



OTTAWA GYMNASTICS CENTRE SCREENING POLICY

Definitions

1. The following terms have these meanings in this Policy:
 - a) “*Criminal Record Check (CRC)*” – A search of adult convictions held within the RCMP National Repository of Criminal Records.
 - b) “*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.
 - c) “*Enhanced Police Information Check (E-PIC)*” – a Criminal Record Check plus a search of Local Police Information, available from a professional background and identity services firm.
 - 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.
 - e) “*Vulnerable Individuals*” – A person under the age of 18 years old and/or a person who, because of age, disability or other circumstance, is in a position of dependence on others or is otherwise at a greater risk than the general population of being harmed by people in positions of trust or authority.

Preamble

2. Screening of personnel and volunteers is an important part of providing a safe sporting environment and has become a common practice among sport organizations that provide programs and services to the community.
3. This Policy is one of several policy tools that the Ottawa Gymnastics Centre (“OGC”) will use to fulfill its commitment to provide a safe environment and to every extent possible protect its members from harm.

Intent

4. The OGC takes its responsibilities to members very seriously and is committed to fulfilling the same. The OGC recognizes the environment has a high percentage of minors, who by that very nature require additional measures to ensure participation in a safe place.

Purpose

5. The purpose of screening is to ensure those working/volunteering within the OGC will have undergone screening in accordance with this Policy to better ensure the safety of all participants.

Policy Statement

6. Not all individuals associated with the OGC will be required to undergo screening through an Enhanced Police Information Check (“E-PIC”), Vulnerable Sector Check (“VSC”) and Screening Disclosure Form, as not all positions have the potential to pose a risk of harm to the OGC or to its members. The OGC will determine, as a matter of policy, which individuals will be subject to screening using the following guidelines (the OGC may vary the guidelines at its discretion):

Level 1 – Low Risk - Individuals 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 Individuals. Examples:

- a) parents, youth, or volunteers who are helping out on a non-regular or informal basis

Level 2 – Medium Risk – Individuals 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 Individuals. Examples:

- a) competition volunteers or those handling >\$1000;
- b) coaches who are typically under the supervision of another coach (e.g. Coaches in Training); or
- c) coaches under 18 years of age.

Level 3 – High Risk – Individuals 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 Individuals. Examples:

- a) non-coach employees;
- b) full and part time coaches;
- c) Board of Directors;
- d) any person appointed to accompany an OGC team to an event or competition whether as a coach, manager, chaperone, driver or official in another role; or
- e) Executive Director;

Human Resources Committee

7. The implementation of this Policy is the responsibility of the Human Resources (“HR”) Committee of the OGC; a committee of at least three people appointed by, and at the sole discretion of, the Board of Directors of the OGC. The Board of Directors of the OGC will ensure that the members appointed to the HR Committee possess the requisite skills, knowledge, and abilities to accurately assess E-PICs, VSCs, and Screening Disclosure Forms and render decisions under this Policy. Quorum for the HR Committee will be three members.
8. The OGC Executive Director is responsible for receiving all E-PICs, VSCs, and Screening Disclosure Forms, completing a preliminary review and determining which individuals need to be forwarded to the HR Committee for review. Based on this secondary review, the HR Committee is responsible for making decisions regarding the appropriateness of individuals filling positions in designated categories within the OGC programs. In carrying out its duties, the HR Committee may consult with independent experts including lawyers, police, risk management consultants, volunteer screening specialists, or any other person deemed necessary.
9. The OGC will not knowingly place in a medium or high risk category an individual who has a conviction for a ‘relevant offence’, as defined in this policy (paragraph 29). However, where the HR Committee is of the opinion that, notwithstanding a conviction for a relevant offence a person can occupy a position in a medium or high risk category without adversely affecting the safety of the OGC, an athlete or member of the OGC, through the imposition of such terms and conditions as are deemed appropriate, the HR Committee may approve a person’s participation in a medium or high risk category.

Screening Requirements

10. The OGC’s screening requirements are to be reviewed annually by the HR Committee and are defined in Appendix A of this policy. It is the OGC’s policy that screening requirements commence when an

individual is first engaged by the OGC, however subsequent requirements are noted below if there are instances of any changes to an individual's circumstances.

- a) if an individual subsequently receives a charge, conviction for, or is found guilty of, an offense they will report this circumstance immediately to the OGC. Additionally, the individual will inform the OGC of any changes in their circumstance that would alter their original responses in their Screening Disclosure Form.
- b) if the OGC 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 OGC's rules and policies for discipline.

Young People

11. The OGC defines a young person as someone who is younger than 18 years old. When screening young people, the OGC will:
 - a) not require the young person to obtain a VSC or E-PIC; and
 - b) in lieu of obtaining a VSC or E-PIC, require the young person to submit up to two (2) additional letters of reference, ensuring:
 - i. the reference has known the young person for at least two (2) years.
 - ii. one of the references is not a family member.
 - iii. references are of 18 years of age or older.

Renewal

12. Unless the HR 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 VSC, are required to submit the documents as follows:
 - a) screening Disclosure Form (Incorporated into the regular application process for membership) every year;
 - b) an E-PIC every three years; and
 - c) a Vulnerable Sector Check once.
13. At any time, including after either the submission of an individual's application or its approval (with or without conditions), the HR Committee may re-open an individual's file for additional screening if it is advised of new information that, in the discretion of the OGC, could affect the assessment of the individual's suitability for participation in the OGC's programs, activities, or with any of its members.

Reference Checks

14. All individuals in paid positions working directly with children as outlined in their job description will undergo the following reference checks and the Executive Director will ensure it has occurred prior to any offer of employment:
 - a) confirmation in writing with Gymnastics Ontario that the individual is a member or registered in good standing; and
 - b) discussion regarding conduct, including any issues, with the individual's previous/ employers or gymnastics organizations. The reference check with previous organizations of the prospective employee, will include a question on ethical behaviour.

Procedure

15. When commencing employment, each person subject to this Policy will obtain and submit, at their own cost, an E-PIC or VSC from their local Police Service, the Screening Disclosure Form and confirmation in writing of good standing from the person's previous organization in the case of a transfer from out of province or country to the OGC. Once employed by the OGC, the cost of the

cyclical re-screening through E-PIC will be covered by the OGC up to the current cost up to the Ottawa Police Service amount.

16. Volunteers will obtain and submit an E-PIC at their own cost, however they will be credited one (1) support hour in the year they submit the request.
17. The E-PIC, VSC, Screening Disclosure Form and written confirmation of good standing, if required, will be submitted to the OGC in an envelope or email marked “Confidential”.
18. Individuals who do not submit an E-PIC, VSC, Screening Disclosure Form and written confirmation of good standing, if required, will receive a notice to this effect and will be informed that their offer of employment will be rescinded if the E-PIC, VSC, Screening Disclosure Form and written confirmation of good standing, if required, is not received prior to the start of their employment with OGC.
19. The Executive Director will receive and perform a preliminary review of all E-PICs, VSCs, Screening Disclosure Forms, and written confirmation of good standing, if required, received and determine whether they reveal a relevant offence and therefore need to be brought to the HR Committee for review.
20. Subsequent to its review of an E-PIC, VSC, Screening Disclosure Form or written confirmation of good standing, if required, the HR Committee, by majority vote, will:
 - a) approve an individual’s participation in a medium or high risk category; or
 - b) deny an individual’s participation in a medium or high risk category; or
 - c) approve an individual’s participation in a medium or high risk category subject to terms and conditions as the HR Committee deems appropriate.
21. If an individual’s E-PIC, VSC, Screening Disclosure Form or written confirmation of good standing, if required, does not reveal a relevant offence, the Executive Director will return to the individual or destroy the original E-PIC, VSC, Screening Disclosure Document or written confirmation of good standing within 60 days. A copy of the screening will be kept in the individual’s employee or volunteer file.
22. If an individual’s E-PIC, VSC, Screening Disclosure Form or written confirmation of good standing, if required, reveals a relevant offence; the HR Committee will render its decision and provide notice of its decision in accordance to paragraph 9. After providing notice, the HR Committee will return or destroy the original E-PIC, VSC, Screening Disclosure Document or written confirmation of good standing.
23. Where the HR Committee denies an individual’s participation in a medium or high risk category or approves an individual’s participation in a medium or high risk category subject to terms and conditions, the reasons for such decision will be provided, in writing, to the individual, and a copy of this decision will be provided to the Board of Directors of the OGC.
24. The decisions of the HR Committee are final and binding and will be effective upon notice being sent to the individual by e-mail to his/her last known email address on record with the OGC.
25. Unless determined otherwise by the HR Committee, nothing in this policy will prevent an individual from re-applying for a staff or volunteer position with the OGC at some point in the future, and submitting a new E-PIC, VSC and Screening Disclosure Form and written confirmation of good standing, if required.

26. E-PICs are valid for a period of three years and Screening Disclosure Forms must be completed on an annual basis. Notwithstanding this, the Executive Director or the HR Committee may request that a staff person or volunteer provide an E-PIC, VSC or Screening Disclosure Form for review and consideration. Such a request will be in writing and will provide the reasons for such a request.
27. Failure to participate in the screening process as outlined in this policy will result in ineligibility of the individual for the staff or volunteer position. The individual will be informed that their application and/or position will not proceed until such time as the screening documents are submitted.

Relevant Offences

28. For the purposes of this Policy, a ‘relevant offence’ includes but is not limited to any of the following examples of offences for which pardons have not been granted:
 - a) if imposed in the last five years:
 - i. any offence involving the use of a motor vehicle, including but not limited to impaired driving; or
 - ii. any violation for trafficking and/or possession of drugs and/or narcotics; or
 - iii. any offence involving conduct against public morals.
 - b) if imposed in the last ten years:
 - i. any crime of violence including but not limited to, all forms of assault; or
 - ii. any offence involving a minor or minors.
 - c) if imposed at any time:
 - i. any offence involving the possession, distribution, or sale of any child-related pornography;
 - ii. any sexual offence involving a minor or minors;
 - iii. any offence involving theft or fraud; or
 - iv. any offense described in the ‘Criminal Convictions’ section of this Policy.

Criminal Convictions

29. An individual’s conviction for any of the following *Criminal Code* offenses may result in expulsion from OGC and/or removal from designated positions, competitions, programs, activities and events upon the sole discretion of OGC’s Board of Directors, including but not limited to:
 - a) any offense of physical or psychological violence;
 - b) any crime of violence including but not limited to, all forms of assault;
 - c) any offense involving trafficking of illegal drugs;
 - d) any offense involving the possession, distribution, or sale of any child-related pornography;
 - e) any sexual offense; and
 - f) any offense involving theft or fraud.

Records

30. All records will be maintained in a confidential manner, such as in an employee file. The HR Committee will not retain copies of E-PICs, VSCs and Screening Disclosure Forms, but may retain written records of communication and with individuals whose E-PICs, VSCs or Screening Disclosure Forms indicate a relevant offence, as well as copies of its decisions and written reasons for decisions.

Review and Approval

31. This policy was approved by the Board of Directors of the OGC on March 24, 2021. This policy is not a static document; it will be reviewed by the Board of Directors of the OGC, with input from the HR Committee, on an annual basis or as required.

Name of applicable Organization: _____

Date of Dismissal: _____

Reason for Dismissal: _____

4. Have you ever been disciplined or sanctioned by an international sport body, by a National sport governing body outside Canada, or by any other body within Canada that governs any sport?

Yes _____ No _____ If yes, please describe below and provide a copy of the decision:

Name of applicable Organization: _____

Date of Discipline or Sanction: _____

Reason for Discipline or Sanction: _____

Certification

The answers on this Form are truthful, accurate and complete.

Signature: _____

Date: _____

OGC Screening Matrix

| | LOW RISK | MEDIUM RISK | | | HIGH RISK | | | | |
|--|---|--|-------------------------------------|-----------------------------|----------------|---|--------------------|--|--------------------|
| | Parent or Volunteers (<\$1000, no direct work with athletes, not at competitions) | Competition volunteers or those handling >\$1000 | Coach in Training or Coach under 18 | Coaches in Training over 18 | Coaching Staff | Non-Coach Employees (e.g. Office Staff) | Board of Directors | OGC Appointed Representatives (e.g. chaperones for travel, etc.) | Executive Director |
| Confirmation of Standing with Gymnastics Ontario | | | ✓ (if applicable) | ✓ (if applicable) | ✓ | | | | |
| Reference from Previous Employer | | | | ✓ | ✓ | ✓ | | | ✓ |
| Two personal references (including previous employer, if applicable) | | | ✓ | | | | | | |
| Screening Disclosure Form (annually) | | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| E-PIC (every 3 years) | | ✓ | | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| Vulnerable Sector Screening (once upon employment) | | | | ✓ | ✓ | ✓ | | ✓ | ✓ |

Notes:

1. There is no requirement for screening for Youth under 18 in volunteer positions, e.g. at Competitions