



## Alberta Golf Screening Policy

# SCREENING POLICY

### *Definitions*

1. The following defined terms appear in this Policy:
  - a. *Enhanced Police Information Check (E-PIC)*
    - i. a Criminal Record Check, (Search of the RCMP Canadian Police Information Centre system for adult convictions), plus
    - ii. a search of Local Police Information (Additional conviction and selected non-conviction information in national and local police data sources which may be relevant to the position sought.)
  - b. *Vulnerable Sector Check (VSC)*
    - i. Enhanced Police Information Check (E-PIC), plus
    - ii. A search of the Pardoned Sex Offender database.

### *Preamble*

2. Alberta Golf understands that screening participants is a vital part of providing an abuse-free sporting environment and has become a common practice among sport organizations that provide programs and services to the sport community.

### *Application of this Policy*

3. This Policy applies to all individuals whose position with Alberta Golf is one of trust or authority which may relate to, at a minimum, finances, supervision, or Vulnerable Participants.
4. Not all individuals associated with Alberta Golf will be required to obtain a criminal record check or submit screening documents because not all positions pose a risk of harm to Alberta Golf, or participants. Alberta Golf will determine which individuals will be subject to screening.

### *Privacy Officer*

5. The implementation of this policy is the responsibility of the Alberta Golf Privacy Officer. Alberta Golf will ensure that the Privacy Officer possesses the requisite



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skills, knowledge and abilities to accurately screen documents and render decisions under this Policy.

6. The Privacy Officer is responsible for reviewing all documents submitted and based on the review, making decisions regarding the appropriateness of individuals filling positions within Alberta Golf. In carrying out its duties, the Privacy Officer may consult with independent experts including lawyers, police, risk management consultants, or volunteer screening specialists.
7. Nothing in this Policy restricts or limits the Privacy Officer from requesting that the individual attend an interview with the Privacy Officer if the Privacy Officer considers that an interview is appropriate and necessary to screen the individual's application.
8. Nothing in this Policy restricts or limits the Privacy Officer from requesting the individual's authorization to contact any professional, sporting or other organization to assess the individual's suitability for the position that they are seeking.
9. Nothing in this Policy restricts or limits the Privacy Officer from requesting further information from the individual on more than one occasion, subject to the individual's right to insist that the Privacy Officer make a decision on the basis of the information before it.
10. The Privacy Officer 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 Privacy Officer shall determine whether there is reason to believe that the individual may pose a risk to Alberta Golf, to a Member, or to another individual.
12. An individual having been previously penalized for a prior offence shall not prevent the Privacy Officer from considering that offence as part of the individual's screening application.
13. If the Privacy 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 of Alberta Golf the Privacy Officer shall



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approve the individual's application, subject to the Privacy Officer's right to impose conditions.

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

### *Screening Requirements*

16. It is the policy of Alberta Golf that when a participant will complete an Application Form, Screening Disclosure Form, Policy Acknowledgement Form as well as all required orientation and training as described in the **Screening Requirements Matrix**.
  - a. If an individual subsequently receives a charge, conviction for, or is found guilty of, an offense they will report this circumstance immediately to Alberta Golf. Additionally, the individual will inform the organization of any changes in their circumstance that would alter their original responses in their Screening Disclosure Form.
  - b. If Alberta Golf 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 *Code of Conduct Policy*.

### *Renewal*

17. Unless the Privacy Officer determines, on a case-by-case basis, to modify the submission requirements, participants are required to submit an application on an annual basis and fulfill all requirements as described in the **Screening Requirements Matrix**.
18. At any time, including after either the submission of an individual's application or its approval (with or without conditions), the Privacy Officer may re-open an individual's file for additional screening if it is advised of new information that,



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in the discretion of Alberta Golf, could affect the assessment of the individual's suitability for participation in the programs or activities of Alberta Golf or the individual's interactions with other individuals involved with Alberta Golf (as applicable).

### *Orientation, Training, and Monitoring*

19. The type and amount of orientation, training, and monitoring will be based on the individual's level of risk, at the discretion of Alberta Golf.
20. 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.
21. Training may include, but is not limited to: certification courses, online learning, mentoring, workshop sessions, webinars, on-site demonstrations, and peer feedback.
22. 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.
23. Monitoring may include but is not limited to: written or oral reports, observations, tracking, electronic surveillance, and site visits.

### *Screening Procedure*

24. Application and screening documents must be submitted to the Privacy Officer.
25. The Privacy Officer will provide instructions to participants who are required to obtain an E-PIC or VSC and Alberta Golf will reimburse participants for associated costs in accordance with expense reimbursement policies.
26. An individual who refuses or fails to provide the necessary screening documents will be ineligible to apply for the position sought. The individual will be informed that their application will not proceed until such time as the screening documents are submitted.
27. Alberta Golf understands that there may be delays in receiving the results of an



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E-PIC or a VSC. At the discretion of the Privacy Officer, 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.

28. Alberta Golf 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 Privacy Officer will use their expertise and discretion when making decisions based on the screening documents submitted.
29. Following the review of the screening documents, the Privacy 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.
30. In making their decision, the Privacy Officer will consider the type of offense, date of offense, and relevance of the offense to the position sought.

### *Conditions and Monitoring*

31. Excluding the incidents above which, if revealed, would cause the individual to not pass screening, the Privacy 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 Privacy Officer 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*

32. 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.



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33. 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 years)
  - c. An individual's Screening Disclosure Form
  - d. Records of any conditions attached to an individual's registration
  - e. Records of any discipline applied to any individual by Alberta Golf or by another sport organization



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### APPENDIX

#### Process for getting an Enhanced Police Information Check (E-PIC)

1. Visit [www.mybackcheck.com](http://www.mybackcheck.com)
2. Register and complete profile
3. Complete all requirements
4. Share results with organization: Alberta Golf Association Headquarters
5. Submit expense report along with invoice for cost of backcheck service

#### Process for getting a Vulnerable Sector Check

1. Contact your local police service. You will be required to provide the police service with the following information:
  - A description of the position
  - The name of the organization staffing the position
  - Details about the children or vulnerable persons (for example age, or other factors that can show how the person is vulnerable)
  - If the position is volunteer, provide a letter from the organization stating the person will not be paid for services or any other personal expenses incurred.
2. Once the police service has determined that the position meets the requirements for a vulnerable sector check, a name-based search will be conducted. In some cases, you will be required to submit fingerprints to confirm your identity. The use of fingerprints ensures the accuracy of the identification process.
3. Once the vulnerable sector check is completed, the police service conducting the vulnerable sector check will send the results to the requesting organization.
4. The [Criminal Records Act](#) requires that vulnerable sector checks be conducted for individual positions. This means that if you are applying for different



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positions that require a vulnerable sector check, you may need to submit fingerprints for each of those individual positions.