



Row Ontario - Screening Policy

Effective date	Oct. 1, 2021
Archived date	
Date last reviewed	Sept. 15, 2021
Scheduled review date	Oct. 2024
Replaces and/or amends	Screening Policy
Approved by and date	RO Board of Directors, Sept. 15, 2021
Appendix(-ces) to this Policy	Appendix A – Screening Requirements Matrix

Preamble

1. Row Ontario understands that screening personnel and volunteers is a vital part of providing a safe sporting environment and has become a common practice amongst sport organizations that provide programs and services to the Canadian sport community, and specifically within rowing organizations.

Application of this Policy

2. This Policy applies to all individuals whose position with Row Ontario is one of trust or authority which may relate to, at a minimum, finances, supervision, or any contact with Vulnerable Individuals.
3. Not all individuals associated with Row Ontario will be required to obtain a criminal record check or submit screening documents because not all positions pose a risk of harm to Row Ontario or participants. Individuals will be subject to the screening requirements described in the Screening Requirements Matrix found in **Appendix A** of this Policy and shall comply with the screening application requirements as detailed therein. Regardless of previous involvement with Row Ontario, should an Individual look to take on a new role at any time that falls in a different category within Appendix A, they will be required to ensure Row Ontario is provided with any new screening documents associated with that new role. For any information on how to obtain a Police Record Check, please consult the Row Ontario Safe Sport webpage.

Screening Committee

4. The implementation of this Policy is the responsibility of an independent individual appointed by Row Ontario that will function as the Screening Committee for all screening applications received pursuant to this Policy. This independent individual (hereinafter referred to as the “Screening Committee”) will possess the requisite skills, knowledge, and abilities to accurately assess screening documents and to render decisions under this Policy.
5. The Screening Committee will carry out its duties in accordance with the terms of this Policy.

6. The Screening Committee is responsible for reviewing all documents submitted with a screening application and, based on the review, making decisions regarding the related appropriateness of individuals filling positions within Row Ontario. 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 all documents are maintained strictly confidential.

Screening Requirements

7. A Screening Requirements Matrix is provided as **Appendix A**. All individuals must comply with the requirements detailed therein associated with the highest role they are interested in attaining when first engaged by Row Ontario and shall respect the renewal requirements indicated below. Upon this policy becoming effective all current Individuals will be reviewed, and any gaps in Row Ontario's screening records will be addressed within a six-month period.
8. If an individual subsequently receives a charge, conviction for, or is found guilty of an offense they will report this circumstance immediately to Row Ontario. Individuals are required to inform the relevant organization of any changes in their circumstances that would alter their original responses in their Screening Disclosure Form as part of their original Screening Disclosure Form agreement.
9. If Row 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 the *Harassment, Discipline and Complaints Policy*. For any individual employed by Row Ontario providing false or inaccurate information is considered willful misconduct and disobedience that is not trivial which has not been condoned by Row Ontario and may result in termination without notice.

Procedure

10. Individuals must submit current versions of the the screening documents indicated in Appendix A, according to the category in which they fall as designated by the Chief Executive Officer to the Screening Committee. Note for the sake of this policy, current is defined as within six months of the date of submission. For those Individuals requiring Vulnerable Sector Checks, Row Ontario will provide a letter to be able to access a Vulnerable Sector Check for the position sought as required. Any information submitted shall be subject to Row Ontario's Privacy Policy, will only be viewed on a need-to-know basis, and will be protected in accordance with the relevant and applicable privacy legislation.
11. All positions are conditional on both the completion of the indicated screening activities in Appendix A as well as an acceptance of the results of those activities. An individual who refuses or fails to provide the necessary screening documents, or makes an incomplete application, will be ineligible for the position sought. The individual will be informed by the Screening Committee that their application and/or position will not proceed until such time as the screening documents are submitted.
12. Row Ontario understands that there may be delays in receiving the results of a Police Record Check. At its discretion, the organization may permit the individual to participate in the role during the

delay, provided that the individual demonstrates that they have initiated the Police Record Check process. This permission may be withdrawn at any time and for any reason.

13. Row Ontario recognizes that different information will be available depending on the type of screening document that the individual has submitted. For example, some reports may show details of a specific offense, or not, and/or others 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.
14. The Screening Committee will review all screening documents for all Level 1 and Level 2 candidates, including supporting documents and shall make a decision as indicated below. For Level 3 screening applications, the Screening Committee will only review cases where the individual has made a declaration in their declaration form that may impact whether they can participate in the desired position.
15. Following the review of any Level 1 and Level 2 screening applications, the Screening Committee will decide whether:
 - a) The individual has passed screening and may be considered for the desired position;
 - b) The individual has passed screening and may be considered for 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.
16. In making its decision, and where relevant, the Screening Committee will consider all the relevant information from all documents including the type of offense, date of offense, and relevance of the offense to the position sought.
17. The Screening Committee must decide that an individual has not passed screening if the screening documentation reveals any of the following:
 - a) If imposed in the last three years:
 - i. Any offense involving the use of a motor vehicle (including speeding tickets for excessive speeding), including, but not limited to, impaired driving (unless the individual's role does not involve driving)
 - ii. Any offense for trafficking and/or possession of drugs and/or narcotics
 - iii. Any offense 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
 - ii. Any offense involving a minor or minors
 - iii. Any offense involving theft or fraud
 - c) If imposed at any time:
 - i. An individual's conviction for any of the following *Criminal Code* offenses:
 - 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

However, in exceptional circumstances, the Row Ontario Screening Committee may decide that an individual has passed their screening despite the screening documentation revealing any of the above-mentioned conditions, provided that it has obtained the prior approval of the RCA Screening Committee.

Conditions and Monitoring

18. 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.

Young People

19. When screening Minors, Row Ontario will:

- a) Not require the Minor to obtain a Police Record Check and
- b) In lieu of obtaining a Police Record Check, require the Minor to submit up to two (2) additional references.

20. Notwithstanding the above, Row Ontario may ask a Minor to obtain a Police Record 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. Row Ontario understands that they may not request to see a Minor's youth record.

Renewal

21. Unless the Screening Committee determines, on a case-by-case basis, to modify the submission requirements, individuals who are required to submit a Police Record Check, Screening Disclosure Form, or Screening Renewal Form, are required to submit the documents as follows:

- a) A Criminal Record and Judicial Matters Check every three years
- b) A Screening Disclosure Form every three years
- c) A Screening Renewal Form every year
- d) A Vulnerable Sector Check once

22. The Screening Committee may request that an individual provide any of the above documents at any time. Such requests will be in writing and reasons will be provided for the request.

Records

23. 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. This includes protecting all records in accordance with the relevant and applicable privacy legislation.

24. The records kept as part of the screening process include but are not limited to:

- a) Documentation that the Individual's Police Record Check was seen
- b) An individual's Screening Disclosure Form (for a period of three years)
- c) An individual's Screening Renewal Form (for a period of one year)

- d) Records of any conditions attached to an individual's registration by the Screening Committee
- e) Records of any discipline applied to any individual by RCA, Row Ontario, by a Member Organization, or by another sport organization

Records will be securely stored for the duration of the Individual's service to Row Ontario and the three years following that service.

Privacy

- 25. The collection, use and disclosure of any personal information pursuant to this Policy is subject to Row Ontario's Privacy Policy.
- 26. Row Ontario or any of its delegates pursuant to this Policy shall comply with Row Ontario's Privacy Policy in the performance of their services under this Policy.

Definitions of terms used in this policy can be found as a separate document in the Resource Library online on the Row Ontario website.

Appendix A – Screening Requirements Matrix

	Description	Requirements	Examples
Level 1	Individuals who have frequent or unsupervised access to Vulnerable Individuals Individual that holds a decision-making position, involved in high-risk assignments, occupies position of trust and/or authority, has a supervisory role, directs others, or involved with finances.	<ul style="list-style-type: none"> - Complete an Application Form and interview process - Complete a Screening Disclosure Form - Complete and provide a VSC - Provide two references related to the position - Demonstrate understanding thru training, orientation, and monitoring of safe sport policies - Provide a driver's abstract, if requested 	Coaches that could be alone with athletes. Full-time coaches, coaches that travel with athletes. Organizational staff, Case Managers, Executive Board Members

Level 2	Individuals with direct athlete contact, 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	<ul style="list-style-type: none"> - Complete an Application Form and interview process - Complete a Screening Disclosure Form - Complete and provide a Criminal Record and Judicial Matters Check - Provide two references related to the position - Demonstrate understanding thru training, orientation, and monitoring on safe sport policies - Provide a driver's abstract, if requested and relevant to the position 	Coaches, training staff, Athlete support personnel, non-coach employees or volunteers including Athletes in leadership roles. Directors, Umpires, Event organizing committee members
Level 3	Individuals with no direct contact with athletes, 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	<ul style="list-style-type: none"> - Complete an Application Form - Complete a Screening Disclosure Form - Demonstrate understanding thru training, orientation and monitoring of expectations related to safe sport policies. 	Certain staff and certain volunteers such as board members. Parents, youth, or volunteers who are helping out on a non-regular or informal basis