Title: Inclusion Policy
Revised: March 9, 2026
Signed & Approved by:

Kevin McLaughlin, Owner & Executive Director

This policy can be made available in an accessible format upon request.

Objective

Hockey Opportunity Camp is committed to providing equal opportunities, access, and benefits of Hockey Opportunity Camp programs to all employees and guests, regardless of faith, race or cultural traditions, gender, gender identity, sexual orientation, colour, or physical ability.

Applicability

This policy applies to all employees and guests of Hockey Opportunity Camp.

Definitions

- **Gender identity** is each person's internal and individual experience of gender. It is their sense of being a woman, a man, both, neither, or anywhere along the gender spectrum. A person's gender identity may be the same as or different from their birth-assigned sex. Gender identity is fundamentally different from a person's sexual orientation.

- **Gender expression** is how a person publicly presents their gender. This can include behaviour and outward appearance such as dress, hair, make-up, body language and voice. A person's chosen name and pronouns are also common ways of expressing gender.

- **Trans** or **transgender** is an umbrella term referring to people with diverse gender identities and expressions that differ from stereotypical gender norms. It includes but is not limited to people who identify as transgender, trans woman

(male-to-female), trans man (female-to-male), transsexual, cross-dresser, gender non-conforming, gender variant or gender queer.

- **Discrimination** happens when a person experiences negative treatment or impact, intentional or not, because of their gender identity or gender expression. It can be direct and obvious or subtle and hidden, but harmful just the same. It can also happen on a higher systemic level, such as organizational rules or policies that look neutral but end up excluding trans people. Friends, family or others who face discrimination because of their association with a trans person are also protected.

- **Harassment** is a form of discrimination. It can include sexually explicit or other inappropriate comments, questions, jokes, name-calling, images, email and social media, transphobic, homophobic or other bullying, sexual advances, touching and other unwelcome and ongoing behaviour that insults, demeans, harms or threatens a person in some way. Assault or other violent behaviour is also a criminal matter. Trans people and other persons can experience harassing behaviour because of their gender identity or expression (gender-based harassment) and/or their sex (sexual harassment).

- **Disability-** Section 10 (1) of the Code defines “disability” as follows: “because of disability” means for the reason that the person has or has had, or is believed to have or have had,
    a) any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical coordination, blindness or visual impairment, deafness or hearing impairment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device,
    b) a condition of mental impairment or a developmental disability,
    c) a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
    d) a mental disorder, or

e) an injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997

- **Undue Hardship-** is an accommodating action that places significant difficulty or expense on the employer. The *Code* prescribes three considerations in assessing whether an accommodation would cause undue hardship. These are:
  a) Cost.
  b) Outside sources of funding, if any.
  c) Health & Safety Requirements, if any.

- **Accommodation**- not denying employees or guests jobs or services in the first place, if they can be accommodated to the point of undue hardship.

Policies

Promoting Inclusion Regardless of Gender Identity or Gender Expression

1) No employee or guest of Hockey Opportunity Camp shall face discrimination or harassment regarding their gender identity or gender expression.
2) Hockey Opportunity Camp employment, accommodation, services, facilities, and related requirements are designed inclusively up front to minimize the need for individual accommodation but can be adapted when people have accommodation needs related to their gender identity or expression. This will be done in a way that best promotes the person's integration and full participation in our camp programming.
3) The person seeking accommodation is responsible for:
   a) Informing Hockey Opportunity Camp when they have Code-related needs that require accommodation.
   b) Providing information relevant to their needs and meeting any agreed-upon standards once accommodation has been provided.
   c) Cooperating in the accommodation process to the best of their ability.
4) Hockey Opportunity Camp is responsible for:
   a) Accepting requests for accommodation in good faith (unless there is evidence that the request is not genuine).

b) Making reasonable requests for only the information that is necessary to clarify the nature and extent of the accommodation needed for the situation.
c) Making sure that information related to accommodation is kept confidential and shared only with people who need the information for their role in implementing the accommodation.
d) Acting in a timely way and taking an active role in looking for solutions.
e) Covering any appropriate costs related to the accommodation.
f) Keeping information about the individual's trans identity private and confidential.

5) All employees and guests of Hockey Opportunity Camp have access to private changing rooms, should they feel uncomfortable with common changing quarters.
6) All employees and guests of Hockey Opportunity Camp have access to private showers.
7) All employees and guests will be treated and welcomed as the gender they choose to identify with, and will share accommodations and washroom facilities with their identified gender, unless this causes undue hardship. Hockey Opportunity Camp will accommodate all reasonable requests in this regard.
8) All employees and guests will follow the Hockey Opportunity Camp dress code.
9) Where barriers for transgender employees and guests continue to exist because it is not possible to remove them at a given point in time, then accommodations will be provided, unless this creates undue hardship.
10) Advance notice greatly improves our ability to ensure we can provide the best possible service to our employees and guests.

Promoting Inclusion Regardless of Sexual Orientation

1) No employee or guest of Hockey Opportunity Camp shall face discrimination or harassment regarding their sexual orientation.
2) All staff applicants and employees of Hockey Opportunity Camp will be given fair and equal treatment and opportunities regardless of their sexual orientation.
3) Any complaints made in regard to the harassment or discrimination of an employee or guest due to their sexual orientation will be attended to in an appropriate and timely fashion. The person who made the complaint will be made aware of the action taken regarding their complaint.

4) Hockey Opportunity Camp will make accommodations upon request, unless it creates undue hardship.

Promoting Inclusion Regardless of Faith, Race and/or Cultural Traditions

1) No employee or guest of Hockey Opportunity Camp shall face discrimination or harassment regarding their faith, race, and/or cultural traditions.
2) We endorse the following anti-racism principles:
    a) We recognize that racism exists in Canadian society and in its institutions, and therefore affects Hockey Opportunity Camp itself.
    b) We recognize our role in combating racism in Hockey Opportunity Camp itself.
    c) We assert our commitment to implement specific measures to combat racism and to engage in actions to eliminate it.
    d) We recognize and value the racial diversity of Ontario and of our own workplace.
    e) We strive for equality of results in our employment practices and delivery of services.
    f) We recognize and respect the unique identities of Aboriginal peoples and the need for a distinct approach to anti-racism measures for Aboriginal peoples.
3) Therefore, we will:
    a) Actively identify and challenge individual or systemic acts of racial discrimination in our workplace and service delivery.
    b) Ensure that management and all employees are responsible for challenging racial discrimination in our workplace and service delivery.
    c) Equip management and all employees with knowledge and skills to recognize and challenge racial discrimination in our workplace and service delivery.
    d) Foster respect daily amongst management and all employees. Ensure that any employee's or client's report of discriminatory treatment will be investigated, and the employee or client will be protected against reprisals.

e) Ensure that management staff understand their legal responsibilities as "directing minds" to act immediately to deal with situations of potential harassment or discrimination.
f) Continually monitor and assess progress in challenging racial discrimination in our workplace and service delivery.

4) Hockey Opportunity Camp will accommodate specific religious requests, on an individual basis, in cases that are deemed realistic, reasonable, and do not create undue hardship.

Promoting Inclusion Regardless of Physical Disability

1) No employee or guest of Hockey Opportunity Camp shall face discrimination or harassment regarding a physical disability.
2) Hockey Opportunity Camp employment, accommodation, services, facilities, and related requirements are designed to minimize the need for individual accommodation, but can be adapted when people have accommodation needs related to a physical disability. This will be done in a way that best promotes the person's integration and full participation in our camp programming.
3) The person with a *disability* is required to:
   a) Advise Hockey Opportunity Camp of the disability (although we do not generally have the right to know what the disability is).
   b) Make his or her needs known to the best of his or her ability, preferably in writing, so that the person responsible for accommodation may make the requested accommodation.
   c) Answer questions or provide information regarding relevant restrictions or limitations, including information from health care professionals, where appropriate and as needed.
   d) Participate in discussions regarding possible accommodation solutions and cooperate with any experts whose assistance is required to manage the accommodation process or when information is required that is unavailable to the person with a disability.
   e) Meet agreed-upon performance and job standards once accommodation is provided.
   f) Work with Hockey Opportunity Camp on an ongoing basis to manage the accommodation process.

g) Discuss his or her disability only with persons who need to know. This may include the Directing Team, Health Care Team, and/or various other HOC Staff Members.

4) Hockey Opportunity Camp is responsible for:
   a) Accept the employee/guest's request for accommodation in good faith, unless there are legitimate reasons for acting otherwise.
   b) Obtain expert opinion or advice where needed.
   c) Take an active role in ensuring that alternative approaches and possible accommodation solutions are investigated and canvass various forms of possible accommodation and alternative solutions, as part of the duty to accommodate.
   d) Keep a record of the accommodation request and action taken.
   e) Maintain confidentiality.
   f) Limit requests for information to those reasonably related to the nature of the limitation or restriction to be able to respond to the accommodation request.
   g) Grant accommodation requests promptly, to the point of undue hardship, even when the request for accommodation does not use any specific formal language.
   h) Bear the cost of any required medical information or documentation. For example, doctors' notes and letters set out accommodation needs.
   i) For additional information, please see our Accommodation Process Policy.