

**SCREENING POLICY****Purpose**

1. Golf Ontario understands that screening personnel and volunteers is a vital part of providing a safe sporting environment. It has become a common practice among sport organizations that provide programs and services to the sport community to take reasonable steps to provide a safe and secure environment for participants in its programs, activities and events. The purpose of screening is to identify individuals who may pose a risk to Golf Ontario and its participation in the course of the individual's involvement in such programs, activities and events.

**Definitions**

2. The following defined terms appear in this Policy:
  - a) **Criminal Record Check (CRC)** – A search of the RCMP Canadian Police Information Centre (CPIC) system for adult convictions.
  - b) **Enhanced Police Information Check (E-PIC)** – a Criminal Record Check plus a search of Local Police Information, available from Sterling Backcheck.
  - c) **Local Police Information (LPI)** – Additional conviction and selected non-conviction information in national and local police data sources which may be relevant to the position sought.
  - d) **Vulnerable Sector Check (VSC)** – A detailed check that includes a search of the RCMP Canadian Police Information Centre (CPIC) system, Local Police Information, and the Pardoned Sex Offender database.

**Application of this Policy**

3. This Policy applies to all individuals whose position with Golf Ontario is one of trust or authority which may relate to, at a minimum, finances, supervision, or Vulnerable Participants.
4. Not all individuals associated with Golf Ontario will be required to obtain a criminal record check or submit screening documents because not all positions pose a risk of harm to Golf Ontario, or participants. Golf Ontario will determine which individuals will be subject to screening using the following guidelines:

Level 1 – Low Risk - Participants involved in low-risk assignments who are not in a supervisory role, not directing others, not involved with finances, and/or do not have unsupervised access to Vulnerable Participants. Examples:

- a) Parents, youth, or volunteers who are helping on a non-regular or informal basis.

Level 2 – Medium Risk – Participants involved in medium risk assignments who may be in a supervisory role, may direct others, may be involved with finances, and/or who may have limited access to Vulnerable Participants. Examples:

- a) Athlete support personnel
- b) Non-coach employees or managers
- c) Volunteer staff who may drive a Golf Ontario vehicle
- d) Golf Ontario sport staff including interns and IST (Internal support Team) support
- e) Golf Ontario finance and human resources staff
- f) Directors and members of work groups.
- g) Golf Ontario senior management and event staff
- h) Volunteers and committee members working at Golf Ontario events
- i) Officials
- j) 3<sup>rd</sup> party contractors acting on behalf of Golf Ontario

Level 3 – High Risk – Participants involved in high-risk assignments who occupy positions of trust and/or authority, have a supervisory role, direct others, are involved with finances, and who

---

**Golf Ontario – Screening Policy**

Adopted from Golf Canada Safe Sport Policies – November 2021  
Board approved on February 27, 2022

have frequent or unsupervised access to Vulnerable Participants. Examples:

- a) Golf Ontario contract coaches and management located at National Training Centers
- b) Full time coaches
- c) Coaches who travel with Athletes
- d) Coaches who could be alone with Athletes

### **Screening Committee**

5. The implementation of this policy is the responsibility of the Screening Committee which is a committee composed of either one (1) or three (3) members. Golf Ontario will ensure that the members appointed to their respective Screening Committees possess the requisite skills, knowledge and abilities to accurately screen documents and render decisions under this Policy.
6. The Screening Committee is responsible for reviewing all documents submitted and, based on the review, making decisions regarding the appropriateness of individuals filling positions within Golf Ontario. In carrying out its duties, the Screening Committee may consult with independent experts including lawyers, police, risk management consultants, or volunteer screening specialists.
7. Nothing in this Policy restricts or limits the Screening Committee from requesting that the individual attend an interview with the Screening Committee if the Screening Committee considers that an interview is appropriate and necessary to screen the individual's application.
8. Nothing in this Policy restricts or limits the Screening Committee from requesting the individual's authorization to contact any professional, sporting or other organization in order to assess the individual's suitability for the position that they are seeking.
9. Nothing in this Policy restricts or limits the Screening Committee from requesting further information from the individual on more than one occasion, subject to the individual's right to insist that the Screening Committee make a decision on the basis of the information before it.
10. The Screening Committee may, where appropriate, draw an adverse inference from an individual's failure to provide information or answer queries.
11. When assessing an individual's screening application, the Screening Committee shall determine whether there is reason to believe that the individual may pose a risk to Golf Ontario, to a Member, or to another individual.
12. An individual having been previously penalized for a prior offence shall not prevent the Screening Committee from considering that offence as part of the individual's screening application.
13. If the Screening Committee determines on the basis of the individual's screening application, in addition to any further material received by it, that the individual does not pose a risk to the members of Golf Ontario the Screening Committee shall approve the individual's application, subject to the Screening Committee's right to impose conditions.
14. In the case of a decision denying an application or approving an application with conditions, a copy of the decision shall be provided to the applicant and to the Board of Directors of Golf Ontario, which may disseminate the decision as they see fit in order to best fulfill the mandate of Golf Ontario.
15. A Participant whose screening application has been denied or revoked may not re-apply to participate in the programs or activities of Golf Ontario for two (2) years from the date the rejected application was made.

### **Screening Requirements**

16. A Screening Requirements Matrix is provided as **Appendix A**.

---

### **Golf Ontario – Screening Policy**

Adopted from Golf Canada Safe Sport Policies – November 2021  
Board approved on February 27, 2022

17. It is the policy of Golf Ontario that when an individual is first engaged by the organization:
- a) Level 1 individuals will:
    - i. Complete an Application Form (**Appendix B**) or other written submission
    - ii. Complete a Screening Disclosure Form (**Appendix C**)
    - iii. Participate in training, orientation, and monitoring as described in the Screening Requirements Matrix (**Appendix A**)
  - b) Level 2 individuals will:
    - i. Complete an Application Form or other written submission
    - ii. Complete a Screening Disclosure Form
    - iii. Complete and provide an E-PIC
    - iv. Provide references related to the position, as requested
    - v. Participate in training, orientation, and monitoring as described in the Screening Requirements Matrix (**Appendix A**)
    - vi. Provide a driver's abstract, if requested
  - c) Level 3 individuals will:
    - i. Complete an Application Form or other written submission
    - ii. Complete a Screening Disclosure Form
    - iii. Complete and provide an E-PIC and a VSC
    - iv. Provide references related to the position, as requested
    - v. Participate in training, orientation, and monitoring as described in the Screening Requirements Matrix (**Appendix A**)
    - vi. Provide a driver's abstract, if requested
  - d) If an individual subsequently receives a charge, conviction for, or is found guilty of, an offense they will report this circumstance immediately to Golf Ontario. Additionally, the individual will inform the organization of any changes in their circumstance that would alter their original responses in their Screening Disclosure Form.
  - e) If Golf Ontario learns that an individual has provided false, inaccurate, or misleading information, the individual will immediately be removed from their position and may be subject to further discipline in accordance with the *Discipline and Complaints Policy*.

**Renewal**

18. Unless the Screening Committee determines, on a case-by-case basis, to modify the submission requirements, individuals who are required to submit an E-PIC, Screening Disclosure Form, or Screening Renewal Form, are required to submit the documents as follows:
- a) An E-PIC every three years
  - b) A Screening Renewal Form (**Appendix D**) every year
  - c) A Vulnerable Sector Check every three years
19. At any time, including after either the submission of an individual's application or its approval (with or without conditions), the Screening Committee may re-open an individual's file for additional screening if it is advised of new information that, in the discretion of Golf Ontario, could affect the assessment of the individual's suitability for participation in the programs or activities of Golf Ontario, or the individual's interactions with other individuals involved with Golf Ontario (as applicable).

**Orientation, Training, and Monitoring**

20. The type and amount of orientation, training, and monitoring will be based on the individual's level of risk, at the discretion of Golf Ontario.
21. Orientation may include, but is not limited to: introductory presentations, facility tours, equipment demonstrations, parent/Athlete meetings, meetings with colleagues and supervisors, orientation manuals, orientation sessions, and increased supervision during initial tasks or initial period of engagement.
22. Training may include, but is not limited to: certification courses, online learning, mentoring, workshop sessions, webinars, on-site demonstrations, and peer feedback.
23. At the conclusion of orientation and training, the individual will be required to acknowledge, in written form, that they have received and completed the orientation and training.
24. Monitoring may include but is not limited to: written or oral reports, observations, tracking, electronic surveillance (e.g., facility security cameras), and site visits.

**How to Obtain an E-PIC or VSC**

25. Golf Ontario has joined the Coaching Association of Canada's Responsible Coaching Movement and therefore has access to the E-PIC at a discounted rate. Participants can obtain an E-PIC via [https://www.sterlingtalentsolutions.ca/landing-pages/c/cac\\_ace/](https://www.sterlingtalentsolutions.ca/landing-pages/c/cac_ace/)
26. For Ontario the *Police Record Checks Reform Act, 2015* requires the individual to consent in writing before requesting a criminal record check (such as an E-PIC). The Act also requires the individual to consent in writing for any disclosure of the results to the requesting organization.
27. Participants may only obtain a VSC by visiting an RCMP office or police station, submitting two pieces of government-issued identification (one of which must have a photo), and completing any required paperwork. Fees may also be required.
28. Fingerprinting may be required if there is a positive match with the individual's gender and birth date.
29. Golf Ontario understands that they may be required to assist an individual with obtaining a VSC. A Request for VSC may need to be submitted or other documentation may need to be completed that describes the nature of the organization and the individual's role with Vulnerable Participants.

**Screening Procedure**

1. Screening documents must be submitted to the Screening Committee.
2. An individual who refuses or fails to provide the necessary screening documents will be ineligible to volunteer or apply for the position sought. The individual will be informed that their application and/or position will not proceed until such time as the screening documents are submitted.
3. Golf Ontario understands that there may be delays in receiving the results of an E-PIC or a VSC. At the discretion of Golf Ontario, an individual may be permitted to participate in the role during the delay. This permission may be withdrawn at any time and for any reason.
4. Golf Ontario recognizes that different information will be available depending on the type of screening document that the individual has submitted. For example, an E-PIC may show details of a specific offense, or not, and/or a VSC may be returned with specific information or simply a notification indicating 'cleared' or 'not cleared'. The Screening Committee will use its expertise and discretion when making decisions based on the screening documents that have been submitted.

---

**Golf Ontario – Screening Policy**

5. Following the review of the screening documents, the Screening Committee will decide:
  - a) The individual has passed screening and may participate in the desired position;
  - b) The individual has passed screening and may participate in the desired position with conditions;
  - c) The individual has not passed screening and may not participate in the desired position; or
  - d) More information is required from the individual.
6. In making its decision, the Screening Committee will consider the type of offense, date of offense, and relevance of the offense to the position sought.
7. The Screening Committee may decide that an individual has not passed screening if the screening documentation reveals any of the following:
  - a) If imposed in the last ten years:
    - i. Any offense involving the use of a motor vehicle, including but not limited to impaired driving
    - ii. Any offense involving conduct against public morals
    - iii. Any offense involving theft or fraud
    - iv. Any offence involving an offence section
  - b) If imposed at any time:
    - i. Any offense involving a Minor or Minors
    - ii. Any offense of assault, physical or psychological violence
    - iii. Any offense involving trafficking or possession of illegal drugs
    - iv. Any offense involving the possession, distribution, or sale of any child-related pornography
    - v. Any sexual offense

### **Conditions and Monitoring**

Excluding the incidents above which, if revealed, would cause the individual to not pass screening, the Screening Committee may determine that incidents revealed on an individual's screening documents may allow the individual to pass the screening process and participate in a desired position with *conditions* imposed. The Screening Committee shall have the sole and unfettered discretion to apply and remove conditions, determine the length of time for the imposition of conditions, and determine the means by which adherence to conditions may be monitored.

### **Records**

8. All records will be maintained in a confidential manner and will not be disclosed to others except as required by law, for use in legal, quasi-legal, or disciplinary proceedings.
9. The records kept as part of the screening process include but are not limited to:
  - a) An individual's Vulnerable Sector Check
  - b) An individual's E-PIC (for a period of three years)
  - c) An individual's Screening Disclosure Form (for a period of three years)
  - d) An individual's Screening Renewal Form (for a period of one year)
  - e) Records of any conditions attached to an individual's registration by the Screening Committee

**Appendix A – Examples of Screening Requirements Matrix**

Risk Level	Roles	Training Recommended/Required	Screening
Level 1 Low Risk	a) Parents, youth or volunteers acting in non-regular or informal basis	Recommended: <ul style="list-style-type: none"> <li>Respect in Sport for Activity Leaders</li> <li><u>CAC Safe Sport Training</u></li> </ul>	<ul style="list-style-type: none"> <li>Complete an Application Form (<b>Appendix B</b>)</li> <li>Complete a Screening Disclosure Form (<b>Appendix C</b>)</li> <li>Participate in training, orientation, and monitoring as determined by the organization</li> </ul>
Level 2 Medium Risk	a) Athlete support personnel b) Non-coach employees or managers c) Volunteer staff who may drive a Golf Ontario vehicle d) Golf Ontario sport staff including interns and IST support e) Golf Ontario finance and human resources staff f) Directors and members of the work groups g) Golf Ontario senior management staff h) Volunteers and committee members working at Golf Ontario events i) Officials j) 3 <sup>rd</sup> party acting on behalf	Recommended based on role: <ul style="list-style-type: none"> <li>Respect in Sport for Activity Leaders</li> <li>Commit to Kids</li> </ul> Required: <ul style="list-style-type: none"> <li>Respect in Sport Activity Leaders (National Officials)</li> <li>MED Certified (Coaches)</li> <li><u>CAC Safe Sport Training</u></li> </ul>	<ul style="list-style-type: none"> <li>Level 1 Requirements</li> <li>Complete and provide an E- PIC</li> <li>Provide one letter of reference related to the position</li> <li>Provide a driver's abstract, if requested</li> </ul>
Level 3 High Risk	a) Golf Ontario contract coaches b) Full time coaches c) Coaches who travel with Athletes d) Coaches who could be alone with Athletes	Recommended based on role: <ul style="list-style-type: none"> <li>Respect in Sport for Activity Leaders</li> <li>Commit to Kids</li> </ul> Required: <ul style="list-style-type: none"> <li>MED Certified</li> <li><u>CAC Safe Sport Training</u></li> </ul>	<ul style="list-style-type: none"> <li>Level 2 Requirements</li> <li>Provide a VSC</li> <li>A second letter of reference from a sport organization</li> </ul>

**Appendix B – Application Form**

*Note: Participants who are applying to volunteer or work within certain positions with Golf Ontario must complete this Application Form. Participants need to complete an Application Form for each position sought. If the individual is applying for a new position within Golf Ontario, a new Application Form must be submitted.*

**NAME:**

First

Middle

Last

**CURRENT PERMANENT ADDRESS:**

Street

City

Province

Postal

**DATE OF BIRTH:** \_\_\_\_\_ **GENDER IDENTITY:** \_\_\_\_\_  
Month/Day/Year**EMAIL:** \_\_\_\_\_ **PHONE:** \_\_\_\_\_**POSITION SOUGHT:** \_\_\_\_\_

By signing this document below, I agree to adhere to the policies and procedures of Golf Ontario, including but not limited to the *Code of Conduct and Ethics*, *Conflict of Interest Policy*, *Privacy Policy*, and *Screening Policy*. Policies are located at the following link: <https://www.gao.ca/golf-ontario-policies/>

I recognize that I must pass certain screening requirements depending on the position sought, as outlined in the *Screening Policy*, and that the Screening Committee will determine my eligibility to volunteer or work in the position.

**NAME (print):** \_\_\_\_\_**DATE:** \_\_\_\_\_**SIGNATURE:** \_\_\_\_\_

---

**Appendix C – Screening Disclosure Form****NAME:**

First

Middle

Last

**OTHER NAMES YOU HAVE USED:** \_\_\_\_\_**CURRENT PERMANENT ADDRESS:**

Street

City

Province

Postal

**DATE OF BIRTH:** \_\_\_\_\_ **GENDER IDENTITY:** \_\_\_\_\_

Month/Day/Year

**CLUB (if applicable):** \_\_\_\_\_ **EMAIL:** \_\_\_\_\_

*Note: Failure to disclose truthful information below may be considered an intentional omission and the loss of volunteer responsibilities or other privileges*

**1. Have you been convicted of a crime? If so, please complete the following information for each conviction. Attach additional pages as necessary.**

Name or Type of Offense: \_\_\_\_\_

Name and Jurisdiction of Court/Tribunal: \_\_\_\_\_

Year Convicted: \_\_\_\_\_

Penalty or Punishment Imposed: \_\_\_\_\_

Further Explanation: \_\_\_\_\_

**2. Have you ever been disciplined or sanctioned by a sport governing body or by an independent body (e.g., private tribunal, government agency, etc.) or dismissed from a coaching or volunteer position? If so, please complete the following information for each disciplinary action or sanction. Attach additional pages as necessary.**

Name of disciplining or sanctioning body: \_\_\_\_\_

Date of discipline, sanction or dismissal: \_\_\_\_\_

Reasons for discipline, sanction or dismissal: \_\_\_\_\_



Penalty or Punishment Imposed:

\_\_\_\_\_

Further Explanation: \_\_\_\_\_

- 3. Are criminal charges or any other sanctions, including those from a sport body, private tribunal or government agency, currently pending or threatened against you? If so, please complete the following information for each pending charge or sanction. Attach additional pages as necessary.**

Name or Type of Offense: \_\_\_\_\_

Name and Jurisdiction of Court/Tribunal: \_\_\_\_\_

Name of disciplining or sanctioning body: \_\_\_\_\_

Further Explanation: \_\_\_\_\_

- 4. Please disclose any other information that was not listed above (ie. Allegations of wrongdoing, employment terminations for cause, convictions, indictments, etc.).**

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

#### **PRIVACY STATEMENT**

By completing and submitting this Screening Disclosure Form, I consent and authorize Golf Ontario to collect, use and disclose my personal information, including all information provided on the Screening Disclosure Form as well as my Enhanced Police Information Check and/or Vulnerable Sector Check (when permitted by law) for the purposes of screening, implementation of the *Screening Policy*, administering membership services. Golf Ontario does not distribute personal information for commercial purposes.

#### **CERTIFICATION**

I hereby certify that the information contained in this Screening Disclosure Form is accurate, correct, truthful and complete.

I further certify that I will immediately inform Golf Ontario of any changes in circumstances that would alter my original responses to this Screening Disclosure Form. Failure to do so may result in the withdrawal of volunteer responsibilities or other privileges and/or disciplinary action.

**NAME (print):** \_\_\_\_\_

**DATE:** \_\_\_\_\_

**SIGNATURE:** \_\_\_\_\_

---

**Appendix D – Screening Renewal Form****NAME:**\_\_\_\_\_  
First\_\_\_\_\_  
Middle\_\_\_\_\_  
Last**CURRENT PERMANENT ADDRESS:**\_\_\_\_\_  
Street\_\_\_\_\_  
City\_\_\_\_\_  
Province\_\_\_\_\_  
Postal**DATE OF BIRTH:** \_\_\_\_\_

Month/Day/Year

**GENDER IDENTITY:** \_\_\_\_\_**EMAIL:** \_\_\_\_\_**PHONE:** \_\_\_\_\_

By signing this document below, I certify that there have been no changes to my criminal record since I last submitted an Enhanced Police Information Check and/or Vulnerable Sector Check and/or Screening Disclosure Form and/or Driver's Abstract ("Personal Document") to Golf Ontario. I further certify that there are no outstanding charges and warrants, judicial orders, peace bonds, probation or prohibition orders, applicable non-conviction information, allegations of wrongdoing, employment terminations for cause, convictions, or indictment, and there have been no absolute and conditional discharges.

I agree that any Personal Document that I would obtain or submit on the date indicated below would be no different than the last Personal Document that I submitted to Golf Ontario. I understand that if there have been any changes, or if I suspect that there have been any changes, it is my responsibility to obtain and submit a new Personal Document to Golf Ontario's Screening Committee instead of this form.

**I recognize that if there have been changes to the results available from any Personal Document and if I submit this form improperly, then I am subject to disciplinary action and/or the removal of volunteer responsibilities or other privileges at the discretion of the Screening Committee.**

**NAME (print):** \_\_\_\_\_**DATE:** \_\_\_\_\_**SIGNATURE:** \_\_\_\_\_

**Appendix E – Request for Vulnerable Sector Check**

Subject: Vulnerable Sector Check

To Whom It May Concern:

This letter verifies that \_\_\_\_\_ is in the process of becoming a volunteer with Golf Ontario. He/She/They has completed the Golf Ontario volunteer application process however we require that a Criminal Records Check with the Vulnerable Sector screening be completed since the individual will be refereeing at tournaments that involve junior golfers and other vulnerable golfers.

Golf Ontario is the Provincial Sport Organization for golf. We shape lives by leading, creating and promoting positive golf experiences.

Regards,

Human Resources  
Golf Ontario