



WHEELCHAIR RUGBY CANADA (WRC) Screening Policy

Definitions

1. The following terms have these meanings in this Policy:
 - a) *“Criminal Record Check (CRC)”* – A search of the RCMP Canadian Police Information Centre (CPIC) system for adult convictions
 - b) *“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
 - c) *“Enhanced Police Information Check (E-PIC)”* – a Criminal Record Check plus a search of local police information, available from Sterling Backcheck
 - d) *“Vulnerable Sector Check (VSC)”* – 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 Individuals”* – 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

Preamble

2. WRC 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.

Application of this Policy

3. This Policy applies to all individuals whose position with WRC is one of trust or authority which may relate to, at a minimum, finances, supervision, or Vulnerable Individuals.
4. Not all individuals associated with WRC will be required to obtain a criminal record check or submit screening documents because not all positions pose a risk of harm to WRC or to its participants. WRC will determine which individuals will be subject to screening using the following guidelines (WRC may vary the guidelines at its discretion):

Level 1 Risk – 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. Examples:

- a) Employees or managers
- b) Directors

Level 2 Risk – Individuals 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 Individuals. Examples:

- a) Full time coaches
- b) Coaches who travel with athletes
- c) Coaches who could be alone with athletes
- d) Athlete Support Personnel

Screening Officer

5. The implementation of this policy is the responsibility of WRC's Screening Officer who is appointed by the WRC Board of Directors. WRC will ensure that the Screening Officer possess the requisite skills, knowledge and abilities to accurately screen documents and render decisions under this Policy.
6. The Screening Officer will carry out its duties, in accordance with the terms of this policy, independent of the Board.
7. The Screening Officer is responsible for reviewing all documents submitted and, based on the review, making decisions regarding the appropriateness of individuals filling positions within WRC. In carrying out its duties, the Screening Officer may consult with independent experts including lawyers, police, risk management consultants, volunteer screening specialists, or any other person.
8. Nothing in this Policy restricts or limits the Screening Officer from requesting that the individual attend an interview with the Screening Officer if the Screening Officer considers that an interview is appropriate and necessary to screen the individual's application.
9. Nothing in this Policy restricts or limits the Screening Officer 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.
10. Nothing in this Policy restricts or limits the Screening Officer from requesting further information from the individual on more than one occasion, subject to the individual's right to insist that the Screening Officer make a decision on the basis of the information before it.
11. The Screening Officer may, where appropriate, draw an adverse inference from an individual's failure to provide information or answer queries.
12. When assessing an individual's screening application, the Screening Officer shall determine whether there is reason to believe that the individual may pose a risk to participants in WRC activities.
13. An individual having been previously penalized for a prior offence shall not prevent the Screening Officer from considering that offence as part of the individual's screening application.
14. If the Screening Officer 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 and participants of WRC, the Screening Officer shall approve the individual's application, subject to the Screening Officer's right to impose conditions.
15. In the case of a decision denying an application or approving an application with conditions, a copy of the decision shall be provided to the applicant and to WRC's Board of Directors, which may disseminate the decision as they see fit in order to best fulfil the mandate of WRC.

16. An Individual whose screening application has been denied or revoked may not re-apply to participate in WRC's programs or activities for two (2) years from the date the rejected application was made

Screening Requirements

17. It is WRC's policy that when an individual is first engaged by WRC:

- a) Individuals will:
 - i. Complete an Application Form
 - ii. Complete a Screening Disclosure Form
 - iii. Complete and provide an E-PIC and a VSC
 - iv. Participate in training, orientation, and monitoring as determined by WRC
 - v. Provide a driver's abstract, if requested
- b) If an individual subsequently receives a charge, conviction for, or is found guilty of, an offense they will report this circumstance immediately to the Screening Officer. Additionally, the individual will inform the Screening Officer of any changes in their circumstance that would alter their original responses in their Screening Disclosure Form.
- c) If WRC 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 WRC's *Discipline and Complaints Policy*.

Young People

18. WRC defines a young person as someone who is younger than 18 years old. When screening young people, WRC will:

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

19. Notwithstanding the above, WRC may ask a young person to obtain a VSC or E-PIC if WRC suspects the young person has an adult conviction and therefore has a *criminal record*. In these circumstances, WRC will be clear in its request that it is not asking for the young person's *youth record*. WRC understands that it may not request to see a young person's youth record.

Renewal

20. Unless the Screening Officer determines, on a case-by-case basis, to modify the submission requirements, individuals who are required to submit an E-PIC, Screening Disclosure Form, VSC, or Screening Renewal Form, are required to submit the documents as follows:

- a) An E-PIC every three years
- b) A Screening Disclosure Form every four years
- c) A Screening Renewal Form (**Appendix C**) every year
- d) A Vulnerable Sector Check once

21. The Screening Officer 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.

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 WRC's discretion.

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, using Safe Sport resources.
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 acknowledge, in written form, that they have received and completed the orientation and training.
26. Monitoring may include but is not limited to: written or oral reports, observations and readily available surveillance systems.

How to Obtain an E-PIC or VSC

27. An E-PIC may be obtained online via <http://www.backcheck.net/e-pic.htm>
28. In Ontario, WRC understands that the *Police Record Checks Reform Act, 2015* requires the individual to consent in writing before requesting a criminal record check (such as an E-PIC). The Act also requires the individual to consent in writing for any disclosure of the results to the requesting organization.
29. In BC, the process for obtaining a Criminal Record Check is different than in other provinces and territories and sections of this policy relating to obtaining a Criminal Record Check may not apply. In such cases, the Screening Officer will provide individuals with directions pursuant to the following website: <https://www.viasport.ca/free-criminal-records-checks>
30. Individuals 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.
31. Fingerprinting may be required if there is a positive match with the individual's gender and birth date.
32. WRC understands that it may be required to assist an individual with obtaining a VSC. WRC may need to submit a Request for a VSC (**Appendix D**) or complete other documentation describing the nature of the organization and the individual's role with vulnerable individuals.

Procedure

33. Screening documents must be submitted to the following individual:

The WRC Chief Executive Officer

34. 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.
35. WRC understands that there may be delays in receiving the results of an E-PIC or a VSC. At its discretion, WRC may permit the individual to participate in the role during the delay. WRC may withdraw this permission at any time and for any reason.

36. WRC 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 Officer will use its expertise and discretion when making decisions based on the screening documents that have been submitted.
37. Following the review of the screening documents, the Screening Officer will decide:
- 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.
38. In making its decision, the Screening Officer will consider the type of offense, date of offense, and relevance of the offense to the position sought.
39. The Screening Officer 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 but not limited to impaired driving
 - ii. Any offense for trafficking and/or possession of drugs and/or narcotics
 - iii. Any offense involving conduct against public morals
 - iv. Any offense involving theft or fraud
 - 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
 - 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

Conditions and Monitoring

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

Records

41. 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.
42. The records kept by WRC as part of the screening process include but are not limited to:
- a) An individual's Vulnerable Sector Check
 - b) An individual's E-PIC (for a period of three years)
 - c) An individual's Screening Disclosure Form (for a period of three years)
 - d) An individual's Screening Renewal Form (for a period of one year)

- e) Records of any conditions attached to an individual's registration by the Screening Officer
- f) Records of any discipline applied to any individual by WRC or by another sport organization

Appendix A – Application Form

Note: Individuals who are applying to volunteer or work within certain positions with WRC must complete this Application Form. Individuals need to complete an Application Form once for the position sought.

NAME: _____
First Middle Last

CURRENT PERMANENT ADDRESS:

Street City Province Postal

DATE OF BIRTH: _____ **GENDER IDENTITY:** _____
Month/Day/Year

EMAIL: _____ **PHONE:** _____

POSITION SOUGHT: _____

By signing this document below, I agree to adhere to WRC's policies and procedures, including but not limited to the *Code of Conduct and Ethics*, *Conflict of Interest Policy*, *Privacy Policy*, and *Screening Policy*. WRC's policies are located at the following link: [**WRC to insert website link to policies**]

I recognize that I must pass certain screening requirements depending on the position sought, as outlined in the *Screening Policy*, and that the Screening Officer will determine my eligibility to volunteer or work in the position.

NAME (print): _____ **DATE:** _____

SIGNATURE: _____

Appendix B – Screening Disclosure Form

NAME: _____
First Middle Last

OTHER NAMES YOU HAVE USED: _____

CURRENT PERMANENT ADDRESS:

Street City Province Postal

DATE OF BIRTH: _____ **GENDER IDENTITY:** _____
Month/Day/Year

CLUB (if applicable): _____ **EMAIL:** _____

Note: Failure to disclose truthful information below may be considered an intentional omission and the loss of volunteer responsibilities or other privilege.

1. Do you have a criminal record? If so, please complete the following information for *each conviction*. Attach additional pages as necessary.

Name or Type of Offense: _____

Name and Jurisdiction of Court/Tribunal: _____

Year Convicted: _____

Penalty or Punishment Imposed: _____

Further Explanation: _____

2. Have you ever been disciplined or sanctioned by a sport governing body or by an independent body (e.g., private tribunal, government agency, etc.) or dismissed from a coaching or volunteer position? If so, please complete the following information for each disciplinary action or sanction. 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 WRC 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 WRC's *Screening Policy*, administering membership services, and communicating with National Sport Organizations, Provincial/Territorial Sport Organizations, Sport Clubs, and other organizations involved in the governance of sport. WRC 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 WRC 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: _____

Appendix D – Request for Vulnerable Sector Check

Note: WRC will be required to modify this letter to adhere to any requirements from the VSC provide.

INTRODUCTION

WRC is requesting a Vulnerable Sector Check for _____ [insert individual's full name] who identifies as a _____ [insert gender identity] and who was born on _____ [insert birthdate].

DESCRIPTION OF ORGANIZATION

WRC is the not-for-profit national organization for the sport of wheelchair rugby.

[Insert additional description]

DESCRIPTION OF ROLE

_____ [insert individual's name] will be acting as a _____ [insert individual's role]. In this role, the individual will have access to vulnerable individuals.

[Insert additional information re: type and number of vulnerable individuals, frequency of access, etc.]

CONTACT INFORMATION

If more information is required from WRC, please contact the Screening Officer:

WRC Chief Executive Officer

Signed: _____ Date: _____