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| <b>Policy Title</b>          | Screening Policy   |
| <b>Responsible Committee</b> | Governance & Risk Management                                     |
| <b>Date of Approval</b>      | March 21, 2023   |
| <b>Date of Next Review</b>   | March 2025, or as otherwise determined by the Board of Directors |

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*This Policy has been prepared by Water Polo Canada and is applicable to Water Polo Canada, its members, affiliated organizations, and registrants. This document cannot be modified without consultation with and approval by Water Polo Canada.*

## Policy Statement

Water Polo Canada 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 sport community.

## Definitions

The following terms have these meanings in this Policy:

**“Board”** means the Board of Directors for Water Polo Canada

**“Criminal Record Check”** means a search of the RCMP Canadian Police Information Centre (CPIC) system for adult convictions

**“Date of Approval”** means as stated on Page 1 of the Policy;

**“Enhanced Police Information Check (E-PIC)”** means a Criminal Record Check plus a search of Local Police Information, available from Sterling Backcheck;

**“including”** means including but not limited to;

**“Local Police Information (LPI)”** means additional conviction and selected non-conviction information in national and local police data sources which may be relevant to the position sought;

**“Participant”** refers to any registrant that participates in training or competition hosted by WPC

**“Policy”** means this Screening Policy;

**“PSO”** refers to a Provincial or Territorial Sport Organization that is responsible for the management of water polo within its provincial or territorial boundaries;

**“Responsible Subcommittee”** means as stated on Page 1 of the Policy;

**“Vulnerable Sector Check (VSC)”** means 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; and

**“WPC”** means Water Polo Canada

## Application

1. This Policy applies to all individuals whose position with WPC is one of trust or authority which may relate to, at a minimum, finances, supervision, or Vulnerable Participants.
2. Not all individuals associated with WPC will be required to obtain a Criminal Record Check or submit screening documents because not all positions pose a risk of harm to WPC or Participants. WPC will determine which individuals will be subject to screening using the following guidelines (WPC may vary the guidelines at their discretion):

**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. Examples:

- a) Parents, youth, or volunteers who are helping out on a non-regular or informal basis

**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. Examples:

- a) Athlete support personnel;
- b) Non-coach employees or managers;
- c) Directors;
- d) Coaches who are typically under the supervision of another coach;
- e) Officials.

**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 finances, and who have frequent or unsupervised access to Vulnerable Participants. Examples:

- a) Full time coaches
- b) Coaches and chaperones who travel with Athletes
- c) Coaches who could be alone with Athletes

### **Screening Committee**

3. Screening Committee is appointed by the Chief Executive Officer or as otherwise appointed by the Board at its discretion.
4. The implementation of this policy is the responsibility of the Screening Committee which is a committee composed of one to three (3) members. WPC will ensure that the members appointed to their respective Screening Committees possess the requisite skills, knowledge and abilities to accurately screen documents and render decisions under this Policy.
5. 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 WPC. 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.
6. 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.

7. 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.
8. 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.
9. The Screening Committee may, where appropriate, draw an adverse inference from an individual's failure to provide information or answer queries.
10. 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 WPC or to another individual.
11. 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.
12. 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 WPC, the Screening Committee shall approve the individual's application, subject to the Screening Committee's right to impose conditions.
13. 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 the Board of Directors of WPC, which may disseminate the decision as they see fit in order to best fulfill the mandate of WPC.
14. An individual whose screening application has been denied or revoked may not re-apply to participate in the programs or activities of WPC for two (2) years from the date the rejected application was made.

### **Screening Requirements**

15. A Screening Requirements Matrix is provided as Appendix A.
16. It is the policy of WPC that when an individual is first engaged by the organization:
  - a) Level 1 individuals will:
    - i. Complete an Application Form (Appendix B);
    - ii. Complete a Screening Disclosure Form (Appendix C);
    - iii. Participate in training, orientation, and monitoring as described in the Screening Requirements Matrix (Appendix A).
  - b) Level 2 individuals will:

- i. Complete an Application Form (Appendix B);
  - ii. Complete a Screening Disclosure Form (Appendix C);
  - iii. Complete and provide an E-PIC;
  - iv. Provide one letter of reference related to the position;
  - v. Participate in training, orientation, and monitoring as described in the Screening Requirements Matrix (Appendix A);
  - vi. Provide a driver's abstract, if requested.
- c) Level 3 individuals will:
- i. Complete an Application Form (Appendix B);
  - ii. Complete a Screening Disclosure Form (Appendix C);
  - iii. Complete and provide an E-PIC and a VSC;
  - iv. Provide one letter of reference related to the position;
  - v. Participate in training, orientation, and monitoring as described in the Screening Requirements Matrix (Appendix A);
  - 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 WPC. 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 WPC 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*.

### **Young People**

17. WPC defines a young person as someone who is younger than 18 years old. When screening young people, WPC 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.
18. Notwithstanding the above, WPC may ask a young person to obtain a VSC or E-PIC if the organization suspects the young person 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 young person's youth record. WPC understands that it may not request to see a young person's youth record.

### **Renewal**

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

follows:

- a) An E-PIC every three (3) years;
  - b) A Screening Disclosure Form every three (3) years;
  - c) A Screening Renewal Form (Appendix D) every year;
  - d) A Vulnerable Sector Check once.
20. 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 WPC, could affect the assessment of the individual's suitability for participation in the programs or activities of WPC, or the individual's interactions with other individuals involved with WPC.

### **Orientation, Training, and Monitoring**

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

### **How to Obtain an E-PIC or VSC**

26. An E-PIC may be obtained online via <http://www.backcheck.net/e-pic.htm>
27. 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.
28. Fingerprinting may be required if there is a positive match with the individual's gender and birth date.
29. WPC understands that they may be required to assist an individual with obtaining a VSC. A Request for VSC (Appendix E) may need to be submitted or other documentation may need

to be completed that describes the nature of the organization and the individual's role with Vulnerable Participants.

### **Procedure**

30. Screening documents must be submitted to the Screening Committee.
31. 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.
32. WPC understands that there may be delays in receiving the results of an E-PIC or a VSC. At the discretion of the Chief Executive Officer and President of WPC, 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.
33. WPC 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.
34. Following the review of the screening documents, the Screening Committee 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.
35. 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.
36. The Screening Committee may decide that an individual has not passed screening if the screening documentation reveals any of the following:
  - If imposed in the last ten (10) 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.
  - 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**

37. 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**

38. 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.
39. The records kept 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 (3) years);
  - c) An individual's Screening Disclosure Form (for a period of three (3) years);
  - d) An individual's Screening Renewal Form (for a period of one (1) year);
  - e) Records of any conditions attached to an individual's registration by the Screening Committee;
  - f) Records of any discipline applied to any individual by WPC or by another sport organization.

### **Languages**

This Policy will be provided by WPC in both official languages of Canada.

In this Policy words denoting any gender include all genders and the rest of the sentence is to be construed as if the necessary grammatical changes have been made.

### **Communication**

WPC will ensure a current version of the Policy is publicized on its organization's website within a reasonable time following the Date of Approval.

WPC and its members will use reasonable efforts to ensure that this Policy is communication to those who will be responsible for upholding it as well as those who will be responsible for its implementation.



## **Review and Approval**

This Policy will be effective as of the Date of Approval following approval by the WPC Board of Directors and will be reviewed by the Responsible Subcommittee every two years.

## Appendix A - Screening Requirements Matrix

| Risk Level             | Roles<br>(Note Young People Exception Below)  | Training<br>Recommended/Required  | Screening  |
|------------------------|---|---|--|
| Level 1<br>Low Risk    | Parents, youth or volunteers acting in non-regular or informal basis  | Recommended:<br><ul style="list-style-type: none"> <li>• Respect in Sport for Activity Leaders</li> <li>• Coaching Association of Canada (CAC) Safe Sport Training</li> </ul>   | <ul style="list-style-type: none"> <li>• Complete an Application Form (<b>Appendix B</b>)</li> <li>• Complete a Screening Disclosure Form (<b>Appendix C</b>)</li> <li>• Participate in training, orientation, and monitoring as determined by the organization</li> </ul> |
| Level 2<br>Medium Risk | <ul style="list-style-type: none"> <li>a) Athlete support personnel</li> <li>b) Non-coach employees or managers</li> <li>c) Directors</li> <li>d) Coaches who are typically under supervision of another coach</li> <li>e) Officials</li> </ul> | Recommended based on role:<br><ul style="list-style-type: none"> <li>• Respect in Sport for Activity Leaders</li> <li>• Commit to Kids</li> </ul> Required:<br><ul style="list-style-type: none"> <li>• Respect in Sport for Activity Leaders (National Officials)</li> <li>• MED Certified (Coaches)</li> <li>• CAC Safe Sport Training</li> </ul>                           | <ul style="list-style-type: none"> <li>• Level 1 Requirements</li> <li>• Complete and provide an E-PIC</li> <li>• Provide one letter of reference related to the position</li> <li>• Provide a driver's abstract, if requested</li> </ul>                                  |
| Level 3<br>High Risk   | <ul style="list-style-type: none"> <li>a) Full Time Coaches</li> <li>b) Coaches who travel with Athletes</li> <li>c) Coaches who could be alone with Athletes</li> </ul>  | Recommended based on role:<br><ul style="list-style-type: none"> <li>• Commit to Kids</li> </ul> Required:<br><ul style="list-style-type: none"> <li>• Respect in Sport for Activity Leaders (National Officials)</li> <li>• Making Ethical Decisions (MED) Certified (Coaches)</li> <li>• CAC Safe Sport Training</li> <li>• Police Vulnerable Sector Check (VSC)</li> </ul> | <ul style="list-style-type: none"> <li>• Level 2 Requirements</li> <li>• Provide a VSC</li> <li>• A second letter of reference from a sport organization</li> </ul>  |

### **Young People Exception**

WPC defines a young person as someone who is younger than 18 years old. When screening young people the WPC 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.

Appendix B – Application Form

Note: Participants who are applying to volunteer or work within certain positions with the WPC must complete this Application Form. Participants need to complete an Application Form once for the position sought. If the individual is applying for a new position within the WPC, a new Application Form must be submitted.

NAME:

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First Middle Last

CURRENT PERMANENT ADDRESS:

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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 the policies and procedures of the WPC, including but not limited to the Code of Conduct and Ethics, Conflict of Interest Policy, Privacy Policy, and Screening Policy. Policies are located at the following link:

<https://www.waterpolo.ca/content/policies-and-bylaws>

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

NAME (print): \_\_\_\_\_ DATE: \_\_\_\_\_

SIGNATURE: \_\_\_\_\_

Appendix C – 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 privileges

1. Have you been convicted of a crime? 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:

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Date of discipline, sanction, or dismissal:

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Reasons for discipline, sanction, or dismissal:

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Penalty or Punishment Imposed:

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Further Explanation:

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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:

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Name and Jurisdiction of Court/Tribunal:

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Name of disciplining or sanctioning body:

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Further Explanation:

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**PRIVACY STATEMENT**

By completing and submitting this Screening Disclosure Form, I consent and authorize WPC 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, Clubs, and other organizations involved in the governance of sport. Water Polo 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 WPC 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 – Screening Renewal Form

NAME:

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First Middle Last

CURRENT PERMANENT ADDRESS:

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Street City Province Postal

DATE OF BIRTH: \_\_\_\_\_ GENDER IDENTITY: \_\_\_\_\_  
Month/Day/Year

EMAIL: \_\_\_\_\_ PHONE: \_\_\_\_\_

By signing this document below, I certify that there have been no changes to my criminal record since I last submitted an Enhanced Police Information Check and/or Vulnerable Sector Check and/or Screening Disclosure Form and/or Driver's Abstract ("Personal Document") to WPC. I further certify that there are no outstanding charges and warrants, judicial orders, peace bonds, probation, or prohibition orders, or applicable non-conviction information, and there have been no absolute and conditional discharges.

I agree that any Personal Document that I would obtain or submit on the date indicated below would be no different than the last Personal Document that I submitted to WPC. I understand that if there have been any changes, or if I suspect that there have been any changes, it is my responsibility to obtain and submit a new Personal Document to the Screening Committee instead of this form.

I recognize that if there have been changes to the results available from any Personal Document and if I submit this form improperly, then I am subject to disciplinary action and/or the removal of volunteer responsibilities or other privileges at the discretion of the Screening Committee.

NAME (print): \_\_\_\_\_ DATE: \_\_\_\_\_

SIGNATURE: \_\_\_\_\_

**Appendix E – Orientation and Training Acknowledgement Form**

1. I have the following role(s) with WPC (circle as many as apply):

Parent / Guardian Coach Director / Volunteer / Athlete / Official / Committee Member

2. As an individual affiliated with WPC, I acknowledge I have received completed the following orientation and training:

Name of Training or Orientation:

Instructor:

Date Completed:

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Name of Training or Orientation:

Instructor:

Date Completed:

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Name of Training or Orientation:

Instructor:

Date Completed:

Name

Signature

Date



## Appendix F – Request for Vulnerable Sector Check

*Note: Water Polo Canada must modify this letter to adhere to any requirements from the VSC provider*

### INTRODUCTION

Water Polo Canada (WPC) 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

WPC is a not-for-profit national organization for the sport of water polo in Canada.  
[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 WPC, please contact the Chief Executive Officer of WPC.

Signed: \_\_\_\_\_ Date: \_\_\_\_\_