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 Golf Ontario's screening process is to identify individuals who may pose a risk to Golf Ontario and its Participants in the course of the individual's involvement in such programs, activities and events.

Definitions

2. **Athlete**: an Individual who is an athlete and a Participant and who is subject to the UCCMS and/or to the policies of Golf Ontario.
3. **CEO**: the CEO of Golf Ontario.
4. **Criminal Record Check:** a search of the RCMP Canadian Police Information Centre (CPIC) system for adult convictions; sometimes referred to as a CRC.
5. **Enhanced Police Information Check:** a Criminal Record Check plus a search of Local Police Information, available from Sterling Backcheck; sometimes referred to as an E-PIC.
6. **Local Police Information:** Additional conviction and selected non-conviction information in national and local police data sources which may be relevant to the position sought.
7. **Member Club**: means any Club that pays a membership fee to the Golf Ontario.
8. **Minor**: any Participant who is under the age of majority in the Province of Ontario at the relevant time; in Ontario, every person attains the age of majority and ceases to be a minor on attaining the age of eighteen (18) years. Adults are responsible for knowing the age of a Minor.
9. **Offence:** means a criminal offence for which a pardon or record suspension has not been granted.
10. **Participants**: refers to all categories of individual members and/or registrants defined in the By-laws of Golf Ontario who are subject to the UCCMS and/or to the policies of Golf Ontario, as well as all people employed by, contracted by, or engaged in activities with Golf Ontario including, but not limited to, employees, contractors, Athletes, coaches, instructors, officials, volunteers, managers, administrators, committee members, parents/guardians, spectators, and Golf Ontario's directors and officers.
11. **Screening Committee**: the committee described in section 16 (below).
12. **UCCMS**: Universal Code of Conduct to prevent and address Maltreatment in Sport, as amended from time to time.
13. **Vulnerable Participants**: Persons at increased risk of maltreatment and/or coercion, often due to age, gender, race, poverty, indigeneity, sexual orientation, gender identity or expression, disability,

psychosocial or cognitive ability, and their intersections. Vulnerable Participants include persons who are not able to provide informed consent.

14. **Vulnerable Sector Check:** 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; sometimes referred to as a VSC.

Application of this Policy

15. This Policy applies to each individual whose position with Golf Ontario is, as determined by Golf Ontario in its sole discretion, one of trust or authority which may relate to, at a minimum, finances, supervision, stewardship or Vulnerable Participants.

16. Not all individuals associated with Golf Ontario will be required to obtain a Criminal Record Check, an Enhanced Police Information Check or a Vulnerable Sector Check or submit screening documents because not all positions pose a risk of harm to Golf Ontario, or Participants. Golf Ontario determines, in its sole discretion, which roles will be subject to screening using the following guidelines:

> *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.
>
> *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.
>
> *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 have frequent or unsupervised access to Vulnerable Participants.

Screening Committee

17. The implementation of this Policy is the responsibility of the Screening Committee which is a committee composed of three (3) personnel from Golf Ontario as appointed by the CEO. Golf Ontario will ensure that the members of the Screening Committee possess the requisite skills, knowledge and abilities to accurately screen documents and render decisions under this Policy.

18. 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.

19. 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.

20. 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 relevant position.

21. 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.

22. The Screening Committee may, where appropriate, draw an adverse inference from an individual's failure to provide information or to answer queries.

23. When screening an individual, the Screening Committee shall determine whether there is reason to believe that the individual may pose a risk to Golf Ontario, to a Participant, or to another individual.

24. An individual having been previously penalized for a prior offence shall not prevent the Screening Committee from considering that offence as part of the screening.

25. 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 Participants of Golf Ontario, the Screening Committee shall approve the individual's application, subject to the Screening Committee's right to impose conditions.

26. In the case of a decision denying an application or approving an application with conditions, the decision shall be communicated to the applicant and to the relevant stakeholders of Golf Ontario, which may disseminate the decision as they see fit in order ensure a safe environment at Golf Ontario.

27. 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

28. It is the policy of Golf Ontario that when an individual is first engaged by the organization, that

individual must complete the application, onboarding, and orientation processes; inclusive of any training that is requested as required by Golf Ontario.

a) If an individual subsequently receives a charge, conviction for, or is found guilty of, an offence that individual will report that circumstance immediately to Golf Ontario. Additionally, the individual will inform Golf Ontario of any changes in their circumstance that would alter their original responses during the application, onboarding, and orientation processes.

b) 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 Golf Ontario's Complaints and Discipline Policy.

29. When screening a Minor, Golf Ontario will not require the Minor to obtain a Criminal Record Check or an Enhanced Police Information Check as these background checks are designated for adults. Instead, Golf Ontario will follow internal processes designed for screening individuals in this cohort. Notwithstanding the above, Golf Ontario may ask a Minor to obtain a Criminal Record Check or an Enhanced Police Information Check if the organization suspects the Minor has an adult conviction and therefore has a criminal record. In these circumstances, the organization will be clear in its request that it is not asking for the Minor's *youth record*. Golf Ontario understands that they may not request to see a Minor's youth record.

Renewal

30. Unless the Screening Committee determines, on a case-by-case basis, to modify the submission requirements, individuals who are working with Golf Ontario and are required to complete a background check will require renewal every (3) three years.

31. 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 Golf Ontario or the Screening Committee considers it appropriate to do so (including without limitation because of the passage of time) or if the Screening Committee 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

32. 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.

33. Orientation may include, but is not limited to: introductory presentations, facility tours, equipment

demonstrations, parent/guardian/Athlete meetings, meetings with colleagues and supervisors, orientation manuals, orientation sessions, and increased supervision during initial tasks or initial period of engagement.

34. Training may include, but is not limited to: certification courses, online learning, mentoring, workshop sessions, webinars, on-site demonstrations, and peer feedback.

35. At the conclusion of orientation and training, the individual will be required to confirm training completion, as required.

36. 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 Enhanced Police Information Check or a Vulnerable Sector Check

37. In the Province of Ontario, Golf Ontario understands that the *Police Record Checks Reform Act, 2015* requires that the individual consent in writing before a request is made for a background check (such as a Criminal Record Check or an Enhanced Police Information Check) being made by a police record check provider. The *Police Record Checks Reform Act, 2015* also requires the individual to consent in writing for any disclosure of the results to the requesting organization or to another person or organization the individual specifies.
38. Fingerprinting may be required if there is a positive match with certain information about an individual.

Screening Procedure

39. Screening documents must be submitted to the Screening Committee or delegate.

40. 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.

41. Golf Ontario understands that there may be delays in receiving the results of a Vulnerable Sector Check, a Criminal Record Check or an Enhanced Police Information Check. In extraordinary instances where this delay is due to external factors, at the discretion of Golf Ontario, an individual may be permitted to participate in the role, or in a modified capacity during the delay. This permission must be in writing and may be withdrawn in Golf Ontario's sole discretion at any time and for any reason.

42. The Screening Committee's review of submitted documents will include consideration of the factors set out in Section 43 and Section 44; for greater certainty, the Prohibited Behaviour and the Offences list in

Section 44 are not an exhaustive list of the types of Offences the Committee can take into consideration. Following the review of the screening documents, the Screening Committee will decide if:
a) The individual has passed screening and may participate in the relevant position;
b) The individual has passed screening and may participate in the relevant position with conditions;
c) The individual has not passed screening and may not participate in the relevant position; or
d) More information is required from the individual.

43. If an individual has been convicted for, or found guilty of, an offence, the Screening Committee will consider the type of offence, date of offence and relevance of the offence to the position sought.

44. The Screening Committee may decide that an individual has **not passed screening** if the screening documentation reveals any of the following:
    a) <u>If imposed in the last ten years</u>:
        i. Any offence involving the use of a motor vehicle, including but not limited to impaired driving.
        ii. Any offence involving conduct against public morals.
        iii. Any offence involving theft or fraud.
    b) <u>If imposed at any time</u>:
        i. Any Prohibited Behavior as defined in Section 5 of the UCCMS.
        ii. Any offence involving trafficking or possession of illegal drugs.

Conditions and Monitoring

45. 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 relevant position with *conditions* imposed. The Screening Committee shall have complete and unfettered discretion to determine the means of, and to cause the monitoring of compliance with conditions, to apply and remove conditions, and to determine the length of time for the imposition of conditions.

Records

46. All records will be maintained in a confidential manner in accordance with applicable policies and applicable law and will not be disclosed to others except for use in legal, quasi-legal, or disciplinary proceedings or as required by law.

47. The records kept as part of the screening process include but are not limited to:
    a) An individual's Vulnerable Sector Check, Enhanced Police Information Check, Criminal Record Check, or other documents such as training completion, etc.
    b) An individual's application (as applicable).

c) Records of any conditions attached to an individual's registration by theScreening Committee and matters related thereto.
d) Records of any discipline applied to any individual by Golf Ontario or Member Club, or by another sport organization.

Policy Review

48. Golf Ontario will review this Policy on a bi-annual basis, and updates will reflect current best practices.