



SCREENING POLICY

**To be used in conjunction with the terms defined in Definitions Conduct and Definitions Policy.
Additional terms are defined in the UCCMS**

Definitions

1. 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.

Preamble

2. As a member of the Coaching Association of Canada's Responsible Coaching Movement, Golf Canada understands that screening personnel and volunteers is a vital part of providing a safe sport environment and has become a common practice among sport organizations that provide programs and services to the sport community. To that end, Golf Canada ensures that, where necessary, comprehensive background and reference checks, interviews and police information checks are conducted on a regular basis.

Application of this Policy

3. This Policy applies to all individuals whose position with Golf Canada 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 Canada will be required to obtain a criminal record check or submit screening documents because not all positions pose a risk of harm to Golf Canada, or participants. Golf Canada will determine which individuals will be subject to screening using the following guidelines based on the nature of their role with the organization:

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.

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.

Level 3 – High Risk – Organizational 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 (i.e. Billet families including all household members over the age of 18, Athlete Support Personnel who travel with athletes, Athlete Support Personnel who could be alone with athletes, etc.)

Screening Committee

5. The implementation of this policy is the responsibility of the Screening Committee which is a committee

composed of at least two (2) personnel from Golf Canada appointed by the Chief Operating Officer. Golf Canada 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.

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 Canada. 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 Canada, 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 Canada, 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, the decision shall be communicated to the applicant and to the relevant stakeholders of Golf Canada, which may disseminate the decision as they see fit in order to best fulfil the mandate of Golf Canada.
15. A Participant whose screening application has been denied or revoked may not re-apply to participate in the programs or activities of Golf Canada for two (2) years from the date the rejected application was made.

Screening Requirements

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

17. It is the policy of Golf Canada that when an individual is first engaged by the organization:

- a) Level 1 individuals will:
 - i. Complete an Application Form
 - ii. Participate in training, orientation, and monitoring as described in the Screening Requirements Matrix (Appendix A)
 - iii. Provide letter(s) of reference, if requested
 - iv. Provide a driver's abstract, if requested
- b) Level 2 individuals will:
 - i. Complete an Application Form
 - ii. Complete a Screening Disclosure Form (Appendix B)
 - iii. Complete a CRC
 - iv. Participate in training, orientation, and monitoring as described in the Screening Requirements Matrix (Appendix A)
 - v. Provide a driver's abstract, if requested
- c) Level 3 individuals will:
 - i. Complete an Application Form
 - ii. Complete a Screening Disclosure Form (Appendix B)
 - iii. Complete an E-PIC
 - iv. Participate in training, orientation, and monitoring as described in the Screening Requirements Matrix (Appendix A)
 - v. Provide letter(s) of reference, if requested
 - 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 Canada. 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 Canada 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](#).

Minor

18. Golf Canada defines a Minor as someone who is below the age of majority in their province of residence.

When screening a Minor, Golf Canada will:

- a) **Not require** the Minor to obtain a CRC or an E-PIC; and
- b) In lieu of obtaining a CRC or an E-PIC, require the Minor to submit up to two (2) additional letters of reference.

19. Notwithstanding the above, Golf Canada may ask a Minor to obtain a CRC or E-PIC 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 Canada understands that they may not request to see a Minor's youth record.

Renewal

20. Unless the Screening Committee determines, on a case-by-case basis, to modify the submission requirements, individuals who are working with Golf Canada in a Level 2 or Level 3 role are required to submit the documents as follows:
- a) A CRC or E-PIC every (3) three years
 - b) A Screening Disclosure Form every (3) three years
21. 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 Canada, could affect the assessment of the individual's suitability for participation in the programs or activities of Golf Canada, or the individual's interactions with other individuals involved with Golf Canada (as applicable).

Orientation, Training, and Monitoring

22. The type and amount of orientation, training, and monitoring will be based on the individual's level of risk, at the discretion of Golf Canada.
23. 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.
24. Training may include, but is not limited to: certification courses, online learning, mentoring, workshop sessions, webinars, on-site demonstrations, and peer feedback.
25. At the conclusion of orientation and training, the individual will be required to upload their training certificates.
26. Monitoring may include but is not limited to: written or oral reports, observations, tracking, electronic surveillance (e.g., facility security cameras), and site visits.

Obtaining a CRC or an E-PIC

27. In Ontario, Golf Canada understands that the *Police Record Checks Reform Act, 2015* requires the individual to consent in writing before requesting a criminal record check (such as a CRC or an E-PIC). The Act also requires the individual to consent in writing for any disclosure of the results to the requesting organization.

- 28.** In British Columbia, Golf Canada understands that the process for obtaining a Criminal Record Check is different than in other provinces and territories and that sections of this policy relating to obtaining a Criminal Record Check may not apply. In such cases, the Screening Committee will provide Participants with directions pursuant to the following website: <https://www.viasport.ca/free-criminal-records-checks>
- 29.** Fingerprinting may be required if there is a positive match with the individual's gender and birth date.

Screening Procedure

1. Screening documents must be submitted to the Screening Committee, or delegate.
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 Canada understands that there may be delays beyond the individual's scope of control in receiving the results of a CRC or an E-PIC. In extraordinary instances where this delay is due to external factors, at the discretion of Golf Canada, 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. Following the review of the screening documents, the Screening Committee will decide if:
 - 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.
5. If an individual has been convicted for, or found guilty of, an offense, the Screening Committee will consider the type of offense, date of offense, and relevance of the offense to the position sought.
6. 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
 - 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

7. 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 E-PIC
 - b) An individual's Screening Disclosure Form
 - c) Records of any conditions attached to an individual's registration by the Screening Committee
 - d) Records of any discipline applied to any individual by Golf Canada or by a Provincial Golf Association or Member Club, or by another sport organization

Appendix A – Screening Policy Requirements Matrix

Risk Level	Roles (Note Young People Exception Below)	Training Recommended/Required	Screening Based on role
Level 1 Low Risk	<p>a) 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.</p>	<p>Participate in training, orientation, and monitoring as determined by the organization:</p> <ul style="list-style-type: none"> • Respect in Sport for Workplace • Respect in Sport for Parents • CAC Safe Sport Training • DEI Training 	<ul style="list-style-type: none"> • Complete an Application Form • Provide letter(s) of reference, if requested • Provide a driver's abstract, if requested
Level 2 Medium Risk	<p>a) Golf Canada Staff:</p> <ul style="list-style-type: none"> • Heritage Services • Finance • Marketing • Commercial • Golf Services <p>b) Professional Championships Volunteers:</p> <ul style="list-style-type: none"> • Admissions • Player Services • Player Transportation • Player Shuttle • Volunteer Security <p>c) Amateur Championships Volunteers:</p> <ul style="list-style-type: none"> • Host Club Tournament Chairs • Officials/Starters/Scorers <p>d) Volunteers or Golf Canada staff who may drive a Golf Canada owned or rented vehicle</p>	<p>Participate in training, orientation, and monitoring as determined by the organization:</p> <ul style="list-style-type: none"> • Respect in Sport for Workplace • Respect in Sport Activity Leaders • CAC Safe Sport Training • DEI Training 	<ul style="list-style-type: none"> • Complete an Application Form • Complete a Screening Disclosure Form (Appendix B) • Complete a CRC • Provide a driver's abstract, if requested

<p>Level 3 High Risk</p>	<p>a) Billet Families (all household members over 18+):</p> <p>b) Board of Directors</p> <p>c) First Tee Program Leaders</p> <ul style="list-style-type: none"> • Golf Courses <p>d) Golf Canada Staff:</p> <ul style="list-style-type: none"> • Executive Team • Human Resources • Information Technology • Sport • Professional Championships • Athlete Support Personnel • Communications <p>e) Professional Championships Volunteers:</p> <ul style="list-style-type: none"> • Tournament Chairs and Vice Chairs • Special Events • Day Care 	<p>Participate in training, orientation, and monitoring as determined by the organization:</p> <ul style="list-style-type: none"> • Respect in Sport for Workplace • Respect in Sport Activity Leaders • CAC Safe Sport Training • DEI Training 	<ul style="list-style-type: none"> • Complete an Application Form • Complete a Screening Disclosure Form (Appendix B) • Complete an E-PIC • Provide letter(s) of reference, if requested • Provide a driver's abstract, if requested
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Minor

Golf Canada defines a Minor according to the age of majority in their respective province of residence. When screening a Minor, Golf Canada will:

- a) Not require the Minor to obtain a CRC or E-PIC; and
- b) In lieu of obtaining a CRC or E-PIC, require the Minor to submit up to two (2) additional letters of reference.

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: _____

PRIVACY STATEMENT

By completing and submitting this Screening Disclosure Form, I consent and authorize Golf Canada and/or the Provincial Golf Association and/or Member Club 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, and communicating with National Sport Organizations, Provincial/Territorial Sport Organizations, Member Clubs, and other organizations involved in the governance of sport. Golf Canada 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 Canada 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: _____

Name

Signature

Date