

Screening Policy
November 1, 2023

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Definitions

- a) The following defined terms have these meanings in this Policy:
 - a) Athlete An individual who is subject to the policies of Hardwood Hills Nordic Development Centre, and who may also be subject to the policies of Cross Country Ski Ontario, Nordiq Canada and the Universal Code of Conduct to Prevent and Address Maltreatment in Sport ("UCCMS")
 - b) Criminal Record Check (CRC) A search of the RCMP Canadian Police Information Centre (CPIC) system for adult convictions
 - c) Enhanced Police Information Check (E-PIC) a Criminal Record Check plus a search of Local Police Information, available from Sterling Backcheck
 - d) 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
 - e) Minor as defined in the UCCMS and as amended from time by the Sport Dispute Resolution Centre of Canada
 - f) Participants Refers to all categories of individual note: Hardwood Hills Nordic Development Centre to confirm applicable terms in By-laws – e.g., "Members and/or Registrants" as defined in the By-laws of Hardwood Hills Nordic Development Centre, who are subject to the policies of Hardwood Hills Nordic Development Centre, as well as all people employed by, contracted by, or engaged in activities with Hardwood Hills Nordic Development Centre including, but not limited to, employees, contractors, Athletes, coaches, instructors, officials, volunteers, managers, administrators, committee members, parents or guardians, spectators, directors or officers
 - g) 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

Preamble

b) Hardwood Hills Nordic Development Centre 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.

Application of this Policy

- c) This Policy applies to all individuals whose position with Hardwood Hills Nordic Development Centre is one of trust or authority which may relate to, at a minimum, finances, supervision, or Vulnerable Participants.
- d) Not all individuals associated with Hardwood Hills Nordic Development Centre will be required to obtain a criminal record check or submit screening documents because not all positions pose a risk of harm to Hardwood Hills Nordic Development Centre or Participants. Participants will be subject to the screening requirements described in the Screening Requirements Matrix found in **Appendix A** of this Policy.

Screening Committee

- e) The implementation of this policy is the responsibility of the Screening Committee which is a committee composed of either one (1) or three (3) members. Hardwood Hills Nordic Development Centre will ensure that the members appointed to the Screening Committee possess the requisite skills, knowledge and abilities to accurately screen documents and render decisions under this Policy.
- f) 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 Hardwood Hills Nordic Development Centre. 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.
- g) 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.

- h) 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.
- i) 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.
- j) The Screening Committee may, where appropriate, draw an adverse inference from an individual's failure to provide information or answer gueries.
- k) 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 Hardwood Hills Nordic Development Centre or to another individual.
- I) 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.
- m) 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 Hardwood Hills Nordic Development Centre or Participants, the Screening Committee shall approve the individual's application, subject to the Screening Committee's right to impose conditions.
- n) 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 Hardwood Hills Nordic Development Centre. Subject to applicable privacy and/or employment legislation and any related internal policies, Hardwood Hills Nordic Development Centre may disseminate the decision as they see fit in order to best fulfil the mandate of Hardwood Hills Nordic Development Centre.
- o) A Participant whose screening application has been denied or revoked may not re-apply to participate in the programs or activities of Hardwood Hills Nordic Development Centre for two (2) years from the date the rejected application was made.

Screening Requirements

- p) A Screening Requirements Matrix is provided as **Appendix A**.
- q) It is the policy of Hardwood Hills Nordic Development Centre that when an individual is first engaged by the organization:
 - Level 1 individuals will: a)
 - i. 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. Participate in training, orientation, and monitoring as described in the Screening Requirements Matrix (Appendix A)
 - v. 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 character reference from someone without conflict
 - v. Participate in training, orientation, and monitoring as described in the Screening Requirements Matrix (Appendix A)
 - vi. Provide a driver's abstract, if requested
 - If an individual subsequently receives a charge, conviction for, or is found guilty of, d) an offense they will report this circumstance immediately to Hardwood Hills Nordic Development Centre. Additionally, the individual will inform the organization of any changes in their circumstance that would alter their original responses in their Screening Disclosure Form.

If Hardwood Hills Nordic Development Centre learns that an individual has provided e) 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

- r) For the purposes of this Policy, Hardwood Hills Nordic Development Centre defines a young person as someone who is younger than 18 years old. When screening young people, Hardwood Hills Nordic Development Centre will:
 - Not require the young person to obtain a VSC or E-PIC; and a)
 - In lieu of obtaining a VSC or E-PIC, require the young person to submit up to two (2) b) additional letters of reference.
- s) Notwithstanding the above, Hardwood Hills Nordic Development Centre 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. Hardwood Hills Nordic Development Centre understands that they may not request to see a young person's youth record.

Renewal

- t) 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:
 - An E-PIC every three years a)
 - b) A Screening Disclosure Form every three years
 - A Screening Renewal Form (Appendix D) every year c)
 - A Vulnerable Sector Check once d)
- u) 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 Hardwood Hills Nordic Development Centre, could affect the assessment of the individual's suitability for participation in the programs or activities of Hardwood

Hills Nordic Development Centre, or the individual's interactions with other individuals involved with Hardwood Hills Nordic Development Centre.

Orientation, Training, and Monitoring

- v) The type and amount of orientation, training in addition to the training required per the Screening Requirements Matrix (Appendix A), and monitoring will be based on the individual's level of risk, at the discretion of Hardwood Hills Nordic Development Centre.
- w) 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.
- x) Training may include, but is not limited to: certification courses, online learning, mentoring, workshop sessions, webinars, on-site demonstrations, and peer feedback.
- y) 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).
- z) Monitoring may include but is not limited to: written or oral reports, observations, tracking, electronic surveillance (e.g., facility security cameras), and site visits.
- aa) Hardwood Hills Nordic Development Centre will annually ensure that Participants have received up-to-date training. When the training program has been substantially updated to include new information or resources, or if the Participant's certification has expired, the Participant will be required to re-take the training.
- bb) Hardwood Hills Nordic Development Centre will provide annual, up-to-date information on their policies and procedures related to Prohibited Behaviour and Maltreatment. Additional training resources may be provided by Cross Country Ski Ontario, Nordig Canada, the Office of the Sport Integrity Commissioner (OSIC) and/or Abuse-Free Sport.

How to Obtain an E-PIC or VSC

- cc) Information on obtaining an E-PIC can be obtained from the Hardwood Hills Nordic Development Centre SafeSport officer, Jeff Verheyen.
- dd) Hardwood Hills Nordic Development Centre and Participants understand that the requirements and process for obtaining a criminal record check may vary by province. Hardwood Hills Nordic Development Centre and/or the Participant, as the case may be, are responsible for confirming and following the applicable requirements and process in each case.
- ee) Questions concerning a VSC should be directed to the relevant local RCMP office or police service. Fees may also be required.
- ff) Hardwood Hills Nordic Development Centre 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

- gg) Screening documents must be submitted to the Screening Committee.
- hh) 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.
- ii) Hardwood Hills Nordic Development Centre understands that there may be delays in receiving the results of an E-PIC or a VSC. At the discretion of Hardwood Hills Nordic Development Centre, 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.
- ii) Hardwood Hills Nordic Development Centre 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.
- kk) 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.
- II) 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.
- The Screening Committee must decide that an individual has not passed mm) screening if the screening documentation reveals any of the following:
- If imposed in the last three years:
 - Any offense involving the use of a motor vehicle, including but not limited to i. impaired driving
 - Any offense of assault, physical or psychological violence ii.
 - iii. Any offense involving trafficking or possession of illegal drugs
 - Any offense involving conduct against public morals iv.
 - Any offense involving theft or fraud
- If imposed at any time:
 - Any offense involving a Minor or Minors
 - Any offense involving the possession, distribution, or sale of any child-related ii. pornography
 - iii. Any sexual offense

Conditions and Monitoring

nn) 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

- oo) 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.
- pp) 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 (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 Committee
 - f) Records of any discipline applied to any individual by Hardwood Hills Nordic Development Centre or by another sport organization

Privacy

- qq) The collection, use and disclosure of any personal information pursuant to this Policy is subject to Hardwood Hills Nordic Development Centre's usual policies and practices regarding private and/or confidential information.
- rr) Hardwood Hills Nordic Development Centre or any of its delegates pursuant to this Policy (i.e., the Screening Committee) shall comply with Hardwood Hills Nordic Development Centre's usual policies and practices regarding private and/or confidential information.

Appendix A – Screening Requirements Matrix

The roles listed in the matrix are only examples or where individuals could be assessed based on the risk their role might pose. Every club structure is different. Clubs need to consider the roles and associated risk within their own organizations to determine whether an individual requires screening and training and, if so, where an individual falls in the matrix.

Risk Level	Roles	Training Required 1, 2, 3	Screening	Timing
Level 1 Low Risk	Nordiq Canada Race License holders, excluding Associate Race License and Development License holder ¹ Athletes attest to having satisfied training requirements as part of their Nordiq Canada Race License application; clubs should confirm with their athletes that the training is complete.	CAC Safe Sport training, and CAC Understanding the Rule of Two eLearning Module Parents of minor athletes are highly encouraged to take this training.	Participate in training, orientation, and monitoring as determined by the organization	Within 30 days of applying for the Nordiq Canada Race License
a) Anyone other than athletes and minors travelling overnight with a team b) Athlete support personnel (e.g, wax technicians, integrated support team) c) Non-coach contractors, employees and managers with direct athlete contact d) Directors and officers (e.g., Board members) e) Jury members and major officials at		Required for a) to e): CAC Safe Sport training, and CAC Understanding the Rule of Two eLearning Module Required f) coaches: CAC Safe Sport training, and CAC Understanding the Rule of Two eLearning and Module, and Make Ethical Decisions (MED)	 Level 1 Requirements Complete and provide an E-PIC Provide a driver's abstract, if requested 	The earlier of: Prior to their first formal activity in their season Prior to any unsupervised contact with an Athlete For those without direct athlete contact, within four weeks of starting the role

	f)	Nordiq Canada Licensed Coaches who are not identified under Level 3 High Risk	³ Coaches attest to having satisfied training requirements as part of their Nordiq Canada Coach License application; clubs should confirm with their coaches that the training is complete.				
Level 3 High Risk	a) b)	Full Time Coaches Coaches who travel with Athletes Coaches who could be alone with Athletes	Required: CAC Safe Sport training, and CAC Understanding the Rule of Two eLearning Module, and Make Ethical Decisions (MED) Online Evaluation Coaches attest to having satisfied training requirements as part of their Nordiq Canada	•	Level 2 Requirements Provide a VSC A letter of character reference from someone without conflict	The •	Prior to their first formal activity in their season Prior to any unsupervised contact with an Athlete
			Coach License application; clubs should confirm with their coaches that the training is complete.				

Young People

For the purposes of this Policy, Hardwood Hills Nordic Development Centre defines a young person as someone who is younger than 18 years old. When screening young people, Hardwood Hills Nordic Development Centre 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 Hardwood Hills Nordic Development Centre 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 Hardwood Hills Nordic Development Centre, a new Application Form must be submitted.

NAME:				
First	Middle		Last	
CURRENT PERMANENT	ADDRESS:			
Street	City	Province	Postal	
DATE OF BIRTH:	/Day/Year	GENDER IDENTITY:		
EMAIL:		PHONE:		
POSITION SOUGHT:				
procedures of Hardwoo	d Hills Nordic Deve Conflict of Interest F	adhere to the UCCMS and the lopment Centre including but no local policy, and Screening Policy. Polical	ot limited to the <i>Code</i>	
•	ning Policy, and tha	ng requirements depending on t the Screening Committee will on.		
NAME (print):		DATE:		
SIGNATURE:		_		

Appendix C – Screening Disclosure Form

NAME	:			
First		Middle		Last
ОТНЕ	R NAMES YOU HAVE	USED:		
CURRI	ENT PERMANENT AL	DDRESS:		
Street		City	Province	Postal
DATE	OF BIRTH:		GENDER IDENTIT	'Y :
		Month/Day/Yea	ır	
	WOOD HILLS NORDI	C DEVELOPMENT CEN	NTRE (if applicable):	
Note			elow may be considered a ponsibilities or other privile	
еа	ch conviction. Attac		please complete the follo necessary. (IMPORTANT 18)	-
Name	or Type of Offense:			
Name	and Jurisdiction of C	Court/Tribunal:		
Year C	onvicted:			
Penalt	y or Punishment Imp	oosed:		
Furthe	r Explanation:			
in co	dependent body (e.; aching or volunteer	g., private tribunal, go position? If so, please	ed by a sport governing bovernment agency, etc.) on the complete the following tional pages as necessary	or dismissed from a information for each
Name	of disciplining or sar	nctioning body:		
Date o	f discipline, sanction	n or dismissal:		
Reaso	ns for discipline san	ction or dismissal:		

Penalt	or Punishment Imposed:
Furthe	Explanation:
tri co	e criminal charges or any other sanctions, including those from a sport body, private bunal or government agency, currently pending or threatened against you? If so, please mplete the following information for each pending charge or sanction. Attach additional ges as necessary.
Name	or Type of Offense:
Name	and Jurisdiction of Court/Tribunal:
Name	of disciplining or sanctioning body:
Furthe	r Explanation:
PRIVA	CY STATEMENT
Hardwinform Enhand the pu service Organi the go	apleting and submitting this Screening Disclosure Form, I consent and authorize cood Hills Nordic Development Centre to collect, use and disclose my personal ation, including all information provided on the Screening Disclosure Form as well as my seed Police Information Check and/or Vulnerable Sector Check (when permitted by law) for poses of screening, implementation of the <i>Screening Policy</i> , administering membership s, and communicating with National Sport Organizations, Provincial/Territorial Sport zations, Hardwood Hills Nordic Development Centres, and other organizations involved in vernance of sport. Hardwood Hills Nordic Development Centre does not distribute al information for commercial purposes.
CERTIF	ICATION
	y certify that the information contained in this Screening Disclosure Form is accurate, truthful and complete.
change Form.	er certify that I will immediately inform Hardwood Hills Nordic Development Centre of any is in circumstances that would alter my original responses to this Screening Disclosure Failure to do so may result in the withdrawal of volunteer responsibilities or other ges and/or disciplinary action.
NAME	(print): DATE:
SIGNA	TURE:

Appendix D – Screening Renewal Form

NAME:			
First	M	iddle	Last
CURRENT PERMANENT A	ADDRESS:		
Street	City	Province	Postal
DATE OF BIRTH:	Day/Year	GENDER IDENTITY:	
EMAIL:		PHONE:	
and/or Screening Disclos Hills Nordic Development warrants, judicial orders, conviction information, a I agree that any Personal would be no different tha Nordic Development Cen that there have been any Document to the organiz I recognize that if there I Document and if I submi the removal of voluntee	ure Form and/or I t Centre. I further peace bonds, pro and there have be Document that I an the last Person atre. I understand changes, it is my ation's Screening have been change t this form impro	nformation Check and/or Vulner Driver's Abstract ("Personal Docu certify that there are no outstand bation or prohibition orders, or a sen no absolute and conditional downward obtain or submit on the dal Document that I submitted to that if there have been any chan responsibility to obtain and submitted instead of this form. Les to the results available from a perly, then I am subject to discipor other privileges at the discrete	iment") to Hardwood ding charges and applicable non-ischarges. ate indicated below Hardwood Hills ges, or if I suspect mit a new Personal olinary action and/or
Committee. NAME (print):		DATE:	
SIGNATURE:			

Appendix E – Volunteer Orientation and Training Acknowledgement Form

1.	have the following role(s) with Hardwood Hills Nordic Development Centre (circle as many s apply):						
	Parent / Guardian	Coach	Director / Volunteer				
	Athlete	Official	Committee Member				
2.	As an individual affiliated with Hardwood Hills Nordic Development Centre, I acknowledge I have received completed the following orientation and training:						
Na —	me of Training or Orientati	on:					
Ins	tructor:	Date Comp	leted:				
Na	me of Training or Orientati	on:					
Ins	Instructor: Date Completed:						
Na	me of Training or Orientati	on:					
Ins	tructor:	Date Comple	eted:				
Na	me	Signature	Date				

Appendix F – Request For Vulnerable Sector Check

Note: Hardwood Hills Nordic Development Centre must modify this letter to adhere to any requirements from the VSC provider

INTRODUCTION		
Hardwood Hills Nordic Development Centreinsert individual's full name v		
identity and who was born on		
DESCRIPTION OF ORGANIZATION		
Insert description		
DESCRIPTION OF ROLE		
insert individual's name will role. In this role, the individual will have acce	be acting as ass to vulnerable individuals.	insert individual's
Insert additional information re: type and nuretc.	mber of vulnerable individuals	s, frequency of access,
CONTACT INFORMATION		
If more information is required from Hardwo the Screening Committee Chair:	od Hills Nordic Development (Centre, please contact
Insert information for Screening Committee C	Chair	
Signed: Da	ate:	