

1.08 SCREENING POLICY

1. Purpose

- 1.1. Golf Ontario understands that screening employees, contractors and volunteers, including Board members, is a vital part of providing a safe sporting environment. Golf Ontario takes all 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 participants in the course of the individual's involvement in such programs, activities and events.

2. Definitions

- 2.1. The following terms have these meaning in this Policy:
- a. **"GO"** – Golf Ontario
 - b. **"individuals"** means all GO contractors and employees as well as individuals who seek or hold one of the GO positions listed in Appendix A, but does not include individual GO members in their capacity as members.
 - c. **"Police Information Check" / "PIC"** – A search of the RCMP criminal records database to determine whether an individual has a criminal record.
 - d. **"Vulnerable Sector Verification" / "VSV"** – A secondary part of the Police Information Check, for all individuals who are volunteering or employed in a vulnerable sector (such as with minor athletes or persons with a disability), which also searches for the existence of any pardoned sex offences and/or charges.

3. Application of this Policy

- 3.1. The level of screening to which individuals will be subjected (including a PIC or VSV) will depend on the level of risk to GO posed by the individual's role, as not all positions pose the same risk of harm to GO or its participants. GO classifies the risk that individuals pose according to the following guidelines:
- a. **Level 1 – Low Risk to GO** – Individuals involved in low risk positions. Level 1 positions cannot involve: (a) a supervisory role; (b) providing direction to others; (c) financial/cash management; or (d) any access to minors or people with a disability while performing GO functions.
 - b. **Level 2 – Medium Risk to GO** – Individuals involved in medium risk positions. Level 2 positions may involve: (a) a supervisory role; (b) occasionally directing others; (c) financial/cash management (d) individuals acting on behalf of GO who work independently at a third party location; (e) limited access to and/or authority over minors or people with a disability while performing GO functions.
 - c. **Level 3 – High Risk to GO** – Individuals involved in high risk positions that are not in Level 1 or 2. Level 3 positions involve individuals who are in a position of trust and/or authority over minors or people with a disability while performing GO functions.

4. Policy

- 4.1. It is GO's policy that:
- a. **Level 1** individuals will:
 - i) Complete an Application Form or other written submission.
 - ii) Provide references as requested.
 - iii) Provide additional documentation required for the position sought (e.g. Driver Abstract).
 - iv) Participate in orientation and/or training as determined by GO.
 - b. **Level 2** individuals will:
 - i) Complete an Application Form or other written submission.
 - ii) Provide references as requested.
 - iii) Provide additional documentation required for the position sought.
 - iv) Complete and provide a PIC and complete a screening disclosure in subsequent years.
 - v) Participate in orientation and/or training as determined by GO.
 - vi) If nominated for election as a new Board member, complete and provide a PIC prior to election at the Annual General Meeting.
 - c. **Level 3** individuals will:
 - i) Complete an Application Form or other written submission.
 - ii) Provide references as requested.
 - iii) Provide additional documentation required for the position sought.
 - iv) Complete and provide a PIC-VSV and complete a screening disclosure in subsequent years.
 - v) Participate in orientation and/or training as determined by GO.
 - vi) Complete and provide a PIC every five years following the initial PIC-VSV check, or earlier for persons/roles identified as potentially posing the highest risk within Level 3 individuals.
- 4.2. If an individual receives a conviction for, or is found guilty of, an offence, they will report this circumstance immediately to GO's Executive Director and the screening procedure will be followed.
- 4.3. Failure to participate in the screening and screening procedure as outlined in this policy may result in ineligibility of the individual to hold any position with GO.
- 4.4. The Screening Committee, in accordance with the Screening Committee Terms of Reference (refer to Appendix B), is responsible for reviewing all positive PIC-VSV and Screening Disclosure Forms and, based on such review, make recommendation to the Board of Directors regarding the appropriateness of individuals filling positions within GO.
- 4.5. The Screening Committee may, at any time, request that an individual provide a PIC-VSV or Screening Disclosure Form to the Screening Committee for review and consideration.

- 4.6. If an individual provides falsified or misleading information, that individual may be immediately removed from their GO position, and may be declared ineligible to hold any employment or position with GO.
- 4.7. Any decision to terminate the employment of a GO employee under this Policy, or to remove an individual from, or to declare an individual ineligible for, any GO position, shall be made by the Board of directors with the input of the Executive Director and either the Screening Committee or the Human Resources Committee, as applicable. Decisions of the Board of Directors are final and binding and are not appealable.

5. How to Obtain a Police Information Check (PIC) or a Police Information Check with Vulnerable Sector Verification (PIC-VSV)

- 5.1. **Police Information Check (PIC)** – Requests are to be completed on-line through BackCheck, a convenient and confidential criminal records check service. An email will be sent to you from BackCheck, on behalf of Golf Ontario, with instructions on how to proceed.
- 5.2. **Police Information Check with Vulnerable Sector Verification (PIC-VSV)** – Individuals may obtain a PIC-VSV by contacting their local police station and completing the required paperwork (some police forces may have relevant information on their web sites and provide alternative means for submitting an application, such as by mail or online). Fees may also be required and will be reimbursed by GO upon the submission of a legitimate receipt and volunteer expense form. If required, GO will provide a letter confirming the potential position with GO. Fingerprinting may be required if there is a match with the individual's gender and birth date.

6. Screening Procedure

- 6.1. The PIC-VSV screening documents defined in the Policy must be submitted to the GO office in a sealed envelope marked "Confidential":
Golf Ontario
Attention: Human Resources - Screening
P.O. Box 970
Uxbridge, Ontario L9P 1N3
- 6.2. Individuals who do not undertake the screening requirements required by this Policy will receive a notice to that effect and will be informed that their application and/or position will not proceed until such time as the screening requirements are received.
- 6.3. In the case of a positive result, GO's Executive Director will be informed and the Executive Director will contact the individual to determine whether the individual wishes to proceed with the Screening Procedure.

If the individual does not wish to proceed, the individual's application and file will be closed and the PIC-VSV will be destroyed.

If the individual wishes to proceed, the Executive Director, while withholding the name of the individual, will advise the GO President and will appoint a Screening

Committee. The Screening Committee will act in accordance with the Terms of Reference attached as Appendix B.

- 6.4. The Screening Committee will determine whether the PIC-VSV revealed a Relevant Offence as defined in section 7.
- 6.5. If the PIC-VSV does not reveal a Relevant Offence, the Screening Committee, by majority vote, may approve or reject the employment or participation of the individual, which may be subject to terms and conditions as deemed appropriate. If the Screening Committee rejects the employment or participation of the individual, or imposes terms and conditions on such employment or participation, the individual may request that the Screening Committee refer its decision to the Board of Directors. If the individual does not request that the decision of the Screening Committee be referred to the Board of Directors, or if the Screening Committee decides to approve the employment or participation of the individual without terms and conditions, the decision of the Screening Committee is final.
- 6.6. If the PIC-VSV reveals a Relevant Offence, the Screening Committee, by majority vote, will recommend one of the following actions to the Board of Directors for final approval:
 - a. Approve an individual's employment or participation; or
 - b. Deny an individual's employment or participation; or
 - c. Approve an individual's employment or participation subject to certain terms and conditions as the Screening Committee deems appropriate.
- 6.7. Upon being referred a decision of the Screening Committee to reject or approve with terms and conditions the employment or participation of an individual pursuant to section 6.5 above, the Board of Directors shall either approve the decision of the Screening Committee or amend the Screening Committee's decision by either rejecting the employment or participation of the individual or approving such employment or participation, either with or without terms and conditions.
- 6.8. Upon receiving a recommendation of the Screening Committee pursuant to section 6.6 above, the Board of Directors shall either approve the recommendation of the Screening Committee or amend the Screening Committee's recommendation to one of the options set out in section 6.6 above.
- 6.9. Once the Board of Directors has approved or amended the recommendation of the Screening Committee or approved or amended the decision of the Screening Committee, or the Screening Committee's decision has become final, the Executive Director will inform the individual and GO's Human Resources.
- 6.10. All PIC-VSV documents provided to the Executive Director, President, Screening Committee and the Board of Directors must then be returned and/or destroyed.
- 6.11. If an individual's employment or participation is denied, all PIC-VSV documents received by GO's Human Resources will also be destroyed.

7. Offences

- 7.1. For the purposes of this Policy, the following definitions will apply.
- 7.2. An "Offence" is an offence under either federal or provincial law and of which an individual has been convicted and has not received a pardon, but "Offence" does not include municipal by-law violations or any provincial or municipal offences involving motor vehicles which do not relate to the operation of a moving vehicle, such as parking tickets.
- 7.3. A "Relevant Offence" is a more serious Offence, the past commission of which will indicate increased risk to GO, and includes, but is not limited to, any of the following:
- a. If imposed in the last five years:
 - i. Any indictable Offence which does not fall into any of the categories listed below.
 - j. Any Offence involving the use of a motor vehicle, including impaired driving.
 - ii. Any Offence for trafficking and/or possession of drugs and/or narcotics.
 - iii. Any Offence involving a conviction under sections 163 through 172.1 and which does not fall into any of the categories listed below.
 - b. If imposed in the last ten years:
 - i. Any crime of violence, including but not limited to, all forms of assault.
 - ii. Any offence involving any actions taken against 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.
 - iii. Any offence involving breach of trust, impersonation, theft or fraud.

8. Records

- 8.1. All records will be maintained in a confidential manner and will not be disclosed to others except as required by law, or for use in legal, quasi-legal or disciplinary proceeding.

9. Suspension Pending a Hearing

- 9.1. The Executive Director or the Board of Directors may determine that an alleged incident or complaint made about an individual is of such seriousness as to warrant suspension of the individual pending an internal hearing, an internal hearing decision, completion of a police investigation or completion of a criminal process. In the case of an employee, such suspension shall be with pay.

10. Criminal Convictions

- 10.1. An individual's conviction for any of the following *Criminal Code* offences may result in the removal of the individual from GO employment, designated position(s), competitions, programs, activities and events, in the sole discretion of the Board of Directors on the recommendation of the Executive Director, the Human Resources Committee or the Screening Committee:
- a. Any offence of physical or psychological violence.
 - b. Any crime of violence, including but not limited to, all forms of assault.
 - c. Any offence involving trafficking of illegal drugs.
 - d. Any offence involving the possession, distribution, or sale of any child-related pornography.

- e. Any sexual offence.
- f. Any offence involving theft or fraud.

11. Modification of Criteria

- 11.1. GO may revise this Policy at any time as circumstances require.

Appendix A – Screening Levels

<p>Level 1 – Low Risk to Golf Ontario</p> <p>Individuals involved in low risk assignments that are not in a supervisory role, directing others, financial/cash management, or limited access to minors or people with a disability.</p>	<p>Golf Advisory Team Members</p> <p>Event Volunteers</p>
<p>Level 2 – Medium Risk to Golf Ontario</p> <p>Individuals involved in medium risk assignments that may be in a supervisory role, directing others, financial/cash management, individuals acting on behalf of GO who work independently at a third party location, individuals with limited access to minors or people with a disability.</p>	<p>Tournament Officials</p> <p>Course Rating Officials</p> <p>Board of Directors</p> <p>Employees (without access to and/or authority over minors)</p>
<p>Level 3 – High Risk to Golf Ontario</p> <p>Individuals involved in high risk assignments that may occupy positions of trust and/or authority over minors or people with a disability.</p>	<p>Rules Officials</p> <p>Employees (with access to and/or authority over minors)</p> <p>Provincial Coaches</p> <p>Individuals working with Juniors</p> <p>Other individuals as may be determined by the Screening Committee</p>

New positions not specifically listed will be assessed through a risk management process.

Appendix B – Screening Committee Terms of Reference

Composition

The implementation of this policy is the responsibility of the GO Screening Committee, if and when constituted, which is a committee of one (1) to three (3) members appointed by, and at the sole discretion of GO President. The GO President will ensure that the members appointed to the Screening Committee possess the requisite skills, knowledge and abilities to accurately assess PIC-VSV and the Screening Disclosure Form and render decisions under this Policy. The Screening Committee will be led by the Executive Director and may or may not include a member of the Board of Directors. Quorum for the Screening Committee will be three members.

The GO President may, in their sole discretion, remove any member of the Screening Committee. Where a position on the Screening Committee becomes vacant, either because a member has been removed or because a member has resigned, the GO President may, in their sole discretion, appoint a replacement member.

Core Functions

The Screening Committee will carry out its duties, in accordance with the terms of this Policy and in accordance with the Screening Procedure outlined in section 6.

The Screening Committee is responsible for reviewing all positive PIC-VSV and Screening Disclosure Forms and based on such review, making recommendations to the GO Board of Directors regarding the appropriateness of individuals filling positions within GO.

In carrying out its duties, the Screening Committee may consult with independent experts including lawyers, police, risk management consultants, volunteer screening specialists or any other person, provided that any expenditure or costs associated with such consultations shall be approved in advance by the Board of Directors.

The Screening Committee will review all Screening requirements and required documents, and determine whether the individual's PIC or VSV and Screening Disclosure Forms reveal a Relevant Offence.