

Section 9.0 – Screening Policy

9.1 – Definitions for purposes of this Section 9.0

- a. **Criminal Record Check (CRC)**
 - i. A search of the RCMP Canadian Police Information Centre (CPIC) system for adult convictions.
- b. **Local Police Information (LPI)**
 - i. 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)**
 - i. A Criminal Record Check plus a search of local police information, available from SterlingBackcheck.com.
- d. **Vulnerable Sector Check (VSC)**
 - i. 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 Participants**
 - i. 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.

9.2 – Preamble

- a. ACA understands that screening personnel and volunteers is a vital part of providing a safe sporting environment and has become a common practice among sport organizations that provide programs and services to the community.

9.3 – Application of this Policy

- a. This Policy applies to all individuals whose position with ACA is one of trust or authority which may relate to, at a minimum, finances, supervision, or Vulnerable Participants.
- b. Not all individuals associated with ACA will be required to obtain a criminal record check or submit screening documents because not all positions pose a risk of harm to ACA or to its Participants. ACA will determine which individuals will be subject to screening using the following guidelines (ACA may vary the guidelines at its discretion):
 - i. **Level 1 – Low Risk:** Participants involved in low-risk assignments who are not in a supervisory role, not directing others, not involved with financial/cash management, and/or do not have regular access to Vulnerable Participants. Examples: a) Parents, youth, or volunteers who are helping on a non-regular informal basis; or b) Event volunteers;
 - ii. **Level 2 – Medium Risk:** Participants involved in medium-risk assignments who may be in a supervisory role, may direct others, may be involved with financial/cash management, and/or who may have limited access to Vulnerable Participants. Examples: a) Athlete support personnel; or, b) Coaches who are typically under the supervision of another coach; or c) officials; or

- iii. **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 financial/cash management, and who have frequent access to Vulnerable Participants. Examples: a) Licensed Coaches; or, b) Team Managers, Technical Leaders; c) IST and medical personnel; d) High-Performance Directors.

9.4 – Screening Committee

- a. The implementation of this policy is the responsibility of ACA’s Screening Committee which is a committee of either one (1) or three (3) members appointed by the Chief Executive Officer (CEO). The CEO will ensure that the members appointed to the Screening Committee possess the requisite skills, knowledge and abilities to accurately screen documents and render decisions under this Policy.
- b. The Screening Committee will carry out its duties, in accordance with the terms of this policy, independent of the Board of ACA.
- c. 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 ACA. 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.

9.5 – Screening

- a. If an individual subsequently receives a charge, conviction for, or is found guilty of, an offense they will report this circumstance immediately to ACA. Additionally, the individual will inform ACA of any changes in their circumstance that would alter their original responses in their Screening Disclosure Form.
- b. If ACA learns that an individual has provided false, inaccurate, or misleading information, the individual may be removed from their position and may be subject to further discipline in accordance with ACA’s *Complaint Management and Discipline Policy*.

9.6 – Young People

- a. ACA defines a young person as someone who is younger than 18 years old. When screening young people, ACA will:
 - i. Not require the young person to obtain a VSC or E-PIC; and
 - ii. In lieu of obtaining a VSC or E-PIC, require the young person to submit up to two (2) additional letters of reference.
- b. Notwithstanding the above, ACA may ask a young person to obtain a VSC or E-PIC if ACA suspects the young person has an adult conviction and therefore has a *criminal record*. In these circumstances, ACA will be clear in its request that it is not asking for the young person’s *youth record*. ACA understands that it may not request to see a young person’s youth record.

9.7 – Orientation, Training, and Monitoring

- a. The type and amount of orientation, training, and monitoring will be based on the individual's level of risk, at ACA's discretion.
- b. 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.
- c. Training may include, but is not limited to: certification courses, online learning, mentoring, workshop sessions, webinars, on-site demonstrations, and peer feedback.
- d. 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.
- e. Monitoring may include but is not limited to: written or oral reports, observations, tracking, electronic surveillance (e.g., facility security cameras), and site visits.

9.8 – How to Obtain an E-PIC or VSC

- a. A member from the Screening Committee will provide further information to Participant who are required to complete an E-PIC or VSC.
- b. 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.
- c. Fingerprinting may be required if there is a positive match with the individual's gender and birth date.
- d. ACA understands that it may be required to assist an individual with obtaining a VSC. ACA may need to submit a Request for VSC (**Appendix F**) or complete other documentation describing the nature of the organization and the individual's role with vulnerable individuals.

9.9 – Procedure

- a. Screening documents will be sent to the Sr. HR Generalist and Accountant: Melissa Rosling at mrosling@alpinecanada.org.
- b. 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.
- c. ACA understands that there may be delays in receiving the results of an E-PIC or a VSC. At its discretion, ACA may permit the individual to participate in the role during the delay. ACA may withdraw this permission at any time and for any reason.
 - i. ACA 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.
 - ii. Following the review of the screening documents, the Screening Committee will decide:

1. The individual has passed screening and may participate in the desired position;
 2. The individual has passed screening and may participate in the desired position with conditions;
 3. The individual has not passed screening and may not participate in the desired position; or
 4. More information is required from the individual.
- d. 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.
- e. The Screening Committee must decide that an individual has not passed screening if the screening documentation reveals any of the following:
- i. If imposed in the last three years:
 1. Any “criminal” traffic offense involving the use of a motor vehicle, including but not limited to impaired driving;
 2. Any offense for trafficking and/or possession of drugs and/or narcotics; and/or
 3. Any offense involving conduct against public morals.
 - ii. If imposed in the last ten years:
 1. Any crime of violence including but not limited to, all forms of assault; and/or
 2. Any offense involving a Minor or Minors.
 - iii. If imposed at any time:
 1. An individual’s conviction for any of the following *Criminal Code* offenses:
 - i. Any offense of physical or psychological violence;
 - ii. Any crime of violence including but not limited to, all forms of assault;
 - iii. Any offense involving trafficking of illegal drugs;
 - iv. Any offense involving the possession, distribution, or sale of any child-related pornography;
 - v. Any sexual offense; and/or
 - vi. Any offense involving theft or fraud.

9.10 – Conditioning Monitoring

- a. 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 may apply and remove conditions at its discretion and will determine the means by which adherence to conditions may be monitored.

9.11 – Records

- a. 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 proceedings.
- b. The records kept by ACA as part of the screening process include but are not limited to:

- i. An individual's Vulnerable Sector Check;
- ii. An individual's E-PIC (for a period of three years);
- iii. An individual's Screening Disclosure Form (for a period of three years);
- iv. An individual's Screening Renewal Form (for a period of one year);
- v. Records of any conditions attached to an individual's registration by the Screening Committee; and
- vi. Records of any discipline applied to any individual by ACA or by another sport organization.

Note: This policy is available in English and French. Should a dispute arise with the interpretation of the translated policy, the English version of the policy shall prevail.