# Not-for-Profit Registered Sports League in Ontario

POLICIES AND PROCEDURES MANUAL

Version 1.1

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## **TABLE OF CONTENTS**

Part I: Introduction	10
1.1 Overview of the Organization	10
1.2 Purpose of the Manual	10
Part II: Legal and Compliance	11
2.1 Risk Management Policy	11
2.1.1 Purpose	11
2.1.2 Risk Management Principles	11
2.1.3 Scope and Authority – Risk Manager	12
2.1.4 Policy	12
2.1.5 Risk Tolerance	12
2.1.6 Procedures	13
2.1.7 Risk Mitigation Strategies	15
2.1.8 Risk Control Measures	15
2.1.9 Reporting and Communication	16
	16
2.2 Intellectual Property Policy	16
	16
2.2.2. Obligations	17
2.2.3. Grant of License	17
2.2.4. Enforcement	18
2.3 Data Retention Policy	18
2.3.1 Introduction	18
2.3.2 Objective	18
2.3.3 Scope	18
2.3.4 Data Retention Period	18
2.3.5 Disposal	19
2.3.6 Privacy Rights	19
2.3.7 Changes to the Policy	20
Part III: Governance and Administration	21
3.1 Accessibility Policy	21
3.1.1 Purpose	21
3.1.2 Policy Statements	21

3.1.3 Procedure	22
3.1.4 Feedback Process	22
3.1.5 Modifications to this or other policies	22
3.2 Accountability and Transparency Policy	22
3.2.1 Policy	22
3.2.2 Accountability	22
3.2.3 Transparency	23
3.2.4 Financial Reporting	23
3.2.5 Performance Measurement and Reporting	23
3.2.6 Open Governance	23
3.2.7 Responsibilities	23
3.3 Confidentiality Policy	24
3.3.1 Definitions	24
	24
3.3.3 Responsibilities	24
	25
3.4 Privacy Policy	25
3.4.1 Collection of Personal information	25
3.4.2 Use of Personal Information	25
3.4.3 Disclosure of Personal Information	25
3.4.4 Links	26
3.4.5 Cookies	26
3.4.6 Security	26
3.4.7 Policy Changes	26
3.5 Conflict of Interest Policy	26
3.5.1 Definitions	26
3.5.2 Purpose	27
3.5.3 Scope and Application	27
3.5.4 Statutory Obligations	27
3.5.5 Additional Obligations	27
3.5.6 Disclosure of Conflict	28
3.5.7 Resolving Conflict in Designated Positions	28
3.5.8 Resolving Conflict in Decision - Making	28
3.5.9 Enforcement	28
3.5.10 Documentation and Publication	29

3.5.11 Right to Appeal	29
3.5.12 Review and Approval	29
3.6 Cricket Ontario By-Laws	29
3.6.2 Definitions	29
3.6.3 Registered Office	30
3.6.4 No Gain for Members	30
3.6.5 Ruling on By-laws	30
3.6.6 Affiliations	30
Part IV: Financial Management	31
4.1 Asset Management Policy	31
4.1.1 Objective	31
4.1.2 Scope	31
4.1.4 Management and Maintenance of an Asset Register	31
4.1 Financial Management Governance	32
4.1.1 Objective	
4.1.2 Policy Statement	
4.1.3 Scope	32
4.1.4 Definitions	32
4.1.5 Specific Polices	33
4.1.6 Responsibilities	33
4.1.7 Procedures	33
4.2 Accounting and Financial Reporting	35
4.2.1 Objective	35
4.2.2 Policy Statement	35
4.2.3 Scope	35
4.2.4 Definitions	35
4.2.5 Specific Policies	35
426 Responsibilities	35
4.2.7 Procedures	36
4.3 Internal Controls and Audits	37
4.3.1 Objective	37
4.3.2 Policy Statement	37
4.3.3 Scope	38
4.3.4 Definitions	38
4.3.5 Procedures	38

4.4 Funding and Grants Management	40
4.4.1 Objective	40
4.4.2 Policy Statement	40
4.4.3 Scope	40
4.4.4 Definition	40
4.4.5 Specific Policies	40
4.4.6 Responsibilities	41
4.4.7 Procedures	41
4.5 Expense Reimbursement Policy	42
	42
Part V: Health and Safety	43
5.1 Anti-Bullying Policy	43
5.1.1 Definitions	43
5.1.2 Objectives	
5.1.3 Procedures	
5.1.4 Abuse and Neglect of Minors	44
5.2 Anti-Doping Policy	
5.2.1 Background and Position Statement	
5.2.2 Definitions	44
5.2.3 Application	45
5.2.4 Policy Statement	45
5.2.5 Public Announcement of Results	45
5.2.6 Anti-Doping Education Program	45
5.2.7 Sanctions	45
5.3 Concussion Prevention and Management and Return-to-Play Policy	46
5 3.1 Possible Symptoms (as per Sport Concussion Assessment Tool 2 – SCAT2)	46
5.3.2 Return to Play	47
Part W: Conducts and Ethics	48
6.1 Conduct Policy for Spectators	48
6.1.2 Definition	48
6.1.3 Purpose	48
6.1.4 Actions	48
6.2 Conduct Policy for Board of Directors	49
6.2.1 Definition	49
6.2.3 Purpose	49

6.2.4 Guiding Principles	49
6.2.5 Accountability	49
6.2.6 Professional Excellence	49
6.2.7 Confidentiality	49
6.2.8 Collaboration and Cooperation	49
6.2.9 Support	50
6.2.10 Responsibility	50
6.3 Harassment Policy and Procedures	50
6.3.1 Policy	50
6.3.2 Scope	50
6.3.3 Purpose, Scope, and Application	50
6.3.4 Standard of Behavior	51
6.3.5 Reporting Harassment	51
6.3.6 Formal Complaint Process	51
6.3.7 Procedure for Reviewing Complaints	52
6.3.9 Timelines	
6.3.10 Confidentiality	55
6.4 Inclusion Policy	
6.4.1 Policy Statement	55
6.5 Disciplinary Policy for Players and Team Officials	55
6.5.1 Appeal Process	56
6.5.2 Code of Conduct Levels and Penalties	57
Part VII: Operations and Processes	60
7.1 Dispute Resolution Policy	60
7.1.1 Procedures and Steps to be Followed after Submission of the Complaint	60
7.1.2. Decision	61
7.1.3. Right to Appeal	61
X Selection Policy and Process	61
7.2.1 Team Selection Process	61
7.3. Volunteer Screening Policy	62
7.3.1. Volunteer Canada's Safe Steps Screening Program	62
7.3.2. Duty of Care:	63
7.3.3 Police Records Check (PRC) and Unacceptable Behavior	64
Part VIII: Information and Communication	66
8.1 Social Media Policy	66

	8.1.1. Definitions	66
	8.1.2 Objective	66
	8.1.3 Application	66
	8.1.5 Individual Responsibilities	67
	8.2. Password Policy	67
	8.2.1 Policy Statement	67
	8.2.1 Scope	67
	8.2.2 Reason for Policy	67
	8.2.3 Guiding Principles – Password Protection	68
	8.2.4 The Policy	68
	8.2.4.1 Passwords	68
	8.2.4.2 Password Creation and Use	68
	8.2.4.3 Password Protection	68
	8.3. Information Security Policy	69
	8.3.1 Purpose	69
	8.3.2 Scope	
	8.3.3 Policy	
	8.3.4 Responsibilities	70
	8.3.4.1 All [COMPANY] Staff	
	8.3.4.2 Board of Directors	
Part	IX: Operational Excellence	71
9	.1 Facility Use and Maintenance Policy	
	9.1.1 Grounds and Facilities	
	9.1.1.1 Facilities	71
	9.1.1.2 Ground: Minimum Expected Standards	71
9	.2. Ground Usage Policy	72
	9.2.1 Regulations	72
	9.2.2 Alcohol/Tobacco, Controlled Substances	72
	9.2.3 Indecent Conduct	72
	9.2.4 Obstructing Entrances, Exits, Sidewalks	72
	9.2.5 Destruction of Park Property	72
	9.2.6 Littering, Dumping and Storage	72
	9.2.7 Audio Devices and Noise	72
9	.3. Travel Policy	73
	9.3.1. Purpose	73

	9.3.2 Scope and Application	73
	9.3.3 Key Principles	73
	9.3.4 Expense Claim Procedures	73
	9.3.5 Claim Requirements and Claimant's Responsibilities	74
	9.3.6 Authorization of Claims	74
	9.3.7 Travel	75
9.	4. Accommodations	76
	9.4.1 Hotels	76
	9.5. Technology Use Policy	77
	9.5.1 Scope	77
	9.5.3 Personal Use	77
	9.5.4 Monitoring.	77
	9.5.5 Internet Access	78
9.	.6. Environmental Policy	
	9.6.2 Procedures	78
	X: Community and Engagement	
10	O.1. Community and Engagement	
	10.1.1. Existing Fans and Players	80
	10.1.2. Youth and Long-Term Development	
	10.1.3. Twenty20 Cricket	
	10.1.4. Women and Girls	80
Part	XI: Ethics and Integrity	81
13	1.1 Ethics Policy	81
	11.1.1. Purpose	81
	11.1.2. Scope and Application	81
	11.1.3. Individuals Bound by the Code of Ethics	81
	11.1.4. Obligations	82
Ì	11.1.5. Conflicts of Interest	82
	11.1.6. Declaration of Interests	82
	11.1.7. Confidentiality	
	11.1.8. Bribery, Gifts, and Hospitality	84
	11.1.9. Match-Related Integrity	84
	11.1.10. Relationships with Betting Organizations	84
	11.1.10. General Provisions	85
13	1.2 Whistleblowing Policy	85

	11.2.1 Reasons for Whistleblowing	86
	11.2.2. Factors Inhibiting Whistleblowing	86
	11.2.3. Steps and Procedure for Whistleblowing	86
	11.2.4. Prohibited Actions in Whistleblowing Situations	86
	11.2.5. Assumptions to Avoid in Whistleblowing	87
	11.2.6. Reporting Suspicions	87
	11.2.7. Feedback	
1	1.3 Fair Play Policy	87
	11.3.1. The Spirit of Cricket	

#### Part I: Introduction

#### 1.1 Overview of the Organization

The [COMPANY] was established in 1979 with the goal of Initially, we started with

Ever since its inception, [COMPANY] has maintained cordial relations with the cities of Brampton, Etobicoke, Mississauga, and Toronto. We have worked collaboratively to improve the facilities . This includes educating the parks and recreation departments about

Because of these efforts, there has been a significant improvement in the quality of

#### 1.2 Purpose of the Manual

This manual is designed to outline the structured framework of [COMPANY], highlighting the policies and procedures necessary for effective delivery of services. It is a reference manual for [COMPANY]'s staff to ensure compliance with the requirements of Ontario and demarcate our commitment to providing high-quality compliant, and ethical services to our clients.



### Part II: Legal and Compliance

#### 2.1 Risk Management Policy

[COMPANY] and its members are committed to managing risks by ensuring its decisions and actions reflect established standards and organizational values.

#### 2.1.1 Purpose

The purpose of this policy is to provide a guiding statement on how risks will be managed within [COMPANY] and its members. In general, [COMPANY] and its members view risk management as a comprehensive approach to improving organizational performance.

This policy has other purposes, namely:

- a) Reinforcing an understanding of risk management as having a broad focus, beyond merely preventing lawsuits and financial losses
- b) Performing an educational function for the Board and Members
- c) Over the longer term, contributing to enhancing a 'risk management culture' within the Organization and its Members

Ultimately, successful risk management has the following benefits:

- a) Prevents or limits injury or losses to participants, volunteers, and staff.
- b) Helps to protects the Organization and its Members against unnecessary litigation.
- c) Ensures that the Organization and its Members are compliant with all applicable laws, regulations, and standards
- d) Improves the quality and relevance of the programs and services that the Organization and its Members provide to its members, partners, and sponsors.
- e) Promotes improved business management and human resource management practices.
- f) Enhances the brand, reputation, and image in the community of the Organization.
- g) Overall, enhances the ability for the Organization or a Member to achieve their strategic objective.

#### 2.1.2 Risk Management Principles

The International Standard Organization (ISO 31000:2009E) risk management principles are:

- a) Risk management creates and protects value.
- b) Risk management is an integral part of all organizational processes.

- c) Risk management is part of decision-making.
- d) Risk management explicitly addresses uncertainty.
- e) Risk management is systematic, structured, and timely.
- f) Risk management is based on the best available information.
- g) Risk management is tailored.
- h) Risk management considers human and cultural factors.
- i) Risk management is transparent and inclusive
- i) Risk management is dynamic, iterative, and responsive to change
- k) Risk management facilitates continual improvement of the organization

#### 2.1.3 Scope and Authority – Risk Manager

The President of [COMPANY] as chair of the Risk Management Committee is the designated Risk Manager and is responsible for the implementation, maintenance, and communication of this policy. This policy applies to all decision and activities undertaken on behalf of the Organization or a Member.

#### 2.1.4 Policy

[COMPANY] and its members make the following commitments:

- a) Activities and events undertaken by [COMPANY], and its members will incorporate the principles of risk management.
- b) Systematic and explicit steps will be taken to identify, assess, manage, and communicate risks facing the organization and its members in a timely manner.
- c) Risk mitigation strategies will be reasonable and will reflect the reasonable standard of care in any circumstance (where standard of care is determined by written/published standards, industry practices, established case law precedent, and common sense).

[COMPANY] and its members acknowledge that risk management is a broad activity and a shared responsibility. All Directors, Officers, staff, and volunteers have an ongoing responsibility to take appropriate measures within their scope of authority and responsibility to identify, assess, manage, and communicate risks to those that they report to including but not limited to, the Risk Manager.

#### 2.1.5 Risk Tolerance

The 'significance of a risk' refers to the combined ranking of the possibility/likelihood of a risk occurring and the consequence should it occur.

#### **Possibility**

- a) Unlikely less likely to happen than not; occurs every 5 years
- b) Possible just as likely to happen as not; occurs once every year
- c) Probably more likely to happen than not; occurs once a month
- d) Almost certain sure to happen; occurs once a week

#### **Consequence**

- a) Minor will have an impact on the achievement of the objective that can be dealt with through small internal adjustments.
- b) Moderate will have an impact on some aspect of the achievement of the objective that will require changes to strategy or program delivery that may require a delay or increase in cost
- c) Serious will significantly impact the achievement of the objective and require additional time, resources, costs, and thought.
- d) Catastrophic will have a debilitating impact on the achievement of the objective; staff and board need to devote full time resources to managing the situation.

#### **Commitment**

Risks are identified by Directors and staff on an ongoing basis. All Minor-to-Moderate risks are managed by the Risk Manager and captured within program documents.

Risks that arise and considered to be Serious Catastrophic are treated as follows:

- a) If a **Serious risk** is identified, it must be communicated to the Chair of the Board or senior staff person within 48 hours of the risk being identified. The individual will take all reasonable measures to manage the risk including, but not limited to, seeking the advice from other board members, consulting external experts, etc. Once the individual feels that the risk has been managed or is in the process of being resolved, the Board will be advised using the most appropriate communications, which depending on the nature of the risk, may include an issue document, sharing at the next meeting, or calling a separate Board meeting to keep the Board informed.
- b) If a **Catastrophic risk** has been identified, the Chair of the Board and senior staff person must be contacted immediately. The Chair of the Board and senior staff person will determine the most appropriate action and if appropriate, may organize a Board meeting within 48 hours of the risk arising. It is understood that factors may arise that prevent this from happening including time zone, availability, nature of the risk, etc. All reasonable efforts will be made to manage the risk as it occurs, taking the necessary measures including, not to limited to, seeking the advice from internal partners, other Board members and external experts.

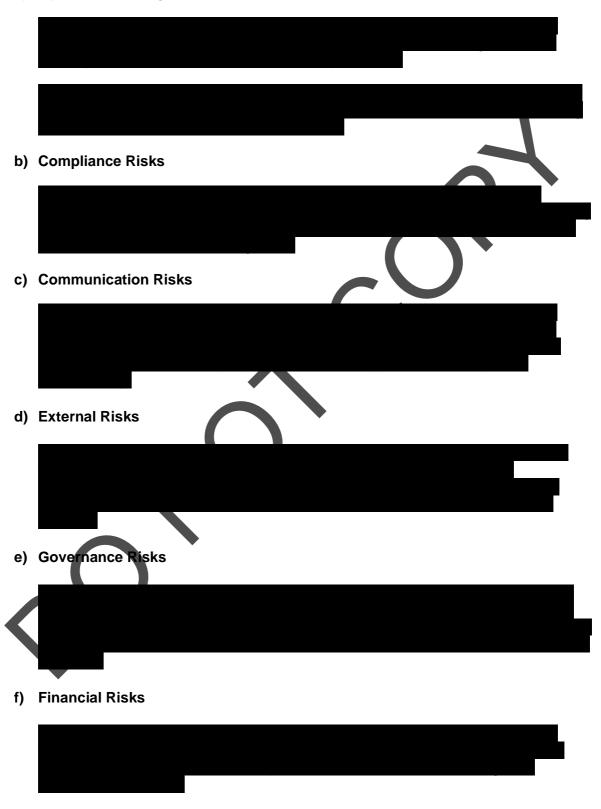
#### 2.1.6 Procedures

Managing risks involves 3 steps:



Risks arise from several categories of the operations of the Organization and its Members. The following categories will be used when identifying risks:

a) Operational / Program Risks



#### g) Health and Safety of Players

#### 2.1.7 Risk Mitigation Strategies

All risks faced by [COMPANY], and its members can be addressed by one or more of the following four general strategies:

- a) **Retain** the risk no action is taken because the possibility and consequence of the risk is low. It may also be that the risk is inherent in the activity itself and thus can be accepted in its present form.
- b) **Reduce** the risk steps are taken to reduce the possibility of the risk and/or its potential consequences, through efforts such as improved planning, policies, delivery, supervision, monitoring, or education.
- c) **Transfer** the risk accept the level of risk but transfer some or all of it to others using insurance, waiver of liability agreements or other business contracts.
- d) **Avoid** the risk eliminate the risk by avoiding the activity giving rise to the risk in other words, simply decide not to do something, or to eliminate some activity or initiative.

#### 2.1.8 Risk Control Measures

The above general strategies translate into a variety of risk control measures, which for the Organization and its Members may include, but are not limited to:

- a) Development of policies, procedures, standards, and rules.
- b) Effective communication.
- c) Education, instruction, professional development, and specialized training.
- d) Ensuring a core set of organizational values have been identified, defined, and communicated throughout [COMPANY].
- e) Adherence to minimum, mandatory qualifications and/or certifications for key staff and leaders.
- f) Use of robust and legally sound contracts (i.e., employment agreements, contractor agreements, partnership agreements).
- g) Improving role clarity through use of written position descriptions and committee terms of reference.
- h) Supervision and monitoring of staff, volunteers, participants, and activities.
- i) Establishing and communicating procedures to handle concerns, complaints, and disputes.

- j) Implementing schedules for regular review, maintenance, repair, and replacement of equipment.
- k) Preparing procedures and protocols for emergency response and crisis management.
- I) Use of warnings, signage, participation agreements and waiver of liability agreements where warranted.
- m) Purchasing appropriate insurance coverage for all activities and reviewing regularly.

#### 2.1.9 Reporting and Communication

To ensure that risk management remains a high priority within [COMPANY] and its Members and to promote an organizational culture that embraces a risk management perspective, risk management will be a standing item on the agenda of every regular Board meeting, so that staff and Directors can provide updates as required.

[COMPANY] and its members recognize that communication is an essential part of risk management. This policy will be communicated to staff, the Board of Directors, Committees and volunteers and the Organization and its Members will encourage all members to communicate their risk management issues and concerns.

#### 2.1.10 Insurance

[COMPANY] and its members maintain a comprehensive insurance program that provides General Liability, Accident and Directors and Officers Errors and Omissions coverage to the directors, officers, staff, members, volunteers and sponsors of the Organization and its Members.

On every review of this policy, [COMPANY] and its Members will consult with the insurance provider to determine if there are any emerging gaps, issues, or deficiencies to be addressed through insurance renewal.

Not all risks are insurable. However, as part of its commitment to risk management, [COMPANY] and its Members will take all reasonable steps to ensure that insurance coverage is available for essential activities.

#### 2.2 Intellectual Property Policy

## 2.2.1. Purpose

[COMPANY]'s image and reputation are of the utmost importance, and it is critical that the [COMPANY] logo, intellectual property, and slogans (collectively "Intellectual Property") are applied consistently and reflect the highest of standards. Therefore:



The purpose of this Policy, in conjunction with [COMPANY]'s Copyright Policy, is to provide Users guiding principles, policies and regulations regarding:
2.2.2. Obligations
Users wishing to use [COMPANY]'s Intellectual Property will adhere to the following:
Users granted use will NOT:
2.2.3. Grant of License
Each potential user will be considered on its own merits. Judgment and discretion will characterize the decision-making process; however, the following set of questions will be considered:

[COMPANY] will grant to approved users, in accordance with the terms set out in this policy and any other applicable agreement, a non-exclusive license to use the [COMPANY] Intellectual Property.

[COMPANY] reserves the right of final approval of all users and the right to refuse or terminate any use of the Intellectual Property at its sole discretion.

#### 2.2.4. Enforcement

Failure to adhere to this Policy may give rise to discipline in accordance with the [COMPANY]'s Discipline and Complaints Policy or remedies sought in a court of competent jurisdiction.

#### 2.3 Data Retention Policy

#### 2.3.1 Introduction

In certain circumstances, it will be necessary for [COMPANY] to retain specific information to fulfil statutory or regulatory requirements and to meet organizational needs. Retention of personal information may also be useful to evidence agreements in the case of disputes, which is in the interests of both the cricket player and [COMPANY].

#### 2.3.2 Objective

The objective of this policy is to set out the length of time that [COMPANY] will retain the categories of personal information processed (i.e. the retention period) and the appropriate process for disposing of personal data at the end of that retention period.

#### 2.3.3 Scope

This policy covers all personal data held by [COMPANY] (

#### 2.3.4 Data Retention Period

[COMPANY] will only retain your personal data for as long as necessary



#### 2.3.5 Disposal

In circumstances where the retention period of a document containing special data has expired, a review should be carried out prior to a decision being made to dispose of it, in accordance with the disposal and retention checklist.

#### 2.3.5.1 Hard Copy Records

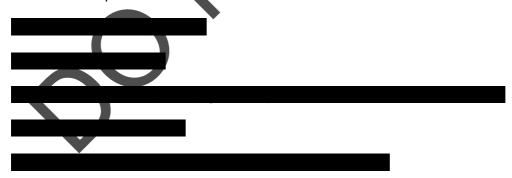
Hard copy records containing personal information should be placed in confidential waste bins/or shredded for collection by an approved disposal firm.

#### 2.3.5.2 Electronic Records

Electronic records containing personal information require disposal (including any back-up or other copies) should be deleted (i.e. wiped).

#### 2.3.5.3 Records of Disposal

Records of disposal should be maintained and should detail:

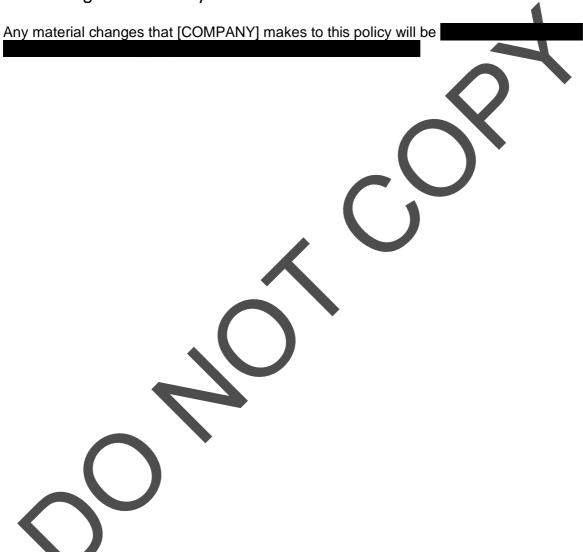


## 2.3.6 Privacy Rights

You have the right to ask [COMPANY] for a copy of your personal data,



## 2.3.7 Changes to the Policy



#### Part III: Governance and Administration

#### 3.1 Accessibility Policy

The ([COMPANY]) is committed to diversity, inclusion, and accessibility for persons with disabilities.

#### 3.1.1 Purpose

The Accessibility Policy outlines [COMPANY]'s strategy of working

#### 3.1.2 Policy Statements

**Assistive Devices** 

[COMPANY] allows persons with disabilities to use assistive devices

#### Communication

[COMPANY] is committed to communicating with persons with disabilities

#### Service Animals and Support Persons

[COMPANY] welcomes service animals and support persons that persons with disabilities trust and rely on.

#### Notice of Temporary Disruption

If there is a planned or unexpected disruption to [COMPANY]'s services,

#### **Training**

[COMPANY] will provide training to all its employees and volunteers

#### 3.1.3 Procedure

To request accommodations or assistance for any program or service, please contact [COMPANY] by phone or email.

#### 3.1.4 Feedback Process

[COMPANY] encourages feedback regarding how it provides programs and services to persons with disabilities. This can be provided via the following methods:

E-mail:

Phone:

#### 3.1.5 Modifications to this or other policies

[COMPANY] is committed to ensuring that its policies, practices, and procedures are consistent with and promote the core principles of dignity, independence integration, and equal opportunity. Any policy that does not respect and promote the dignity and independence of persons with disabilities will be modified or removed.

#### 3.2 Accountability and Transparency Policy

The purpose of this policy is to provide guidance on

#### **3.2.1 Policy**

The governance of [COMPANY] is guided by the following principles:

- All disclosures are made to the executives in an open and transparent manner.
- Financial resources are managed in an efficient, effective, and professional manner.
- Information is accessible to all executives and stakeholders as required.
- Stakeholders, parents, players' inquiries, concerns, and complaints are responded in a timely manner.
- Financial, program and performance reporting are made available and accessible to all stakeholders.
- Every new delegation of power or authority has a corresponding accountability mechanism.

#### 3.2.2 Accountability

[COMPANY] is obligated to demonstrate and take responsibility for

#### 3.2.3 Transparency

[COMPANY] conducts business in a clear and visible manner. Its activities are open to examination by its stakeholders.

#### 3.2.4 Financial Reporting

The following policies and procedures demonstrate [COMPANY]'s best-practices regarding financial accountability, oversight, and financial reporting mechanisms:

## 3.2.5 Performance Measurement and Reporting

[COMPANY] is accountable to its stakeholders and committed to

## 3.2.6 Open Governance

[COMPANY] follows an open governance approach with its stakeholders by

## 3.2.7 Responsibilities

[COMPANY]'s board members are responsible for

#### 3.3 Confidentiality Policy

#### 3.3.1 Definitions

These terms will be important to know for understanding the confidentiality policy:

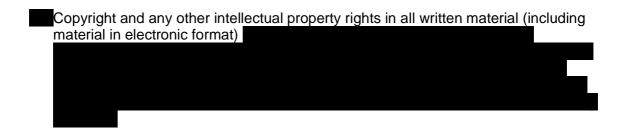
- (a) **Individuals:** All [COMPANY] members and all employed personnel (including contractors), including but not limited to directors, players, coaches, officials, umpires, volunteers, officers, managers, and administrators.
- (b) Confidential Information: The term includes, but is not limited to the following:
- Personal Information of [COMPANY] participants, members, and individuals, including but not limited to name, address, e-mail, telephone number, cell phone number, date of birth, financial information, medical history, etc.
- [COMPANY]'s intellectual property and proprietary information related to the cricket matches, programs, fundraisers, business, or affairs of [COMPANY] and

#### 3.3.2 Purpose

The purpose of this policy is to ensure the protection of confidential information that is proprietary to [COMPANY] by making all individuals aware that there is an expectation to always act with this policy.

### 3.3.3 Responsibilities

- (a) Individuals will not either during the period of their involvement/employment or thereafter, disclose to any person or organization any Confidential Information acquired during their period of involvement/employment with [COMPANY], unless authorized to do so.
- (b) Individuals will not
  - All files and written materials containing Confidential Information will remain the property of [COMPANY]
  - Individuals voluntarily publishing or



#### 3.3.4 Enforcement

A breach of any provision in this policy may give rise to discipline in accordance with [COMPANY]'s disciplinary policy.

#### 3.4 Privacy Policy

Privacy of information is extremely important to [COMPANY]. This privacy policy is intended to give stakeholders confidence in the privacy and security of

### 3.4.1 Collection of Personal information

When you visit [COMPANY]'s website, you may be asked for

## 3.4.2 Use of Personal Information

We may use your personal information to

#### 3.4.3 Disclosure of Personal Information

We may provide information about you

#### 3.4.4 Links

[COMPANY] website contains links to other sites. Please note that [COMPANY] is not responsible for the privacy practices of third-party websites.

#### 3.4.5 Cookies

Cookies are small data files that a website you visit may save on your computer or handheld device. The cookies usually contain an anonymous unique identifier. The [COMPANY] website may



#### 3.4.6 Security

The security of information collected through any form available on the [COMPANY] website and/or paper is treated seriously.

## 3.4.7 Policy Changes

Changes in this policy will be posted on our website. You are advised to check our website regularly to view our most recent privacy policy.

## 3.5 Conflict of Interest Policy

#### 3.5.1 Definitions

There terms will be important to know for understanding the conflict-of-interest policy:

- (a) Conflict of Interest: Any situation in which an individual or the organization they represent in any capacity is influenced or could be influenced by personal, family, financial, business, or other interests which override the best interests of [COMPANY].
- **(b) Pecuniary Interest:** An interest that an individual may have in a matter because of the reasonable likelihood or expectation of financial gain or loss for that individual, or another person with whom that individual is associated.

- **(c) Non-Pecuniary Interest:** An interest that an individual may have in a matter which may involve family relationships, friendships, volunteer positions or other interests that do not involve the potential for financial gain or loss.
- **(d) Individual:** All decision makers within [COMPANY], including the executives, officers, board of directors, and other individuals who hold authority within [COMPANY].
- **(e) Person:** Any individual, cricket player, staff, parents, family member or friend of the cricket player, customer, client, sponsor, colleague, legal person, or organization.

#### 3.5.2 Purpose

The purpose of this policy is to provide a standard of behavior that prevents exploitation of conflict-of-interest situations.

#### 3.5.3 Scope and Application

This policy applies to all members as defined in the Definitions section.

#### 3.5.4 Statutory Obligations

[COMPANY] is incorporated under the Canada Corporations Act and is governed by the Act in matters

## 3.5.5 Additional Obligations

In addition to fulfilling all requirements of the Act, individuals will also fulfill the additional requirements of this policy. Individuals will not:





#### 3.5.6 Disclosure of Conflict

All individuals will disclose any conflict-of-interest situation in the following manner:

### 3.5.7 Resolving Conflict in Designated Positions

Following disclosure of conflict of interest which could affect the carrying out of the duties of the individual, or where the personal interest is sufficient to appear to influence the exercise of his or her official duties,

## 3.5.8 Resolving Conflict in Decision - Making

Following disclosure of a conflict of interest with respect to a particular decision, the following principles shall apply:

### 3.5.9 Enforcement

Where an individual has failed to disclose a conflict of interest, the Board of Directors will take the following actions:



(c) Individuals who fail to meet the standards of behavior contained within this policy will be subject to disciplinary sanctions as identified within [COMPANY]'s Discipline and Complaints Policy.

#### 3.5.10 Documentation and Publication

Documentation relating to conflict-of-interest situations shall be recorded in

#### 3.5.11 Right to Appeal

If the Individual is removed from his/her position and wishes to appeal the decision, a written request for appeal must be submitted to the [COMPANY].

#### 3.5.12 Review and Approval

This policy was approved by [COMPANY]'s Board of Directors

#### 3.6 Cricket Ontario By-Laws

#### 3.6.1 Purpose

These by-laws relate to the general conduct of the affairs of [COMPANY].

#### 3.6.2 Definitions

There terms will be important to know for understanding the Cricket Ontario By-laws:

- (a) Act the Ontario Corporations Act or any successor legislation including the Not-for-Profit Corporations Act, 2010 (upon becoming law).
- (b) Additor—an individual, partnership, or corporation appointed by the Members at the Annual Meeting to audit the books, accounts, and records of the Corporation for a report to the Members at the next Annual Meeting in accordance with the Act.
- (c) Board the Board of Directors of the Corporation.
- (d) Corporation Cricket Ontario.
- (e) Days days including weekends and holidays.
- (f) Director an individual elected or appointed to serve on the Board pursuant to these Bylaws.
- (g) Officer an individual elected or appointed to serve as an Officer of the Corporation pursuant to these By-laws.
- (h) Ordinary Resolution a resolution passed by a majority of the votes cast on that resolution.
- (i) Special Resolution a resolution passed by the Directors and confirmed with or without variation by at least two-thirds of the votes cast at a general meeting of the voting

- members of the Corporation duly called for that purpose, or in lieu of such confirmation, by the consent in writing of all the voting members entitled to vote at such meeting.
- (j) Team any affiliated team playing in a cricket competition format that is organized, advertised, and fielded / scheduled in a dedicated competition to support the specific format. All participating teams constituting that level of competition are designated as 'teams' for the given member for all references to a 'Team.'

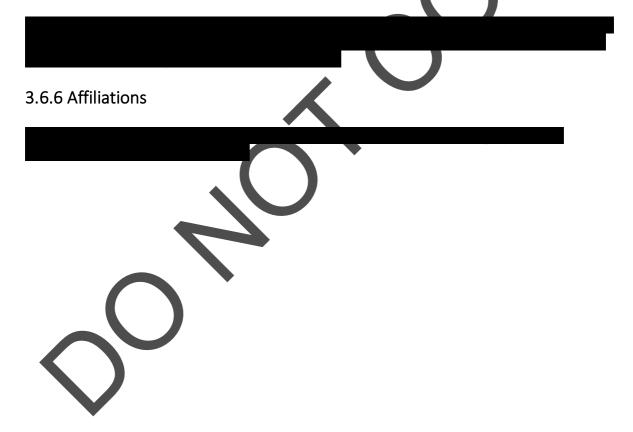
#### 3.6.3 Registered Office

The registered office of the Corporation will be located within the Province of Ontario.

#### 3.6.4 No Gain for Members

The Corporation will be carried on without the purpose of gain for its members and any profits or other accretions to the Corporation will be used for the advancement of [COMPANY]'s mission and goals.

#### 3.6.5 Ruling on By-laws



## Part IV: Financial Management

#### 4.1 Asset Management Policy

#### 4.1.1 Objective

To create an operation and maintenance plan which establishes standards for the level of use, condition, maintenance and performance of assets. The plans also document the resources required to operate and maintain assets.

#### 4.1.2 Scope

This policy covers all financial activities within [COMPANY] which include the following:

### 4.1.3 Performance Requirements, Condition Recording, and Reporting

When you review an asset, you should remember that it exists to serve a specific purpose. Asset performance should directly relate to

Recording the assessments will help with forecasting and benchmarking maintenance expenditure.

## 4.1.4 Management and Maintenance of an Asset Register

[COMPANY] will develop and maintain an accurate asset register to:



It is important that the information is calculated as it relates to asset life and depreciation rates.

#### 4.1.5 Creating, Storing and Communicating Asset Information

Information on asset management should be recorded and stored

#### 4.2 Financial Management Governance

#### 4.2.1 Objective

To create a comprehensive framework for budgeting, planning, and monitoring financial activities

#### 4.2.2 Policy Statement

[COMPANY] is committed to maintaining a strong financial management system that includes

#### 4.2.3 Scope

This policy covers all financial activities within [COMPANY] which includes

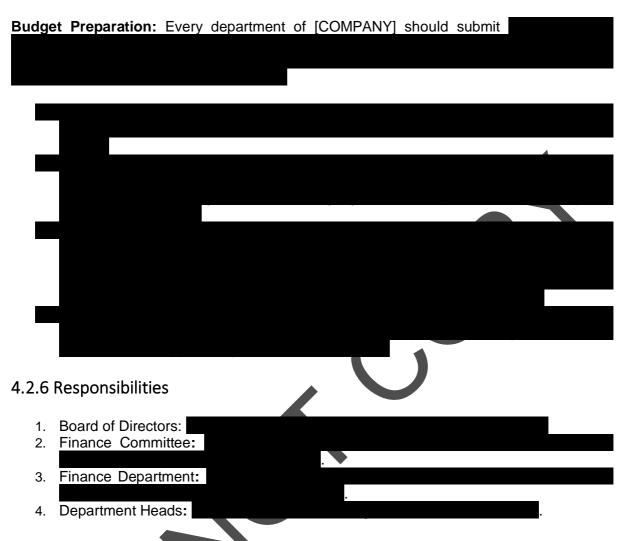
#### 4.2.4 Definitions

**Budgeting:** The process of creating a plan to spend a specified number of resources over a set period, typically a fiscal year.

**Financial Planning:** An ongoing process of strategic planning that allocates future financial resources to meet an organization's goals.

**Monitoring:** Periodic examination of finances so as to ensure they conform to both budget-planned allocations and organizational objectives.

## 4.2.5 Specific Polices



### 4.2.7 Procedures

## 4.2.7.1 Budget Preparation and Approval Process

1. Initiation:	
2. Departmental Submissions:	
3. Compilation and Review:	



## 4.2.7.2 Monitoring and Reporting



## 4.2.7.3 Budget Revision Process



## 4.2.7.4 Annual Review and Audit



#### 4.3 Accounting and Financial Reporting

#### 4.3.1 Objective

To establish a systematic and standardized approach to accounting and financial reporting and comply with relevant Ontario state provisions. The framework is meant to enable informed financial decision-making, ensuring responsibility, and achieving the organization's vision.

#### 4.3.2 Policy Statement

[COMPANY] pledges to maintain a high standard of financial integrity through

#### 4.3.3 Scope

All the transactions associated with finance management within [COMPANY]'s accounting principles as well as any report on finances made should be governed by this policy.

#### 4.3.4 Definitions

- Financial Transactions: Any exchange or transfer of money or other assets.
- Accounting Practices: The systematic process of recording, analyzing, summarizing, and reporting financial transactions.
- Financial Reporting: The process of producing statements that disclose an organization's financial status to management, stakeholders, and the public.

#### 4.3.5 Specific Policies

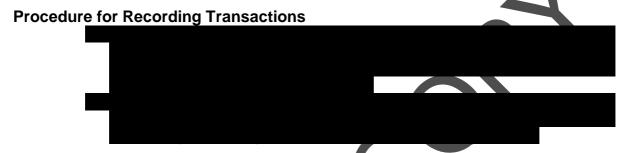


#### 4.3.6 Responsibilities



4.3.7 Procedures

4.3.7.1 Systematic Recording of Financial Transactions



**Daily Transaction Entry** 



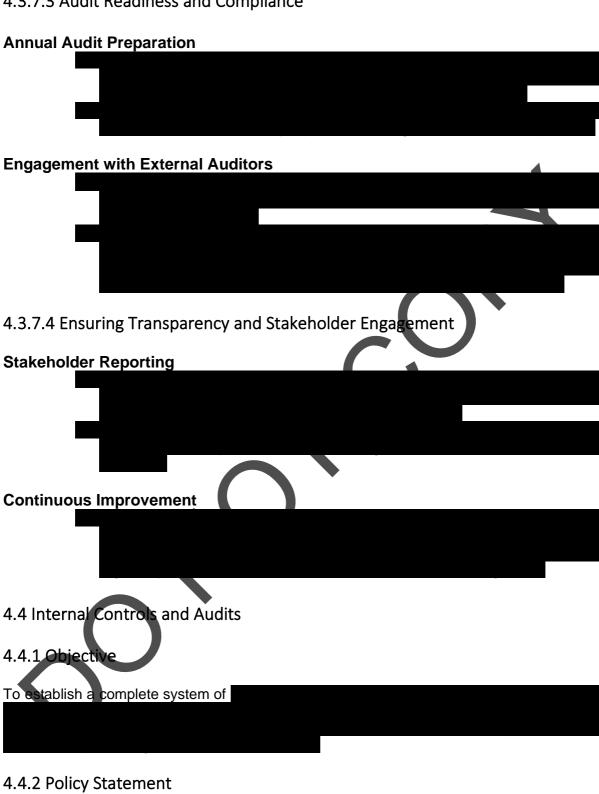
4.3.7.2 Preparation and Review of Financial Statements

**Quarterly Financial Statement Preparation:** 





#### 4.3.7.3 Audit Readiness and Compliance



[COMPANY] is committed to maintaining a stringent internal control environment

#### 4.4.3 Scope

This policy applies to all financial transactions, processes, and reporting within the organization.

#### 4.4.4 Definitions

- 1. **Internal Controls**: Processes designed to provide reasonable assurance regarding the achievement of effective and efficient operations, reliable financial reporting, and compliance with applicable laws and regulations.
- 2. **Audit**: A systematic examination and verification of an organization's financial and operational activities by an independent party.

#### 4.4.5 Procedures

#### 4.4.5.1 Implementation of Internal Controls

#### **Procedure Creation and Documentation**



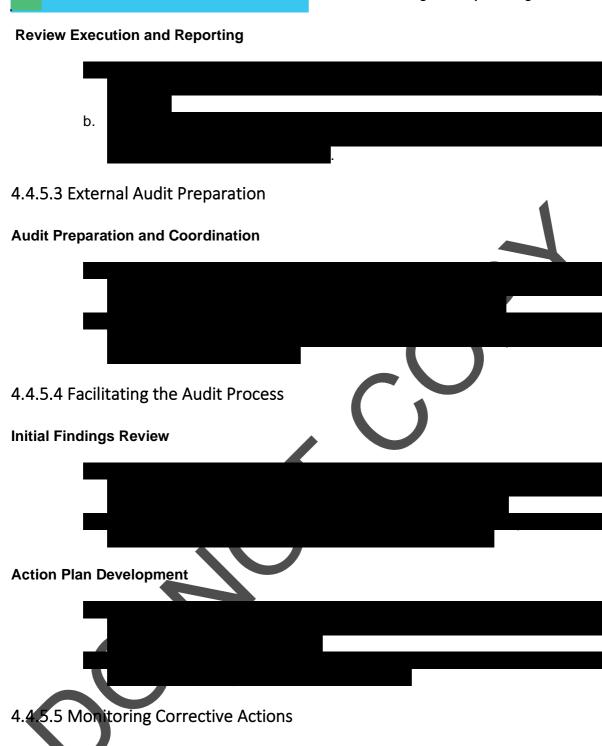
## Staff Training and Competency Development



## 4.4.5.2 Conducting Internal Reviews

#### **Quarterly Internal Control Review Schedule**





b.

Implementation and Monitoring

#### Follow-up Review

b.

#### 4.5 Funding and Grants Management

#### 4.5.1 Objective

The objective of this policy is to ensure that [COMPANY] secures, manages, and utilizes funds and grants in a manner that is efficient, transparent, accountable, and in compliance with both state and federal regulations, as well as specific donor requirements.

#### 4.5.2 Policy Statement

[COMPANY] is committed to maintaining the highest standards of integrity and professionalism

#### 4.5.3 Scope

This policy applies to funding and grants from [COMPANY] obtained from federal government, state governments, or private sources hence covering all aspects of the funding lifecycle, from identification/application through to reporting/compliance.

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