided."

- In SSP meetings held by our PSO, the original February 2022 adoption date set by RCA was evidence of pushing the SSP through the LSO system and a disregard of the impact the SSP introduction would have at the LSO level (time required for reading/understanding/conversations and adoption steps.)
- KRC must ensure the SSP is consistent with its governing documents, and amend them when warranted. For example, the external investigation and disciplining of our members as required by the Safe Sport Policy is contrary to our current Society Bylaws. As a Society, Bylaw changes require thought and time.
- The creation of a "Privacy Officer" and "Independent Screening Committee Individual", titles and duties, exists in the SSP. The KRC currently performs similar activities within its current administrative structure and maintains similar thoroughness in its outcomes. Thus, due to operational constraints, **the KRC will not create 2 additional "SSP defined positions"**, but will continue its current operation in these areas. Thus, a Provisional Adoption of the SSP in these areas will occur.
- The creation of a "Complaints Officer (CO)" has been discussed by Rowing BC with Clubs. The suggestion of having a pool of several COs in the Province that can be utilized as needed by a club has been discussed. **KRC will not have an in-house CO** as we do not have the capacity in membership to fulfill the responsibilities described in the SSP.

The SSP is written in contractual language rendering the policies difficult to comprehend with any clarity. This will lead to errors in implementation thereby increasing the risk of KRC liability. Verbal or written assurances by Rowing Canada as to the interpretation of the SSP are inadequate protection, as RCA has instructed clubs to present this document to their own membership as though individual clubs are the authors. Furthermore, the SSP incorporates legislation, such as the BC Personal Information Protection Act (PIPA) with the statement (Item 1.4 Privacy): "To the extent that provisions in this policy are inconsistent with PIPA, PIPA's requirements and provisions shall govern." As mentioned previously, our club membership does not possess the expertise to interpret legislation. Thus, the KRC will only provisionally adopt the SSP in this area and rely on our PSO, NSO to keep our Club updated.

The Kamloops Rowing Club shares its facilities and clubhouse with the Kamloops Canoe and Kayak Club and the Kamloops Waterski Club. These three clubs potentially have the ability to harmonize their approaches to the UCCMS, and this will require considerable time and effort. We cannot expect these other groups to abide by policies and procedures drafted by Rowing Canada.

As the above demonstrates, the Kamloops Rowing Club has reviewed the language, content and implications of the SSP. We have found this launch of such an important aspect around the safe delivery of our sport disheartening as there is more risk than benefit in many of the areas of the SSP. Thus, the KRC will only provisionally adopt the SSP. A wholesale adoption of SSP is unsuitable for an organization of our size and resources.

Signed,

Janine Chan, President and the Kamloops Rowing Club Board of Directors