

NIAGARA FALLS ROWING CLUB

CODE OF CONDUCT AND ETHICS

Effective date	April 1, 2026
Archived date	-
Date last reviewed	March 31, 2026
Scheduled review date	April 1, 2028
Replaces and/or amends	Code of Conduct and Ethics 2022
Approved by and date	Board of Directors, March 31, 2026
Appendix(-ces) to this Policy	-

Purpose

1. The purpose of this Code is to ensure a safe and positive environment within the programs, activities, and Events of NIAGARA FALLS ROWING CLUB by making Individuals aware that there is an expectation, at all times, of appropriate behaviour consistent with the applicable organization’s core values and policies. NIAGARA FALLS ROWING CLUB supports equal opportunity, prohibit discriminatory practices, and is committed to providing an environment in which all Individuals can safely participate in our sport and are treated with respect and fairness.

Application of this Code

2. This Code applies to any Individual’s conduct during the business, activities, and Events of NIAGARA FALLS ROWING CLUB including, but not limited to, competitions, practices, evaluations (including time trials or any other form of testing), treatment or consultations (e.g., massage therapy), training camps, travel associated with organizational activities, the office environment, and any meetings or social Events.
3. This Code also applies to Individuals’ conduct outside of the business, activities, and Events of NIAGARA FALLS ROWING CLUB when such conduct adversely affects the organization’s relationships (and the work and sport environment) or is detrimental to the image and reputation of NIAGARA FALLS ROWING CLUB. Such applicability will be determined by the Independent Third Party at its sole discretion.
4. This Code applies to Individuals active in the sport of rowing or who have retired from the sport of rowing where any claim regarding a potential breach of this Code occurred when the Individual was active in the sport.
5. In addition, breaches of this Code may occur when the Individuals involved interacted due to their mutual involvement in the sport of rowing or, if the breach occurred outside of the sport environment, if the breach has a serious and detrimental impact on the Individual(s).
6. Any Individual who violates this Code may be subject to sanctions pursuant to the *Complaints and Discipline Policy*. In addition to facing possible sanctions pursuant to the *Complaints and Discipline Policy*, an Individual who violates this Code during a competition may be removed from the competition or training area, and the Individual may be subject to further sanctions.

UCCMS

7. NIAGARA FALLS ROWING CLUB has adopted the UCCMS which shall be incorporated into this Code by reference as if set out in full herein. Any modifications or amendments made to the UCCMS shall come into effect immediately upon their adoption, without the need for any further action by NIAGARA FALLS ROWING CLUB.

Responsibilities

8. All Individuals have a responsibility to:
 - a) Refrain from behaviour that constitutes Discrimination, Harassment, Workplace Harassment, Maltreatment and Prohibited Behaviour or Workplace Violence under this *Code of Conduct and Ethics* and the UCCMS
 - b) Maintain and enhance the dignity and self-esteem of other Individuals by:
 - i. Treating each other with the highest standards of respect and integrity;
 - ii. Focusing comments or criticism appropriately and avoiding public criticism of Athletes, Athlete Support Personnel, umpires, officials, organizers, volunteers, employees, or other Individuals;
 - iii. Consistently demonstrating the spirit of sportsmanship, sport leadership, and ethical conduct;
 - iv. Acting to correct or prevent practices that are unjustly discriminatory;
 - v. Consistently treating Individuals fairly and reasonably; and
 - vi. Ensuring adherence to the rules of the sport and the spirit of those rules.
 - c) Refrain from the use of power or authority in an attempt to coerce another person to engage in inappropriate activities
 - d) Adhere to all federal, provincial, municipal and host country laws.
 - e) Not consume alcohol, tobacco products, vaping products, cannabis, or other recreational drugs while participating in any RCA or Member programs, activities, Events or while in the Workplace of Rowing Canada Aviron or a Member. Individuals subject to the Canadian Anti-Doping Program or the anti-doping rules of any other Anti-Doping Organization with authority over the Individual must also comply with such rules in any of the aforementioned situations.
 - f) Notwithstanding Section 8e), in the context of a designated social Event, as permitted by provincial and other relevant laws, responsible consumption of legal substances is permitted in adult-oriented social Events, but reasonable steps must be taken to manage responsible consumption. However, there will be zero tolerance for excessive consumption, exhibiting inappropriate behaviour due to consumption of any legal substance, or any conduct that could violate the Canadian Anti-Doping Program or the anti-doping rules of any other Anti-Doping Organization with authority over the Individual.
 - g) Respect the property of others and not wilfully cause damage
 - h) Promote sport in the most constructive and positive manner possible
 - i) When driving a vehicle or operating a coach boat or safety launch:
 - i. As applicable, have a valid driver or operator's licence (e.g., Pleasure Craft Operator Card issued by Transport Canada);
 - ii. Obey traffic laws and Transport Canada regulations at all times;
 - iii. Not be under the influence of alcohol, cannabis or illegal drugs or intoxicating substances;
 - iv. Have valid insurance; and
 - v. Refrain from using a mobile device or engaging in any activity that would constitute distracted driving.
 - j) Refrain from engaging in deliberate cheating which is intended to manipulate the outcome of a competition or para-classification, and/or refrain from offering or receiving any benefit which is intended to manipulate the outcome of a competition. A benefit includes the direct or indirect receipt of money or

other anything else of value, including, but not limited to, bribes, gains, gifts, preferential treatment, and other advantages.

- k) Comply, at all times, with the by-laws, policies, procedures, and rules and regulations of NIAGARA FALLS ROWING CLUB and those of any other sport organization with authority over the Individual, including RCA and the relevant Provincial Rowing Association, as applicable and as adopted and amended from time to time. Take time to be educated and understand the expectations associated with the relevant policies.

Directors, Committee Members, and Staff

- 9. In addition to the Individual's responsibilities above, directors, committee members, and staff of NIAGARA FALLS ROWING CLUB will have additional responsibilities to:
 - a) When performing their role as a director or committee member or staff member of NIAGARA FALLS ROWING CLUB, ensure that they respect their duty of loyalty to NIAGARA FALLS ROWING CLUB, and refrain from engaging in any activity or behaviour that could constitute a conflict of interest. Disclose any conflict of interest, or perceived conflict of interest, that they may have to appropriate organization.
 - b) Ensure their loyalty prioritizes the interests of NIAGARA FALLS ROWING CLUB
 - c) Act with honesty and integrity and conduct themselves in a manner consistent with the nature and responsibilities of the business and the maintenance of Individuals' confidence
 - d) Ensure that financial affairs are conducted in a responsible and transparent manner with due regard for all fiduciary responsibilities
 - e) Conduct themselves openly, professionally, lawfully and in good faith
 - f) Be independent and impartial and not be influenced by self-interest, outside pressure, expectation of reward, or fear of criticism
 - g) Behave with decorum appropriate to both circumstance and position
 - h) Exercise the degree of care, diligence, and skill required in the performance of their duties pursuant to applicable laws
 - i) Respect the confidentiality appropriate to issues of a sensitive nature
 - j) Respect the decisions of the majority and resign if unable to do so
 - k) Commit the time to attend meetings and be diligent in preparation for, and participation in, discussions at such meetings
 - l) Have knowledge and understanding of all relevant policies and procedures.

Athlete Support Personnel

- 10. In addition to the Individual's responsibilities above, Athlete Support Personnel have many additional responsibilities. They must understand and respect the inherent Power Imbalance that exists in these relationships and must not abuse it, either consciously or unintentionally. Athlete Support Personnel will:
 - a) Avoid any behaviour that abuses the Power Imbalance inherent in an Athlete Support Personnel position to (i) establish or maintain a sexual relationship with an Athlete, or (ii) encourage inappropriate physical or emotional intimacy with an Athlete, regardless of the Athlete's age.
 - b) Ensure a safe environment by selecting activities and establishing controls that are suitable for the age, experience, ability, and fitness level of the Athletes.
 - c) Prepare Athletes systematically and progressively, using appropriate time frames and monitoring physical and psychological adjustments while refraining from using training methods or techniques that may harm Athletes.
 - d) When requested, communicate and cooperate with sport medicine professionals in the diagnosis, treatment, and management of any Athlete's medical situation.

- e) Support the Athlete Support Personnel of a training camp, provincial team, or national team, should an Athlete qualify for participation with one of these programs.
- f) Accept and promote Athletes' personal goals and refer Athletes to other Athlete Support Personnel as appropriate.
- g) Provide Athletes (and the parents/guardians of Minor Athletes) with the information necessary to be involved in the decisions that affect the Athlete.
- h) Act in the best interest of the Athlete's development as a whole person
- i) Comply with all established responsibilities and obligations as set out by the professional's governing body, if any.
- j) Under no circumstances provide, promote, or condone the use of drugs (other than properly prescribed medications) or Prohibited Substances or Prohibited Methods and, in the case of minors, alcohol, cannabis, and/or tobacco.
- k) Respect Athletes competing for other clubs, provinces or countries and, in dealings with them, not discuss topics or take actions which are deemed to be within the realm of 'coaching', unless after first receiving approval from the coaches who are responsible for the Athletes.
- l) Not engage in a sexual or intimate relationship with an Athlete of any age in which the Athlete Support Personnel is in a position of trust or authority.
- m) Recognize the power inherent as an Athlete Support Personnel and respect and promote the rights of all participants in sport. This is accomplished by establishing and following procedures for confidentiality (right to privacy), informed participation, and fair and reasonable treatment. Athlete Support Personnel have a special responsibility to respect and promote the rights of participants who are in a vulnerable or dependent position and less able to protect their own rights.
- n) Dress appropriately.
- o) Use inoffensive language, and take the audience being addressed into account (e.g., the age/maturity of the participants).

Athletes

11. In addition to the Individual's responsibilities above, Athletes will have additional responsibilities to:
- a) Adhere to their athlete agreement (if applicable)
 - b) Report any medical problems in a timely fashion, when such problems may limit their ability to travel, practice, or compete
 - c) Participate and appear on-time and prepared to participate to the best of their abilities in all competitions, practices, training sessions, and evaluations (including time controls or any other form of testing)
 - d) Properly represent themselves and not attempt to participate in a competition for which they are not eligible by reason of age, classification, or other reason
 - e) Adhere to any rules and requirements regarding clothing and equipment
 - f) Dress to represent the sport and themselves appropriately
 - g) Act in accordance with applicable policies and procedures and, when applicable, additional rules as outlined by Athlete Support Personnel.

Umpires

12. In addition to the Individual's responsibilities above and those found in the RCA Rules of Racing, umpires will have additional responsibilities to:
- a) Maintain and update their knowledge of the Rules of Racing and any rule changes
 - b) Not publicly criticize any Individual

- c) Place the safety and welfare of competitors, and the fairness of the competition above all else
- d) Strive to provide a fair sporting environment.
- e) Work within the boundaries of their position's description while supporting the work of other umpires and follow the direction of Chief Umpires
- f) Act as an ambassador of the sport of rowing by agreeing to enforce and abide by national and provincial/territorial rules and regulations
- g) Take ownership of actions and decisions made while umpiring
- h) Respect the rights, dignity, and worth of all Individuals
- i) Act openly, impartially, professionally, lawfully, and in good faith
- j) Be fair, equitable, considerate, independent, honest, and impartial in all dealings with others
- k) Respect the confidentiality required by issues of a sensitive nature, which may include discipline processes, appeals, and specific information or data about Individuals
- l) Honour all assignments unless unable to do so by virtue of illness or personal emergency, in which case they must communicate their situation to the Individual(s) responsible for assignments as soon as possible, including, if already at a regatta, the Chief Umpire
- m) When writing reports, set out the actual facts to the best of their knowledge and recollection
- n) Dress in appropriate attire for umpiring
- o) Never umpire at a Canadian regatta that is not sanctioned by RCA.
- p) Where applicable, adhere at all times to the rules of World Rowing, as well as the rules of any other sport organization that has relevant and applicable authority over the umpire.

Parents/Guardians and Spectators

13. In addition to the Individual's responsibilities above, parents/guardians and spectators at Events will, at all times:
- a) Encourage Athletes to compete within the rules and to resolve conflicts without resorting to hostility or violence
 - b) Condemn the use of violence in any form
 - c) Never ridicule a participant during a competition or practice
 - d) Respect the decisions and judgments of umpires and officials, and encourage Athletes to do the same
 - e) Support all efforts to eliminate verbal and physical abuse, coercion, intimidation, and sarcasm
 - f) Respect and show appreciation to all competitors, Athlete Support Personnel, umpires, officials and other volunteers
 - g) Never harass Individuals, competitors, Athlete Support Personnel, umpires, officials, parents/guardians, or other spectators
 - h) Never encourage, aid, cover up, or assist an Athlete in cheating through doping, competition manipulation, or other behaviours which may be considered cheating.

Anti-Doping

14. NIAGARA FALLS ROWING CLUB shall adopt and adhere to the Canadian Anti-Doping Program. NIAGARA FALLS ROWING CLUB will respect any sanction imposed on any Individual as a result of a breach of the Canadian Anti-Doping Program or any other applicable anti-doping rules.

15. All Athletes shall:

- a) Abstain from the non-medical use of medications or drugs or the use of Prohibited Substances or Prohibited Methods as listed on the version of the World Anti-Doping Agency's Prohibited List currently in force.

16. All Individuals shall:

- a) Refrain from associating with any person for the purpose of coaching, training, competition, instruction, administration, management, athletic development, or supervision, who has been found to have committed an anti-doping rule violation and is serving a period of ineligibility imposed pursuant to the Canadian Anti-Doping Program or any other applicable anti-doping rules.
- b) Cooperate with any Anti-Doping Organization that is conducting an investigation into any anti-doping rule violation(s).
- c) Refrain from any offensive conduct toward a Doping Control official or other individual involved in Doping Control, whether or not such conduct constitutes Tampering as defined in the Canadian Anti-Doping Program.

17. All Athlete Support Personnel or other Persons who are Using a Prohibited Substance or Prohibited Method without a valid and acceptable justification shall refrain from providing support to Athletes that fall under NIAGARA FALLS ROWING CLUB's jurisdiction.

Retaliation, Retribution or Reprisal

18. It is a breach of this Code of Conduct and Ethics for any Individual to engage in any act that threatens or seeks to intimidate another Individual with the intent of discouraging that Individual from filing, in good faith, a Report pursuant to any NIAGARA FALLS ROWING CLUB policy, as applicable. It is also a breach of this Code of Conduct and Ethics for an Individual to file a Report for the purpose of retaliation, retribution or reprisal against any other Individual. Any Individual found to be responsible for this behaviour shall be liable for the costs related to the disciplinary process required to establish such a breach.

Privacy

19. The collection, use and disclosure of any personal information pursuant to this Policy is subject to NIAGARA FALLS ROWING CLUB's Privacy Policy.

NIAGARA FALLS ROWING CLUB

PROTECTION POLICY

Effective date	April 1, 2026
Archived date	-
Date last reviewed	March 31, 2026
Scheduled review date	April 1, 2028
Replaces and/or amends	Athlete Protection Policy 2022
Approved by and date	Board of Directors, March 31, 2026
Appendix(-ces) to this Policy	Appendix A – Image Consent Form

Purpose

1. This Protection Policy describes how Persons in Authority shall maintain a safe sport environment for all.

Interactions between Persons in Authority and Athletes – the ‘Rule of Two’

2. NIAGARA FALLS ROWING CLUB strongly recommends the ‘Rule of Two’ for all Persons in Authority who interact with Athletes, whether in person or remotely (i.e., in virtual settings).
3. NIAGARA FALLS ROWING CLUB recognizes that fully implementing the ‘Rule of Two’, at the highest standard of two screened and trained Athlete Support Personnel in all circumstances, may not always be possible. Consequently, at a minimum, interactions between Persons in Authority and Athletes must respect the following:
 - i. The training and competition environments should be open to observation so that all interactions between Persons in Authority and Athletes and/or any Vulnerable Participants are observable.
 - ii. Private or one-on-one situations must be avoided unless they are open and observable by another adult or Athlete.
 - iii. Persons in Authority shall not invite or have a Vulnerable Participant (or Vulnerable Participants) in their home without the written permission and contemporaneous knowledge of the Vulnerable Participant's parent or guardian.
 - iv. Vulnerable Participants must not be in any situation where they are alone with a Person in Authority without another screened adult or Athlete present unless prior written permission is obtained from the Vulnerable Participant's parent or guardian

Practices and Events

4. As it relates to practices and/or competitions, the following shall be respected:
 - a) A Person in Authority should never be alone with a Vulnerable Participant prior to or following a competition or practice unless the Person in Authority is the Vulnerable Participant's parent or guardian.
 - b) If the Vulnerable Participant is the first Athlete to arrive, the Vulnerable Participant's parent should remain until another Individual or Person in Authority arrives.

- c) If a Vulnerable Participant would potentially be alone with a Person in Authority following a competition or practice, the Person in Authority should ask another Person in Authority (or a parent or guardian of another Athlete) to stay until all of the Athletes have been picked up. If an adult is unavailable, another Athlete, who is preferably not a Vulnerable Participant, should be present in order to avoid the Person in Authority being alone with a Vulnerable Participant.
- d) Persons in Authority giving instructions, demonstrating skills, or facilitating drills or lessons to an individual Athlete should always do so in an open and observable environment.
- e) If there is a concern with observing the Rule of Two, Persons in Authority and Athletes should take additional steps to achieve transparency and accountability in their interactions.

Communications

- 5. Communications between Persons in Authority and Athletes shall respect the following:
 - a) Group messages, group emails or team pages are to be used as the regular method of communication between Persons in Authority and Athletes
 - b) Persons in Authority may not communicate directly to individual Athletes except when necessary and only for communicating information related to team issues and activities (e.g., non-personal information). Any such texts, messages or emails shall be professional in tone and must be copied to another adult (preferably the Vulnerable Person's parent(s)/guardian(s)) when the Athlete is a Vulnerable Participant.
 - c) Parents and guardians may request that their child not be contacted by a Person in Authority using any form of electronic communication and/or to request that certain information about their child may not be distributed in any form of electronic communications
 - d) All communication between a Person in Authority and Athletes must be between the hours of 6:00am and 11:00pm unless extenuating circumstances justify otherwise (e.g., cancelling an early morning practice)
 - e) Communications concerning drugs or alcohol use (unless regarding its prohibition) is not permitted
 - f) No sexually explicit language or imagery or sexually oriented conversation may be communicated by any medium
 - g) Persons in Authority and Athletes are not permitted to offer or ask one another to keep a secret for them for any unethical, inappropriate, prohibited, or improper purpose

Virtual settings

- 6. The Rule of Two shall apply to all Vulnerable Participants in a virtual environment. Specifically:
 - a) For Athletes under the age of 16, where possible, a parent/guardian should be present during any virtual session;
 - b) Two certified and screened Athlete Support Personnel should be present or one with another adult (parent, guardian, volunteer). One-on-one virtual sessions are prohibited;
 - c) Coaches, and, where relevant, other Athlete Support Personnel, shall be informed by NIAGARA FALLS ROWING CLUB of the expected standards of conduct during virtual sessions;
 - d) Parents/guardians of Vulnerable Participants shall be informed by NIAGARA FALLS ROWING CLUB of the activities that will take place during the virtual session, as well as the process of the virtual session;
 - e) Parents/guardians of Vulnerable Participants shall provide consent to the Vulnerable Participant participating in the virtual session, if irregularly scheduled, or prior to the first session if the sessions will take place on a regular basis;

- f) Communications during virtual sessions shall take place in an appropriate open and observable environment. Sessions must be initiated in appropriate locations (i.e., not in personal or inappropriate locations such as bedrooms);
- g) Unless otherwise prohibited by professional regulations or where an Athlete and/or Vulnerable Participant does not provide consent, virtual sessions between Persons in Authority and Athletes and/or Vulnerable Participant must be recorded whenever allowed by the technology being used;
- h) Parents/guardians should debrief with Vulnerable Participants on a weekly basis regarding virtual sessions.

Travel

- 7. Any travel involving Persons in Authority and Athletes shall respect the following:
 - a) Teams or groups of Vulnerable Participants shall always have at least two Persons in Authority with them
 - b) For mixed gender teams or groups of Vulnerable Participants, there will be a mix of Persons in Authority acceptable to the Vulnerable Participants and their parents/guardians.
 - c) Screened parents or other volunteers will be available in situations when two Persons in Authority cannot be present
 - d) No Person in Authority may drive a vehicle with a Vulnerable Participant alone unless the Person in Authority is the Athlete's parent or guardian
 - e) A Person in Authority may not share a room or be alone in a hotel room with an Athlete unless the Person in Authority is the Athlete's parent or guardian
 - f) Room or bed checks during overnight stays must be done by two Persons in Authority
 - g) For overnight travel when Athletes must share a hotel room, roommates will be age-appropriate and, for Minors, shall be within two years of age of one another and of the same gender identity

Locker Room / Changing Areas

- 8. The following shall apply to locker rooms, changing areas, and meeting rooms:
 - a) Interactions (i.e., conversation) between Persons in Authority and Athletes should not occur in any room where there is a reasonable expectation of privacy such as a locker room, restroom or changing area unless there is an emergency. A second screened adult should be present for any necessary interaction between an adult and an Athlete in any such room. The Rule of Two must be respected.
 - b) If Persons in Authority are not present in the locker room or changing area, or if they are not permitted to be present, they should still be available outside the locker room or changing area where Vulnerable Participants are present and be able to enter the room or area if required, such as in an emergency.

Photography / Video

- 9. Any photograph or video involving Athletes shall respect the following:
 - a) Photographs and video may only be taken in public view, must observe generally accepted standards of decency, and be both appropriate for and in the best interest of the Athlete.
 - b) The use of recording devices in any location where there is a reasonable expectation of privacy is strictly prohibited.
 - c) Examples of photos that shall be edited or deleted include:
 - i. Images with misplaced apparel or where undergarments are showing
 - ii. Suggestive or provocative poses
 - iii. Embarrassing images

- d) Individuals (or parent/guardian in case of a Minor) should sign an image consent form (as part of the registration process) that describes how an Individual's image may be used by organization.
- e) Without consent, Individuals may not be photographed or filmed; and no images of Individuals may be posted publicly or privately. If consent is given, it may be revoked at any time.

Physical Contact

- 10. It is recognized that some physical contact between Persons in Authority and Athletes may be necessary for various reasons including, but not limited to, teaching a skill or tending to an injury. Any physical contact shall respect the following:
 - a) Unless it is otherwise impossible because of serious injury or other justifiable circumstance, a Person in Authority must always clarify with an Athlete where and why any physical contact will occur prior to the contact occurring. The Person in Authority must make clear that they are requesting to touch the Athlete and not requiring physical contact prior to the contact occurring.
 - b) Infrequent, non-intentional physical contact during a training session is permitted
 - c) Hugs lasting longer than five seconds, cuddling, physical horseplay, and physical contact unrelated to teaching a skill or tending to an injury initiated by the Person in Authority is not permitted. It is recognized that some Athletes may initiate hugging or other physical contact with a Person in Authority for various reasons (e.g., such as crying or celebrating after a performance), but this physical contact may only occur in an open and observable environment and should be limited in duration.

Enforcement

- 11. Any alleged violations of this *Protection Policy* shall be addressed pursuant to NIAGARA FALLS ROWING CLUB's *Complaints and Discipline Policy*.

Privacy

- 12. The collection, use and disclosure of any personal information pursuant to this Policy is subject to NIAGARA FALLS ROWING CLUB's Privacy Policy.

Appendix A – Image Consent Form

1. I hereby grant to Niagara Falls Rowing Club, and RCA and, as applicable, my Provincial Rowing Association (collectively the “Organizations”) on a worldwide basis, the permission to photograph and/or record the Participant’s image and/or voice on still or motion picture film and/or audio tape (collectively the “Images”), and to use the Images to promote the sport and/or the Organizations through traditional media such as newsletters, websites, television, film, radio, print and/or display form, and through social media such as Instagram, Facebook, YouTube, and Twitter. I understand that I waive any claim to remuneration for use of audio/visual materials used for these purposes. This consent will remain in effect in perpetuity; however, consent may be withdrawn by the Participant by the Participant notifying NIAGARA FALLS ROWING CLUB of such withdrawal in writing.
2. I hereby fully release, discharge, and agree to save harmless the Organizations, for any and all claims, demands, actions, damages, losses or costs that might arise out of the collection, use or disclosure of the Images or taking, publication, distortion of the Images, negatives, and masters or any other likeness or representation of the Participant that may occur or be produced in the taking of said Images or in any subsequent processing thereof, including without limitation any claims for libel, passing off, misappropriation of personality or invasion of privacy.
3. **I UNDERSTAND AND AGREE**, that I have read and understood the terms and conditions of this document. On behalf of me, my heirs and assigns, I agree that I am signing this document voluntarily and to abide by such terms and conditions.

Signed at this _____ day of _____, 20__.

Print Name of Participant: _____

Signature of Participant: _____

Signature of Parent/Guardian (if Participant is younger than the age of majority):
