



Policy Name: Independent Third Party		Date of Approval: Oct 1, 2025	Effective Date: Oct 1, 2025
Approved by: Board of Directors	Prepared by: Risk & Safety Committee		Replaces Previous Versions: New Policy
Review Cycle: Biennial			
Responsible: Board of Directors- Risk & Safety	Accountable: Board of Directors	Consulted: Board of Directors	Informed: HNO Members

Purpose

1. The purpose of Hockey Northwestern Ontario's Independent Third-Party Policy (the "ITP Policy") is to ensure that all maltreatment complaint processes in operation in Hockey Northwestern Ontario are aligned with Hockey Canada's Maltreatment Complaint Management Policy.

HOCKEY CANADA'S MALTREATMENT COMPLAINT MANAGEMENT POLICY

2. Hockey Canada has developed its Maltreatment Complaint Management Policy to provide a fully independent and procedurally fair manner to handle Complaints which remain under its jurisdiction even as it becomes a signatory to the Office of the Sport Integrity Commissioner.
3. Hockey Canada has engaged an Independent Third-Party ("ITP") to oversee its complaint mechanism. The ITP will be responsible for the administration of all Complaints, which will include accepting and screening Complaints, determining jurisdiction over the Complaints, determining the procedure that will be followed with respect to each Complaint, and selecting the adjudicator(s) who will be responsible for assessing whether a violation has occurred and what the appropriate discipline should be, if any.
4. In addition to handling national-level Complaints under Hockey Canada's direct jurisdiction (i.e. Complaints involving Organizational Participants), the ITP has also been given the discretion to, where it sees fit, handle Complaints against Member Participants. The following are examples of situations where the ITP may assume jurisdiction over a Member Complaint:
 - a. Where the ITP determines that a Complaint features allegations of Serious Misconduct against a Member Participant;
 - b. Where, in the estimation of the ITP, a conflict of interest might exist, or be perceived to exist, if the matter was handled by the Member; or
 - c. Where the Complaint features Parties from more than one Member and the Members involved cannot agree as to who should take jurisdiction over the matter.
5. Notwithstanding the discretion granted to the ITP in the Maltreatment Complaint Management Policy to determine what constitutes Serious Misconduct, all Member Complaints which primarily advance allegations of: i) Sexual Maltreatment; ii) Grooming; or iii) any conduct which constitutes child abuse under relevant child protection legislation; will constitute Serious Misconduct and the ITP will assume jurisdiction over those Member Complaints

IMPACT ON MEMBER PARTICIPANTS

6. All Member Participants acknowledge that all Complaints will be submitted to the ITP in accordance with Hockey Canada's and Hockey Northwestern Ontario's direction (unless a separate process is mandated by the provincial funder of Hockey Northwestern Ontario). A link to make a direct complaint to the ITP will be displayed prominently on the home page of Hockey Northwestern Ontario's website.
7. Complaints made directly to Hockey Northwestern Ontario, any hockey association under its jurisdiction, or to any Member Participant will be immediately referred to the ITP for handling. However, Hockey Northwestern Ontario may, where it sees fit to ensure the safety of Member Participants, issue an interim suspension to the subject of a Complaint prior to referring the matter to the ITP. Hockey Northwestern Ontario acknowledges that such interim suspension must be reported to the ITP and is subject to review by the ITP.
8. If the ITP does assume jurisdiction over a Complaint against a Member Participant, the Complaint will be handled pursuant to Hockey Canada's Maltreatment Complaint Management Policy. The ultimate discipline resulting from that Complaint, if any, will be administered by the adjudicator(s) selected by the ITP. By participating in Hockey Northwestern Ontario-sanctioned programming, all Member Participants acknowledge and agree that they are bound by the ITP process for Complaints made by or against them.
9. If the ITP does not assume jurisdiction over the Complaint, the matter will be returned to Hockey Northwestern Ontario to be handled in accordance with its usual policies and procedures.
10. In effect, therefore, the ITP will sit "on top" of Hockey Northwestern Ontario's existing maltreatment complaint management procedures as set out in the Existing Policies; Discipline and Complaint Policy, Complaint Intake Form, Maltreatment Policy, Abuse, Harassment and Bullying Policy, and the Risk Management Policy. Where a matter is returned to Hockey Northwestern Ontario by the ITP, the process as set out in the Existing Policies will continue to be followed.

APPENDIX I: DEFINITIONS

- a) **Complaint:** An allegation submitted to Hockey Canada, a Member or the ITP that an Organizational Participant or a Member Participant, as the case may be, has engaged in behaviour that constitutes Maltreatment including, without limitation, Maltreatment-related behaviour arising out of an alleged violation of a policy or code of conduct by which that Organizational Participant or Member Participant is bound.
- b) **Grooming:** Deliberate conduct comprised of one or several acts that, viewed objectively, either make it easier to engage in Sexual Maltreatment or reduce the chance that Sexual Maltreatment will be reported.
- c) **ITP:** Hockey Canada's independent third-party, which is responsible for the management of all Complaints.
- d) **Maltreatment:** A volitional act and/or omission that results in harm or has the potential for physical or psychological harm, and includes psychological maltreatment, physical maltreatment, neglect, and sexual maltreatment as those terms are defined in the UCCMS and/or this ITP Policy.
- e) **Member Participant:** All categories of individual members and/or registrants of Hockey Northwestern Ontario (which include, but are not limited to, players, coaches, officials, team managers, administrators, instructors, employees, committee members, and board members) who are subject to the policies or codes of conduct of Hockey Northwestern Ontario.

- f) **Organizational Participant:** All categories of persons affiliated with Hockey Canada (which include, but are not limited to, players, coaches, officials, team managers, administrators, instructors, employees, contractors, volunteers, committee members, and board members) who are subject to the policies or codes of conduct of Hockey Canada.
- g) **Serious Misconduct:** An allegation of misconduct which the ITP determines, in its absolute discretion, would constitute a significant or flagrant violation of a Hockey Canada or Member policy or code of conduct.
- h) **Sexual Maltreatment:** Any pattern or a single incident, whether physical or psychological in nature, that is committed, threatened, or attempted, and that has the potential to be harmful to a person's sexual integrity.
- i) **“UCCMS”:** the Universal Code of Conduct to Prevent and Address Maltreatment in Sport, as amended from time to time.