



TENNIS CANADA SCREENING POLICY

Effective Date: January 22, 2019

Approved by: Board of Tennis Canada

This policy replaces all previously issued Screening policies

POLICY STATEMENT

Tennis Canada is committed to protecting the security, safety, and health of those who are associated with its tournaments, events and activities. This Screening Policy aims to ensure that individuals in positions of responsibility are worthy of the trust they are given and to safeguard the assets and resources of Tennis Canada.

A. SCOPE

Screening is part of the spectrum of practices that an organization can employ to foster a safe sporting and working environment. Tennis Canada's Screening Policy seeks to protect the safety of participants in Tennis Canada programs and preserve a safe and welcoming environment for all while recognizing and respecting the privacy rights and expectations of all participants. The following are Tennis Canada's screening requirements for anyone working at Tennis Canada, or on behalf of Tennis Canada. The policy applies to all Tennis Canada personnel, including employees, students, interns, officials, self-employed independent contractors and members of the Board (together, "Personnel").

Special consideration is paid to those working closely with vulnerable persons, which includes children. A vulnerable person is defined as a person who, because of their age, a disability, or other circumstances, whether temporary or permanent are (a) in a position of dependence on others or (b) otherwise at a greater risk than the general population of being harmed by a person in a position of authority or trust relative to them. In the context of this policy, this principally refers to minors involved in Tennis Canada programs and events.

B. APPLICATION - EVALUATION OF RISK ASSOCIATED WITH A POSITION

Screening is conducted to address risks associated with various factors: access to vulnerable persons, including transportation of these individuals, access to confidential and sensitive information, opportunity to speak on behalf of the organization to media, and with handling of money.

To address specifically the risk associated with access to vulnerable persons, including transportation of these individuals, there are three levels of risk evaluated and the screening requirements increase with the level of risk of the position.

A position is evaluated in terms of risk and when the position is being filled the incumbent is subject to the screening requirements outlined for that level of risk.

Level 1 – low risk

This is the lowest level of risk. These positions do not require unsupervised access or contact with vulnerable persons.

Level 2 – medium risk

These positions require limited contact, in public settings in the presence of other adults, with vulnerable persons.

Level 3 – high risk

These positions require greater contact, supervised or unsupervised, with vulnerable persons, including the supervision of those with contact with vulnerable persons, approving or overseeing policies addressing risks to vulnerable persons., and driving or traveling with vulnerable persons.

Should any position present confusion regarding which level is applicable to that position's responsibilities the safety practices related to the higher level shall apply.

C. POLICY IMPLEMENTATION

1. Process

Every position at Tennis Canada will have a complete and current job description which outlines roles and responsibilities to determine which level of risk is applicable. Most positions will fall under Level 1, unless they work more closely with vulnerable persons, as outlined above.

Personnel covered by this policy are subject to an interview at hiring and are expected to complete the annual Disclosure of Criminal Record (see Appendix). In addition, the following screening steps are required, based on the level or risk identified for the position.

Enhanced Police Information Check (E-PIC): A police check is a search that is used to determine whether an individual has a criminal record. The search can be based on an individual's name and date of birth, or for much greater assurance, it can be based on fingerprints for positive identification. A check is performed against the national repository of criminal record maintained by the Royal Canadian Mounted Police (RCMP), which holds approximately 4.2 million Record. Checks are also in many cases performed against a Canadian police service's local Record. The Enhanced Police Information Check (E-PIC) conducted by Sterling Talent Solutions checks the above databases as well as data in the Local Police Indices.

Vulnerable Sector Check (VSC): A VSC is a specific process that includes a search of the National Repository of Criminal Records in Canada, of local police information within multiple databanks, and of the Pardoned Sex Offender Database. The applicant experience during the VSC process will vary by jurisdiction in terms of cost, wait times, and even whether the police service will agree to conduct the search.

POSITIONS THAT FALL WITHIN THE LEVEL	REQUIRED SCREENING STEPS	TIMING AND FREQUENCY
<p><u>Level 1:</u> All members of Tennis Canada’s Board of Directors</p> <p>All temporary staff, students, interns, officials (unless level of risk is deemed to be 2 or 3)</p>	<p>Enhanced Police Information Check</p> <p>Enhanced Police Information Check</p>	<p>To be completed when joining the Board and every three years thereafter, at the May Board renewal. Completing the check to the satisfaction of Tennis Canada is a condition of Board membership.</p> <p>To be completed when hired by Tennis Canada and every three years thereafter of continuous employment. Completing the check to the satisfaction of Tennis Canada is a condition of being employed.</p>
<p><u>Level 2:</u> All permanent staff, including self-employed independent contractors (unless level of risk is deemed to be 3)</p>	<p>Enhanced Police Information Check</p> <p>Two references</p> <p>Performance Appraisal Process</p>	<p>To be completed when applying to Tennis Canada, and every three years thereafter, as part of the annual performance review process. Completing the check to the satisfaction of Tennis Canada is a condition of being employed.</p> <p>To be completed when applying to Tennis Canada</p> <p>Annually</p>

Notwithstanding, the individual has the responsibility of notifying his/her manager and/or Human Resources of any relevant incident or offence. The individual must immediately inform Tennis Canada of any changes in his/her circumstances that would alter the original responses to the Disclosure of Criminal Record Form. Tennis Canada will immediately review the information and determine what measure, if any, is required.

If an individual changes position, within Tennis Canada, and the new position carries a higher level of risk, additional screening will be required prior to moving to the new position.

3. Ineligible Convictions

As part of the standard recruiting process, the Human Resources Manager will initiate all police checks, including both the Enhanced Police Information Check and the VSC. The results of the police checks are communicated only to the Human Resources Manager who will review the results.

Information provided to the hiring Manager will outline:

- Whether criminal convictions exist for which a pardon has not been granted, and;
- Whether such convictions, or other information contained in a VSC, involve conduct by the individual that is inconsistent with the bona fide requirements of the position in question, as reasonably determined by Tennis Canada

In making its hiring decision, Tennis Canada will consider the following:

- Relationship of the offence(s) to the nature of the position,
- Number and nature of the charges and/or convictions,
- When the offence(s) occurred, and
- What the individual has done since the date of the offence.

If, after the review, Tennis Canada determines that the individual is not an appropriate candidate for the position, Tennis Canada will immediately notify the individual in writing.

D. CONFIDENTIALITY AND SAFEGUARDS

Tennis Canada will provide hiring managers with aggregate data only, confirming that the applicant, staff or consultant assigned to their team has passed the appropriate police check.

Security safeguards are in place to ensure all personal information is protected from theft as well as unauthorized access, disclosure, copying, use or modification thereof. Personal information collected will be stored as long as necessary for Tennis Canada to pursue the purposes set out in this policy and will be destroyed once the information is no longer required for those purposes, to permit the individual to access the information following a decision made by Tennis Canada on the basis of the information, or pursuant to any legal or statutory requirement to preserve the information. Generally, this means that personal information will be destroyed either one year after a decision is made about the individual or after the individual has left his/her position with Tennis Canada, unless there is a legal requirement to retain the information for a longer period of time.

This version supersedes any previous version of this policy.

**APPENDIX
DISCLOSURE OF CRIMINAL RECORD FORM**

We are screening employees, students, interns, officials, self-employed independent contractors, and members of the Tennis Canada Board of Directors to protect the security, safety, and health of those who are associated with its tournaments, events and activities, with special consideration given to vulnerable persons. Some positions may require additional screening, and this is determined based on the level of risk identified with a position. You are required to disclose information, whether in your current name or in a previous name.

Please be advised that your position requires:

- Enhanced Police Information Check Vulnerable Sector Check

Have you ever been convicted of a criminal offence for which you have not received a pardon? If yes, please describe where indicated below.

- Yes I have nothing to disclose

Official Charge(s)/Country	Date of Conviction
Charge _____	Date _____
Charge _____	Date _____
Charge _____	Date _____

Tennis Canada will not use the personal information collected in this screening process for purposes other than the consideration and determination of your suitability for this or other positions with Tennis Canada and to ensure and maintain the safety of program participants, volunteers and staff. The personal information collected in this screening process will be shared with a limited number of Tennis Canada staff who are involved in the screening process and the assessment of your application and will be subject to safeguards consistent with those required by applicable Canadian and provincial privacy legislation. In assessing your application, Tennis Canada may share or collect personal information from a limited number of persons or agencies outside of Tennis Canada. If such consultation is necessary, you will be advised in advance of which other persons or agencies will be contacted.

I hereby acknowledge that the information provided above is accurate to the best of my knowledge.

Current name _____

Signature _____

Previous name(s) _____

Date _____