

**SCREENING POLICY**

Effective date	April 1 <sup>st</sup> 2026
Archived date	-
Date last reviewed	March 10 <sup>th</sup> , 2026
Scheduled review date	November 2029
Replaces and/or amends	Screening Policy in force as of Oct 1 <sup>st</sup> , 2021
Approved by and date	Board of Directors, March 10 <sup>th</sup> , 2026
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 clubs and associations.

**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 Vulnerable Participants.
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.

**Screening Delegate**

4. The implementation of this Policy is the responsibility of an impartial individual that will function as the designated screener for all screening applications received pursuant to this Policy. This impartial individual (hereinafter referred to as the “Screening Delegate”) will possess the requisite skills, knowledge and abilities to appropriately assess screening documents and to render decisions under this Policy. They will be responsible for discretion and maintaining the confidentiality required of the role.
5. The Screening Delegate will carry out their duties in accordance with the terms of this Policy.
6. The Screening Delegate 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 Delegate may consult with independent experts including lawyers, police, risk management consultants, volunteer screening specialists, or any other person.

## 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/or at any time a change in position results in a change in level within the matrix. All Individuals shall respect the renewal requirements indicated below.
8. If an Individual subsequently receives a charge, conviction for, or is found guilty of an offence they will report this circumstance immediately to Row Ontario. Additionally, the Individual will inform the relevant organization of any changes in their circumstances that would alter their original responses in their Screening Disclosure Form.
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 *Complaints and Discipline Policy*.

## Procedure

10. Individuals must submit current versions of the screening documents indicated in Appendix A, according to the category in which they fall as designated by Row Ontario, to the Screening Delegate. Note that, for the purpose of this Policy, current is defined as within six months of the date of submission. 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 the matrix 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 Delegate 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 Criminal Record Check. At its discretion, the organization may permit the Individual to participate in the role during the delay, provided that the Individual has submitted proof that they have initiated the application 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. The Screening Delegate will use their expertise and discretion when making decisions based on the screening documents that have been submitted.
14. The Screening Delegate will review all Level 1 and Level 2 screening applications, including any supporting documents and shall make a decision as indicated below. For Level 3 screening applications, the Screening Delegate will only review cases where the Individual has made a declaration in their disclosure 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 Delegate 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 be considered for the desired position; or
  - d) More information is required from the Individual.
  
16. In making its decision, and where relevant, the Screening Delegate will consider the type of offence, date of offence, and relevance of the offence to the position sought.
  
17. The Screening Delegate must decide that an Individual has not passed screening if the screening documentation reveals any of the following:
  - a) If, in the last three years, the Individual has committed:
    - i. Any offence of assault, physical or psychological violence or
    - ii. Any offence involving trafficking and/or possession of drugs and/or narcotics or
    - iii. Any offence involving theft or fraud.
  - b) If the Individual has committed, at any time:
    - i. Any offence involving a Minor or Minors, or
    - ii. Any offence involving the possession, distribution, or sale of any child-related pornography, or
    - iii. Any sexual offence, or
    - iv. Behaviour resulting in any sanctions due to breach of the UCCMS imposed by a Rowing Canada discipline panel, or by Abuse-Free Sport, preventing the Individual from participating in Canadian sport in accordance with the sanction.

Notwithstanding above, the Screening Delegate may also decide that an Individual has either not passed screening, or has passed screening with conditions (e.g., must not drive with other Individuals as passengers) if the screening documentation reveals any offence involving the use of a motor vehicle that constitutes an offence under the *Criminal Code*.

### Conditions and Monitoring

18. Excluding the incidents above which, if revealed, would cause the Individual to not pass screening, the Screening Delegate 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 Delegate may apply and remove conditions at its discretion and will determine the means by which adherence to conditions may be monitored.

### Minors

19. When screening Minors, Row Ontario will:
  - a) Not require the Minor to obtain a Criminal Record Check; and
  - b) In lieu of obtaining a Criminal 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 Criminal Record Check if the organization suspects the Minor has an adult sentence under the *Youth Criminal Justice Act*. 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 Delegate determines, on a case-by-case basis, to modify the submission requirements, Individuals who fall within Level 1,2 or 3, on the Screening Matrix are required to renew their screening by submitting the following documents:
- a) Every Third Year – A Screening Disclosure Form and a current Criminal Record Check
  - b) Annually, in any year when the above is not completed – A Screening Renewal Form
22. The Screening Delegate may request that an Individual provide any of the above documents at any time. Such request 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) That the Individual's Criminal Record check was viewed (for a period of three years)
  - 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 Delegate
  - e) Records of any discipline applied to any Individual by RCA, Row Ontario, by a Member, or by another sport organization

### 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 (i.e., Screening Delegate) shall comply with Row Ontario's Privacy Policy in the performance of their services under this Policy.

### APPENDIX A – SCREENING REQUIREMENTS MATRIX

Organizations should assess the level of risk of every role based on the position of authority that the role puts a person in, the participants over whom they will have authority, and the behaviours expected in the role they will be put in to determine where each position in the organizations falls within the matrix.

<b>Level</b>	<b>Description</b>	<b>Requirements</b>	<b>Examples</b>
<b>Level 1</b>	Individuals who have frequent or unsupervised access to Vulnerable Participants 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"> <li>- Complete an application form and interview process</li> <li>- Complete a Screening Disclosure Form</li> <li>- Provide current CRC*</li> <li>- Provide two references related to the position</li> <li>- Demonstrate safe sport understanding.</li> <li>- Provide a driver's abstract, if relevant to position</li> </ul>	Senior organizational staff; full-time Athlete Support Personnel, Athlete Support Personnel that travel with athletes; Athlete Support Personnel that could be alone with athletes
<b>Level 2</b>	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 Participants	<ul style="list-style-type: none"> <li>- Complete an application form and interview process</li> <li>- Complete a Screening Disclosure Form</li> <li>- Provide current CRC*</li> <li>- Provide two references related to the position</li> <li>- Demonstrate safe sport understanding.</li> <li>- Provide a driver's abstract, if relevant to the position</li> </ul>	Board Officers; management staff; Athlete Support Personnel who are typically under the direct supervision of another Athlete Support Personnel; Officials in leadership roles; Event organizing committee chairs
<b>Level 3</b>	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"> <li>- Complete an Application Form and interview</li> <li>- Complete a Screening Disclosure Form</li> <li>- Be informed any relevant requirements of Protection Policy</li> </ul>	Certain staff and board members, certain volunteers who are not working with Vulnerable Participants. Parents, youth, or volunteers who are helping out on a non-regular or informal basis
<b>Level 4</b>	Individuals who support activities on a one time, or irregular basis. They play an important but supportive role. Removed from interactions with athletes	<ul style="list-style-type: none"> <li>- Full Name &amp; Contact Information provided</li> <li>- Be informed any relevant requirements of Protection Policy</li> </ul>	An event volunteer who offers to help, recruited to pitch in for short specific task. Someone known to the organization who shows up to lend a hand.

Acceptable Criminal Record Checks:

Level 1

If born before March 12, 1994 – Vulnerable Sector Check from police jurisdiction where Individual resides  
If born after March 12, 1994, - Criminal Record Check that includes Judicial Matters under whatever name that is referred to in the jurisdiction the Individual resides. An EPIC by Sterling Backcheck is deemed equivalent.

Level 2

Criminal Record Check that includes Judicial Matters under whatever name that is referred to in the jurisdiction the Individual resides. An EPIC by Sterling Backcheck is deemed equivalent.