

# **THORNHILL BASEBALL CLUB**

## **POLICY MANUAL TO PROMOTE POSITIVE**

### **BASEBALL BEHAVIOUR**

#### **The Mission of the Club is:**

1. To create supportive and positive experiences for the purpose of building confidence;
2. To provide players with an opportunity to play baseball and have fun within a context of developing and/or improving skills, team play, sportsmanship and competition;
3. To promote positive behaviour and leadership qualities that reflect the norms of societal values; and
4. To respect the dignity of all people – players, coaches, umpires, parents, and members of the Executive of the Club.

#### **The purpose of the Club shall be:**

1. To develop the fundamentals of baseball;
2. To provide for all duly registered players an opportunity to participate in the activities of the Club regardless of ability, race, religion, creed, sex, sexual orientation, or gender identity and
3. To promote good sportsmanship and local community spirit.

For More Information:

#### **Thornhill Baseball Club**

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## **THORNHILL BASEBALL CLUB CODE OF CONDUCT**

1. The Thornhill Baseball Club ("TBC") is committed to providing a sport environment in which all individuals are treated with respect.
2. During the course of all TBC activities, athletes, coaches, assistant coaches, trainers, managers, officials, parents, directors, officers, volunteers, employees or chaperones and others within the TBC:
  - a) shall conduct themselves, at all times, in a fair and responsible manner and refrain from comments or behaviours that are disrespectful, offensive, abusive, racist, homophobic or sexist. In particular, the TBC will not tolerate behaviour that constitutes harassment or abuse or bullying;
  - b) shall avoid behaviour which brings the TBC or the sport of baseball into disrepute, including but not limited to the abusive use of alcohol and/or non-medical use of drugs;
  - c) shall not use unlawful performance enhancing drugs or methods, nor shall they engage in any activity or behaviour that endangers the safety of others; and
  - d) shall at all times adhere to the Baseball Canada ("BC"), TBC and its operational policies and procedures, to rules governing Baseball Canada, Ontario Baseball Association, York Simcoe Baseball Association, TBC events and activities and to rules governing any competition in which they participate.
3. Failure to comply with this Code of Conduct may result in disciplinary action, including, but not limited to, the loss or suspension of certain or all privileges connected with TBC activities. Such discipline may include the removal or ban of the perpetrator from any park, games, practices, and other team activities.

### **GENERAL PROVISIONS**

Conduct within the spirit of this Code of Conduct is expected of players, assistant coaches, coaches, managers, umpires, and parents/spectators.

The dignity and spirit of all people - players, parents, assistant coaches, coaches, convenors, managers, umpires, and Club officials - is to be respected at all times.

All those participating in the activities of the Club are to be treated fairly and equitably.

Behaviour that frightens, embarrasses, demoralizes or negatively affects the self-esteem of anyone participating in the Club's activities will not be tolerated.

A supportive, positive experience for the purposes of building confidence, developing, or improving skills and having fun is expected.

All members will promote positive behaviours that encourage participants and reduce the likelihood of disrespect and violence in our activities.

Abusive or disrespectful language or actions by anyone will not be tolerated including emails, voice messages, text messages and social network postings

Public property and the property of others and the Club will be respected.

Failure to abide by any of the provisions herein may result in offenders being ejected from a game or being asked to leave the park and/or being called before a Discipline Committee appointed by the board.

### **CODE FOR COACHES**

I will be reasonable when scheduling games and practices, remembering that young athletes have other interests and obligations.

I will teach my athletes to play fairly and to respect the rules, officials and opponents and encourage them to be good sports.

I will remind my athletes that winning a game, or a trophy isn't the only measure of success.

I will ensure that ALL athletes get equal instruction, support and playing time.

I will not ridicule or yell at my athletes for making mistakes or for performing poorly. I will encourage my athletes, offer constructive criticism, and maintain a positive attitude. I will remember that athletes play to have fun and must be encouraged to have confidence in themselves.

I will make sure that equipment and facilities are safe and match the athlete's ages and abilities.

I will remember that children need a coach they can respect.

I will remember to set a good example as actions speak louder than words. I will maintain a positive attitude and I will be generous with praise and set a good example.

I will not use bad language, nor will I harass or heckle athletes, coaches, umpires, other spectators, or Club officials by way of emails, voice messages, text messages (including "tweeting") and social network postings.

I will obtain proper training and continue to upgrade my coaching skills.

I will respect and comply with the umpires' decisions and decisions of the Discipline Committee.

### **CODE FOR PLAYERS**

I will participate because I want to, not because my parents or coaches want me to. I will play fairly and by the rules and in the spirit of the game and I will respect my opponents.

I will control my temper and NEVER argue with an umpire – "mouthing off" and fighting can spoil the activity for everybody. When a call is disputed, I will let the coach handle it.

I will not use bad language, nor will I harass athletes, coaches, umpires, other spectators, or Club officials by way of emails, voice messages, text messages (including "tweeting") and social network postings.

I will work at achieving my personal best and not to get discouraged if it is not THE best.

I will do my best to be a true team player by being supportive of my team mates and by not criticizing or placing blame on others.

I will remember that winning isn't everything – that having fun, improving skills, making friends and doing my best are also important.

I will acknowledge all good plays/performances – those of my team and my opponents.

I will remember that coaches and umpires are there to help me. I will accept their decisions and show them respect.

I will respect and comply with the decisions of the Discipline Committee

### **CODE FOR PARENTS AND SPECTATORS**

I will remember that young athletes play sport for their enjoyment. They are not playing to entertain me.

I will not have unrealistic expectations. I will remember that young athletes are not miniature professionals and cannot be judged by professional standards.

I will respect and, where applicable, comply with the umpires' decisions and decisions of the Discipline Committee and I will encourage participants to do the same.

I will never ridicule an athlete for making a mistake during a competition. I will give positive comments that motivate and encourage continued effort.

I will condemn the use of violence in any form and will express my disapproval in an appropriate manner to coaches and Club officials.

I will show respect for my team's opponents and the umpires, because without them there would be no game.

I will not use bad language, nor will I harass or heckle athletes, coaches, umpires, other spectators, or Club officials by way of emails, voice messages, text messages (including "tweeting") and social network postings.

I will applaud the value and effort of volunteer coaches, assistant coaches, managers, and Club officials.

### **CODE FOR UMPIRES**

I will officiate by the rules.

I will ensure that I am knowledgeable of the rules.

I will control my temper. Personal criticism of any person by word or gesture is unacceptable.

I will show respect for the participants and their skills.

I will refrain from profanity. Verbal abuse towards players, managers, coaches, officials or spectators will not be tolerated including emails, voice messages, text messages (as well as "tweeting") and social network postings.

I will not allow use of tobacco, alcohol or drugs (unless prescribed by a licensed physician) on the field or in the dugout or in the vicinity thereof.

I will be friendly to all participants and encourage players to ask me to clarify any call, whether it is a judgment call or a decision on the Rules.

I will generally warn players of unacceptable behaviour before taking further action for a second offence, although I reserve the right to eject a player for a first offence

# **APPENDIX 1 - HARASSMENT, ABUSE, BULLYING AND MISCONDUCT POLICY**

## **INTRODUCTION**

This document includes Policies and Procedures that enhance the Baseball Ontario Association Harassment, Bullying and Abuse Policies.

The following policies have been approved by the TBC Board of Directors. It shall be the obligation of all TBC participants to adhere to these policies.

Please refer to the following for more information: Baseball Ontario's Policy on Harassment and Abuse – [www.baseballontario.ca](http://www.baseballontario.ca)

## **1. POLICY STATEMENTS**

**1.1** The TBC is committed to provide an environment that is safe and respectful. The TBC supports the right of all its members and staff to participate and work in an environment that prohibits discriminatory practices of all kinds and promotes equitable opportunities.

**1.2** It is the policy of the TBC that there be no harassment, abuse, bullying or misconduct of any participant in any of its programs.

**1.3** The TBC expects every athlete, coach, assistant coach, trainer, manager, official, parent, director, officer, volunteer, employee and chaperone within the TBC to take reasonable steps to safeguard the participants against harassment, abuse, bullying or misconduct.

**1.4** The TBC will make all reasonable efforts to promote awareness of the problems of harassment, abuse, bullying and misconduct among all its members.

## **2. DEFINITIONS**

### **2.1 Legislation**

Child Protection Legislation – Ontario Child and Family Services Act (CFSA)

<http://www.canlii.org/en/on/laws/stat/rso-1990-c-c11/latest/rso-1990-c-c11.html>

<http://www.children.gov.on.ca/htdocs/English/topics/childrensaid/reportingabuse/index.aspx>

Human Rights Legislation – the Canadian Human Rights Act or the Ontario Human Rights Code

<http://laws-lois.justice.gc.ca/eng/acts/h-6/>

<http://www.ohrc.on.ca/en/ontario-human-rights-code>

## **2.2 Child**

In the Province of Ontario Child means a person between the age of 0 and 18 years.

## **2.3 Adult**

Adult means a person who has reached the age of majority. In the Province of Ontario this age is 18 years.

## **2.4 Bullying**

Bullying describes behaviours that are similar to harassment but occur between children that are not addressed under human rights laws. Bullying can be broken down into six categories:

### **2.4.1 Physical Bullying:**

Includes but is not limited to hitting, punching, shaking, shoving, kicking, spitting on, grabbing, beating others up, damaging or stealing another person's property.

### **2.4.2 Verbal Bullying:**

Includes but is not limited to name calling, hurtful teasing, intimidating, humiliating, or threatening someone, yelling, degrading behaviors; may happen over the phone, through text messaging or chat rooms, through social media sites, in notes or in person.

### **2.4.3 Relational Bullying:**

Trying to ostracize or cut off victims from social connection by convincing peers to exclude or reject a certain person, spreading rumours or giving the "silent treatment". This may happen in person, over the phone- or through the computer.

### **2.4.4 Discriminatory Bullying:**

Discriminatory bullying targets people because of their sexual orientation, ethnicity, gender identity, skin colour, religion, weight, height, gender, appearance, disability, nationality, or other things that are perceived to make them "different".

### **2.4.5 Reactive Bullying:**

Engaging in bullying as well as provoking bullies to attack a victim by taunting them.

### **2.4.6 Cyber Bullying:**

Involves the use of information and communication technologies such as e-mail, cell phones and text messaging, camera phones, instant messaging, social networking sites such as Facebook, Twitter, Instagram, Tumblr, Flickr, Myspace etc., defamatory personal websites (Network 54), or other forms of electronic information transfer to support deliberate, repeated and hostile behaviour by an individual or group that is intended to harm others, threaten, harass, embarrass, socially exclude or damage reputations and friendships.

Bullying is not...

- Conflict between friends
- An argument between people of equal power
- Accidental
- Normal relational development challenges
- A "one-time" event (usually)
- Friendly teasing that all parties are enjoying
- Something people grow out of

Bullying is...

- Hurting behaviours based on oppression and "meanness"
- Based on power differentials
- Intentionally harmful
- Intense and often long in duration
- Repeated over time (generally)
- Oppressive – isolates victims
- Caused by many factors and behavioural challenges

## **2.5 Harassment**

Harassment is defined as conduct, gestures or comments which are insulting, intimidating, humiliating, hurtful, malicious, degrading or otherwise offensive to an individual or group of individuals which create a hostile or intimidating environment for work or sports activities, or which negatively affect performance or work conditions. Any of the different forms of harassment must be based on a prohibited ground of discrimination in the Ontario Human Rights Legislation, including age, citizenship, colour, disability, ethnicity or place of origin, family status, gender identity or gender expression, marital status, race, record of offences or pardoned conviction, religion or creed, sex (including pregnancy or breastfeeding), sexual orientation.



Types of behaviour which constitute harassment include, but are not limited to:

- Unwelcomed jokes, innuendo or teasing about a person's looks, body, attire, ethnic origin, age, gender identity, race, colour, religion, nationality, sex or sexual orientation.
- Condescending, patronizing, threatening, or punishing actions, **based on a ground of discrimination**, which undermine self-esteem or diminish performance.
- Practical jokes **based on a ground of discrimination**, which cause awkwardness or embarrassment, endanger a person's safety, or negatively affects performance.
- Unwanted or unnecessary physical contact including touching, patting, or pinching (in the case of minors, this is defined as abuse under the Child and Family Services Act).
- Unwelcome flirtation, sexual advances, requests, or invitations (if minor involved, covered under Child Protection Legislation).
- Behaviours such as those described above which are not directed towards individuals or groups, but which have the effect of creating a negative or hostile environment.

### **What is criminal harassment?**

Criminal harassment—often known as stalking—involves following another person; monitoring them or someone close to them, or their home; contacting them repeatedly against their wishes or threatening them. For a charge of criminal harassment to be laid, the victim must have reason to fear for his/her safety (or the safety of someone else) and the perpetrator must know - or could reasonably be expected to know—that the victim is fearful (Family Violence in Canada, A Statistical Profile, 2001). Criminal charges may also be laid in harassment cases if a person has been physically or sexually assaulted.

### **2.6 Abuse**

Child abuse is any form of physical, emotional and/or sexual mistreatment or lack of care, which causes physical injury or emotional damage to a child. A common characteristic of all forms of abuse against children and youth is an abuse of power or authority and/or breach of trust.

### **2.6.1 Emotional Abuse**

Emotional abuse is a chronic attack on a child's self-esteem; it is psychologically destructive behaviour by a person in a position of power, authority, or trust. It can take the form of name-calling, threatening, ridiculing, berating, intimidating, isolating, hazing, or ignoring the child's needs but it is not simply benching a player for disciplinary reasons, cutting a player from a team after tryouts, refusing to transfer a player, limiting play time and yelling instructions from the bench.

### **2.6.2 Physical Abuse**

Physical abuse is when a person in a position of power or trust purposefully injures or threatens to injure a child. This may take the form of slapping, hitting, shaking, kicking, pulling hair or ears, throwing, shoving, grabbing, hazing or excessive exercise as a form of punishment.

### **2.6.3 Neglect**

A general definition of neglect is the chronic inattention to the basic necessities of life such as clothing, shelter, nutritious diets, education, good hygiene, supervision, medical and dental care, adequate rest, safe environment, moral guidance and discipline, exercise and fresh air.

#### **Some examples of neglect occurring in a sport environment are:**

- Inadequate Shelter/Unsafe Environments: Failure to maintain equipment or facility; forcing athletes to participate without proper protective equipment.
- Inadequate Clothing: Preventing athletes from dressing adequately for weather conditions or making them stay in wet clothes as punishment following a game. - Inadequate Supervision: Leaving young athletes unsupervised on the field or on a team trip
- Lack of Medical/Dental Care: Ignoring or minimizing injuries; ignoring medical advice; not seeking medical or dental attention when warranted.
- Inadequate Education: Encouraging athletes to not do homework, to not attend school, or to drop out.
- Inadequate Rest: Overdoing or increasing workouts as punishment; prohibiting adequate sleeping or resting time.
- Inadequate Moral Guidance & Discipline: Not providing adequate supervision during team functions; hiring strippers or prostitutes; offering pornography to young athletes.

## **2.6.4 Sexual Abuse**

Sexual abuse is when a child is used by a child with more power or an adult for his or her own sexual stimulation or gratification. There are two categories of sexual abuse: contact and non-contact.

### **2.6.4.1 Contact**

- Touch and fondled in sexual areas
- Forced to touch another person's sexual areas
- Kissed or held in a sexual manner
- Forced to perform oral sex
- Vaginal or anal intercourse
- Vaginal or anal penetration with object or finger
- Sexually oriented hazing

### **2.6.4.2 Non-Contact**

- Obscene calls/remarks on a computer, cell phone or in notes
- Voyeurism
- Shown pornography
- Forced to watch sexual acts
- Sexually intrusive questions or comments
- Indecent exposure
- Forced to pose for sexual photographs or videos
- Forced to self-masturbate
- Forced to watch others masturbate

## **Duty to Report**

Abuse and neglect are community problems requiring urgent attention. The TBC is committed to help reduce and prevent the abuse and neglect of its participants. The TBC realizes that persons working closely with children and youth have a special awareness of abusive situations. Therefore, these people have a particular reporting responsibility to ensure the safety of Canada's young, by knowing their provincial protection legislation and following through as required.

The Province of Ontario has mandatory reporting laws regarding the abuse and neglect of children and youth, which are contained in Section 72 of the Child and Family Services Act (CFSA).

Consequently, it is the policy of the TBC that any TBC personnel (part-time and full-time staff, volunteer, participant, team official, on ice official) or TBC partner (parent, guardian) who, has reasonable grounds to suspect that a participant is or may be suffering or may have suffered from emotional, physical abuse and neglect and/or sexual abuse shall immediately report the suspicion and the information on which it is based to the local child protection agency and/or the local police detachment. In Ontario a person is considered a child up to the age of eighteen. Those involved with the TBC in providing baseball opportunities for participants understand and agree that abuse or neglect, as defined above, may be the subject of a criminal investigation and/or disciplinary procedures. Failure to report an offence and thereby, failure to provide safety for participants may render the adult who keeps silent legally liable for conviction under the CFSA.

## **2.7 Hazing**

Hazing is an initiation practice that may humiliate, demean, degrade or disgrace a person regardless of location or consent of the participant(s).

## **2.8 Misconduct**

Misconduct refers to the behaviour or a pattern of behaviour that is found, by a formal (for example an independent investigation) or informal process ( for example an internal fact finding), to be contrary to the TBC Code of Conduct and that is not harassment, abuse or bullying.

## **2.9 Complaint**

Any allegation, verbal or written, that involves bullying, harassment, abuse or misconduct within the jurisdiction of the TBC.

## **2.10 TBC Personnel**

TBC personnel include TBC office employees, council members, Directors and Officers and any other personnel that may be identified by the TBC President.

# **3. RECEIVING A COMPLAINT**

## **3.2 TBC Responsibility:**

**3.2.1** If a Complaint is directed to the attention of the TBC, all relevant information will be forwarded to Thornhill Baseball Club for follow up and/or investigation.

**3.2.2** If a Complaint concerns a TBC Officer, Director or representatives while acting in the capacity of their TBC position or TBC Staff, the complaint will be handled either by the TBC President or the Baseball Ontario when deemed appropriate.

**3.2.3** Upon notification of a Complaint the TBC will report the situation and all relevant information to the Baseball Canada Insurance Department in accordance with Baseball Ontario guidelines.

**3.2.4** If a Complaint is addressed to the TBC but relates to an action within a Member Association of York Simcoe Baseball Association not warranting further investigation by the TBC, the TBC President will request the relevant YSBA Member Association to conduct an investigation within an agreed time frame. The Complaint will be referred to that Member Association to be dealt with in accordance with this policy and the Member Association's policies.

## **4. COMPLAINT ADMINISTRATION**

**4.1** Complaints of abuse, harassment, bullying or misconduct may be handled informally where possible, or formally, but within a reasonable time frame.

**4.2** The TBC is not required to deal with all complaints. The TBC may decide not to deal with the complaint if it is of the opinion that it could be more appropriately dealt with under another policy, rule, or regulation; is frivolous, vexatious or made in bad faith; is not within the governing body's jurisdiction.

**4.3** The TBC will not deal with any complaint of abuse as defined in the Child Protection Legislation. Information will be forwarded to the police or appropriate child protective agency to investigate.

**4.3.1** During an investigation by the police or appropriate child protective agency the individual under investigation would be removed from participation.

**4.3.2** If a complaint of abuse of a child participant results in a conviction, the TBC will exclude the individual convicted from there position.

**4.3.3** If a complaint of abuse of a child participant does not result in a conviction, the TBC may nevertheless discipline the individual subject to the complaint having merit.

**4.3.4** Consideration of time served during the investigation will be taken into account in any further discipline applied.

**4.4** Complaints of abuse, harassment, bullying or misconduct will not qualify a player for an automatic release or transfer. This is to ensure the safety of all players on the team, not just the one initiating the complaint. If a complaint is substantiated, the primary option is to address the behaviour of the offending party which may include disciplinary action up to and including suspension or removal.

## **5. INVESTIGATION**

**5.1** In order to remain impartial for the purpose of hearing appeals, the TBC will not engage in investigations except:

- (a) where it is inappropriate for the TBC to do so, or
- (b) if the initial investigation was conducted incorrectly as determined by the TBC, or (c) if the complaint relates to a participant of one Member Association launched by a participant of another Member Association.

**5.2** All investigations of harassment, bullying or misconduct will be conducted in accordance with the TBC Policy. Disclosure of any part of the final report will be provided at the discretion of the TBC President.

**5.3** When the TBC is conducting an investigation, the report resulting therefrom, will be received by the TBC President for review and determination.

**5.4** The TBC will appoint an Independent Fact Finder to conduct an investigation it initiates.

**5.5** Any decision for the TBC to contact the police on the basis of an Investigation Report will be made by the TBC President.

## **6. INVESTIGATION DECISIONS**

The following decisions resulting from any investigation may be made:

- 1** the complaint is with merit;
- 2** the complaint is without merit;
- 3** there is insufficient information to enable a conclusive decision to be made; or **4** the complaint is outside of the jurisdiction of the investigating body.

## **7. DISCIPLINE**

**7.1** Any athlete, coach, assistant coach, trainer, manager, official, parent, director, officer, volunteer, employee or chaperone within the TBC found in violation of the TBC Harassment, Abuse, Bullying and Misconduct Policy or the TBC Code of Conduct may be disciplined up to and including dismissal from the league in accordance with the TBC Constitution, By-laws and Regulations.

**7.2** Any athlete, coach, assistant coach, trainer, manager, official, parent, director, officer, volunteer, employee or chaperone within the TBC who knowingly brings a false complaint against a TBC participant may be disciplined up to and including dismissal from the league in accordance with the TBC Constitution, Bylaws and Regulations.

**7.3** Any athlete, coach, assistant coach, trainer, manager, official, director, officer, volunteer or employee or chaperone who is the subject of a complaint of harassment, abuse, bullying or misconduct may be suspended from his or her position, or made subject to other precautions taken for the duration of an investigation. This action will be reviewed by the TBC President or other designate on a case by case basis in accordance with the TBC Constitution, By-laws and Regulations.

**7.4** Any coach, assistant coach, trainer, manager, official, director, officer, volunteer, employee or chaperone who is discovered by means other than a criminal record check to have a conviction that may impact upon their position, may be disciplined up to and including dismissal from the league and/or revocation of membership in accordance with the TBC Constitution, By-laws and Regulations.

## **8. SANCTIONS**

**8.1** When directing appropriate disciplinary sanctions, the TBC shall consider factors such as:

- a) The nature and severity of the harassment and bullying information.

- b) Whether the harassment and bullying involved any physical contact.
- c) Whether the harassment and bullying was an isolated incident or part of an ongoing pattern.
- d) The nature of the relationship between the complainant and the respondent.
- e) The age of the complainant and of the respondent.
- f) Whether the respondent has been involved in any previous harassment and bullying incidents.
- g) Whether the respondent admitted responsibility and expressed a willingness to change.
- h) Whether the respondent retaliated against the complainant.; and
- i) Any other factor the TBC Board of Directors considers appropriate in the circumstances of the case.

**8.2** In directing disciplinary sanctions, the TBC may consider the following options, singly or in combination, depending on the nature and severity of the harassment and bullying:

- a) Verbal apology
- b) Written apology
- c) Letter of reprimand from the TBC
- e) Referral to counselling
- f) Removal of certain privileges of participation or employment
- g) Temporary suspension
- h) Suspension from participation
- i) Expulsion from participation
- j) Publication of the details of the sanction
- k) Any other sanction that the TBC may deem appropriate in its unfettered discretion.

**8.3** Failure to comply with a sanction as determined by the TBC shall result in automatic suspension from TBC and notification to YSBA Affiliate organizations, until such time as the sanction is fulfilled.

**8.4** Any individual participating in TBC coaching, business, activities or events who is or has been convicted of a criminal offense involving sexual exploitation, invitation to sexual touching, sexual interference, sexual assault, shall not participate in coaching or volunteering with a team.



**8.5** Notwithstanding the procedures set out in this policy, any individual participating in TBC coaching, business, activities or events who is convicted of a criminal offense involving sexual exploitation, invitation to sexual touching, sexual interference, sexual assault, shall face automatic suspension from participating in any activities of the TBC for a period of time corresponding to the length of the criminal sentence imposed by the Court, and may face further disciplinary action by the TBC in accordance with this policy.

## **9. APPEALS**

**9.1** Except where otherwise provided, an appeal of any disciplinary matter will be regulated and heard in accordance with TBC Constitution.

The full TBC Harassment, Abuse, Bullying & Misconduct Policy is available on the TBC website:

[www.ThornhillBaseball.net](http://www.ThornhillBaseball.net)

## **APPENDIX B – LINKS TO RESOURCES**

Cyberbullying Resources

<http://www.getcybersafe.gc.ca>

<http://www.needhelpnow.ca>

<http://www.preynet.ca>

Tip Sheet on Cyberbullying

<http://www.opp.ca/ecms/files/250363910.6.pdf>