



SCREENING POLICY

Definitions

1. The following defined 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. **Vulnerable Participant** - Includes minors and vulnerable adults (people who, because of age, disability or other circumstance, are in a position of dependence on others or are otherwise at a greater risk than the general population of being harmed by people in positions of trust or authority)
 - c. **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

2. Football PEI and its Members understand 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

3. This Policy applies to all individuals whose position with Football PEI or a Member is one of trust or authority which may relate to, at a minimum, finances, supervision, or Vulnerable Participants.
4. Not all individuals associated with Football PEI and its Members will be required to obtain a criminal record check or submit screening documents because not all positions pose a risk of harm to Football PEI and its Members, or Participants. Football PEI will determine which individuals will be subject to screening using the following guidelines (Football PEI may vary the guidelines at its discretion):
 - i. Level 1 – Low/Medium Risk – Participants involved in low/medium risk assignments who will not be in a supervisory role, will not direct athletes, and/or will not have limited access to Vulnerable Participants. Examples:
 - a. Parents, youth, or volunteers who are helping out on a non-regular or informal basis
 - b. Non-coach employees or managers
 - c. Directors
 - d. Officials
 - ii. Level 2 – High Risk – Participants involved in high risk assignments who occupy positions of trust and/or authority, have a supervisory role, direct athletes, and who have frequent or unsupervised access to Vulnerable Participants. Examples:
 - a. Full time or part time Coaches
 - b. Coaches who travel with Athletes
 - c. Coaches who could be alone with Athletes

Screening Committee

5. 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. Football PEI 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.
6. 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 Football PEI and its Members. 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.

7. 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.
8. 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.
9. 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 decide on the basis of the information before it.
10. The Screening Committee 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 Screening Committee shall determine whether there is reason to believe that the individual may pose a risk to Football PEI and its Members, or to another individual.
12. 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.
13. 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 Participants of Football PEI and its Members, the Screening Committee shall approve the individual's application, subject to the Screening Committee'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 which may disseminate the decision as they see fit in order to best fulfil the mandate of Football PEI.
15. A Participant whose screening application has been denied or revoked may not re-apply to participate in the programs or activities of Football PEI and its Members for two (2) years from the date the rejected application was made.

Screening Requirements

16. It is the policy of Football PEI and its Members that when an individual is first engaged by the organization:
 - i. Level 1 individuals will:
 - a. Participate in any/all required training, orientation, and/or monitoring conducted by their assigned Football PEI Member.
 - ii. Level 2 individuals will:
 - a. Participate in any/all required training, orientation, and/or monitoring conducted by their assigned Football PEI Member
 - b. Submit a Request for VSC (**Appendix A**) to Football PEI for signature
 - c. Obtain a VSC through the VSC process
 - d. Submit the Record of the VSC
 - e. Renew the VSC process upon expiry



- iii. If an individual subsequently receives a charge, conviction for, or is found guilty of, an offense they will report this circumstance immediately to Football PEI.
- iv. If Football PEI 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. For the purposes of this Policy, Football PEI and its Members defines a young person as someone who is younger than 18 years old. When screening young people, Football PEI and its Members will not require the young person to obtain a VSC.
- 18. Notwithstanding the above, Football PEI and its Members may ask a young person to obtain a VSC 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*. Football PEI and its Members understand that they 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 a VSC, are required to submit the document once every three years.
- 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 Football PEI and its Members, could affect the assessment of the individual's suitability for participation in the programs or activities of Football PEI and its Members, or the individual's interactions with other individuals involved with Football PEI and its Members.

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 Football PEI and its Members.
- 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. 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 a VSC

- 25. Football PEI and its Members understand that they may be required to assist an individual with obtaining a VSC. A Request for VSC (**Appendix A**) 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 Young People and/or Vulnerable Participants.
- 26. 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.



27. Fingerprinting may be required if there is a positive match with the individual's gender and birth date.

Procedure

28. 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.
29. Football PEI and its Members understand that there may be delays in receiving the results of a VSC. At the discretion of Football PEI or a Member, 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.
30. Football PEI and its Members recognize that different information will be available depending on the type of screening document that the individual has submitted. For example, 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.
31. Following the review of the screening documents, the Screening Committee will decide:
- i. The individual has passed screening and may participate in the desired position;
 - ii. The individual has passed screening and may participate in the desired position with conditions;
 - iii. The individual has not passed screening and may not participate in the desired position; or
 - iv. More information is required from the individual.
32. 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.
33. The Screening Committee may decide that an individual has not passed screening if the screening documentation reveals any, but not limited to, of the following:
- i. If imposed in the last three years:
 - a. Any offense involving the use of a motor vehicle, including but not limited to impaired driving
 - b. Any offense of assault, physical or psychological violence
 - c. Any offense involving trafficking or possession of illegal drugs
 - d. Any offense involving conduct against public morals
 - e. Any offense involving theft or fraud
 - ii. If imposed at any time:
 - a. Any offense involving a minor or minors
 - b. Any offense involving the possession, distribution, or sale of any child-related pornography
 - c. Any sexual offense

Conditions and Monitoring

34. If the screening documentation reveals an offense that does not automatically cause the individual to not pass screening (described in the above subsection), 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

35. 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.

36. The records kept as part of the screening process include but are not limited to:
- i. An individual's Vulnerable Sector Check
 - ii. Records of any conditions attached to an individual's registration by the Screening Committee
 - iii. Records of any discipline applied to any individual by Football PEI and its Members, or by another sport organization.



Appendix A – Request For Vulnerable Sector Check

{insert today's date}

To whom it may concern,

This letter is to identify {insert full legal name} is in a volunteer position as a {insert position} with a Football PEI registered team, the {insert Football PEI Member name}.

The person is requesting a **Vulnerable Sector Check** as they will have trust and authority over young people under the age of 18.

Should you have any questions or concerns regarding this letter, please do not hesitate to contact me.

Respectfully,

{Football PEI Authorized Signature}

{Football PEI Authorized Representative Name}

{Football PEI Authorized Representative Email}

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