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POLICY STATEMENT

OTA 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 OTA.

SCOPE

Screening is part of the spectrum of practices that an organization can employ to foster a safe sporting and working environment. OTA's Screening Policy seeks to protect the safety of participants in OTA 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 OTA's screening requirements for anyone working at OTA, or on behalf of OTA. The policy applies to all OTA personnel, including employees, volunteers, students, interns, 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 (refer to definition below).

For greater certainty, this policy shall not apply to employees or volunteers of Tennis Canada who participate in OTA activities (which individuals shall be governed by Tennis Canada's applicable policies).

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.



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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.

RESPONSIBILITY

1. It is the responsibility of the employee and volunteer, to understand and adhere to OTA expectations with respect to screening requirements.
2. It is the responsibility of the OTA President and all supervisors to ensure that the required employee and volunteer identification is provided, screening is completed, and Compliance Declarations where applicable are completed annually.
3. It is the responsibility of the OTA President to periodically review current and new assignments for relevance, value and risk to the OTA.

DEFINITIONS

1. **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) are 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 includes minors involved in OTA programs.
2. **Volunteer** is defined as a person who is recruited directly by the OTA to perform work in an unpaid capacity on an occasional or regular basis. This could be a few days a year to a few days a month or more. For example, this may include but is not limited to: OTA board members or persons helping out at any of the OTA's events (fundraisers, awards dinners, tournaments, etc.).



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In cases of doubt, it is up to the OTA President to determine whether or not an individual is a volunteer, subject to this policy, and, based on the risk to the OTA, apply this policy as appropriate (refer to Table 2).

- 3. Employee/Staff** is defined for purposes of this policy only, as a person in a capacity for which s/he receives remuneration for services rendered. This could include full-time staff, interns, contract staff, part time staff, etc.

Reference Policies

HR1 - Abuse and Harassment

HR2 - Board of Directors' conduct, conflict, confidentiality

HR16 - Team Ontario Traveling Code

PROCEDURE DEVELOPMENT

1. Process

Every position at the OTA 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 (volunteer or employee) and are expected to complete the Annual Compliance Declaration (see Attachment).

Basic screening is always done at hiring time through the use of Interviews (skills, personal characteristics, etc.), reference checks (responses to stress, anger management, etc.), and from a request for specific documents if required (driver's license, birth certificate or passport).

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-



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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.

*** Please note that a record check is only a tool in promoting public safety. A record check is not a "stamp of approval" from a police or third-party service. A "clear" police record is a snapshot in time and not a guarantee of safety.**

¹ Positions that Fall Within the Level	Required Screening Steps	² Timing and Frequency
<p><u>Level 1:</u></p> <p>All members of OTA's Board of Directors</p> <p>All temporary staff, students, interns (unless level of risk is deemed to be 2 or 3)</p>	<p>E-PIC</p> <p>E-PIC</p>	<p>To be completed when joining the Board and every five years thereafter. Completing the check to the satisfaction of OTA is a condition of Board membership.</p> <p>To be completed when hired by OTA and every five years thereafter of continuous employment. Completing the check to the satisfaction of OTA is a condition of being employed</p>

¹ Volunteers used at OTA tournaments or other events but provided by hosting clubs are the responsibility of the host club and should provide whatever screening is required according to their own volunteer policies

² This is OTA's minimum screening frequency. Some organizations who interface with the OTA may require more frequent screening (eg: school boards, Tennis Canada)



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¹Positions that Fall Within the Level	Required Screening Steps	²Timing and Frequency
Casual Volunteers recruited and managed directly by the OTA, who only volunteer a few days a year (unless level of risk is deemed to be 2 or 3)	Interviews, reference checks	To be completed once when hired by OTA. Completing the check to the satisfaction of OTA is a condition of being a volunteer
<u>Level 2:</u> All permanent staff, including self-employed independent contractors (unless level of risk is deemed to be 3)	E-PIC	To be completed when applying to OTA, and every five years thereafter, as part of the annual performance review process. Completing the check to the satisfaction of OTA is a condition of being employed.
<u>Level 3:</u> All Tennis Development Staff and those routinely interfacing with Ontario Schools, running programs, tournaments and tennis events with youth involved. This includes coaches and officials working directly for OTA programs and tournaments that are not already screened under Tennis Canada's policy Any other position that is deemed to be level 3 based on the risks identified,	VSC VSC	To be completed when applying to OTA, and every three years thereafter, as part of the annual performance review process. Employment in these roles is contingent on a clear Vulnerable Sector Check. No access to vulnerable persons before receipt of a clear Vulnerable Sector Check To be completed every three years. Completing the check to the satisfaction of OTA is a



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¹ Positions that Fall Within the Level	Required Screening Steps	² Timing and Frequency
<p>regardless of the employment or volunteer status.</p> <p>For example:</p> <ul style="list-style-type: none"> • all other persons affiliated with junior provincial teams, whether paid or volunteer; • all persons involved in the delivery of junior developmental programs including camps and clinics and; • any persons appointed to accompany an OTA junior team to an event or competition whether as a coach, manager, chaperone or driver. <p>These requirements shall not apply to parents of participating athletes.</p>		condition of fulfilling their role.



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Any individual who has ceased to be employed or contracted by OTA for more than one year is required to complete the applicable level of screening upon applying for re-employment or seeking a new contract.

OTA will pay for all screening checks for its Personnel.

All offers of employment are conditional upon the satisfactory completion of the applicable screening checks, at OTA's expense. All necessary checks will be initiated prior to hiring and completed as quickly as possible. At no time shall a staff or Board member, regardless of their role, be permitted unsupervised contact with a vulnerable person prior to receipt of a clear and current Vulnerable Sector Check.

Only checks conducted through OTA's Enhanced Police Information Check and Vulnerable Sector Check supplier (or that are proven consistent with those checks) at the time of application or offer will be accepted.

2. Ongoing Checks

Based on the schedule outlined above for each group, OTA Administration will initiate the renewal of the checks, as required.

Notwithstanding, the individual has the responsibility of notifying his/her manager and/or OTA Administration of any relevant incident or offence. The individual must immediately inform OTA of any changes in his/her circumstances that would alter the original responses to the Annual Compliance Declaration Form. OTA will immediately review the information and determine what measure, if any, is required.

If an individual changes position, within OTA, 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, OTA Administration 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 OTA Administration and the OTA President.

Information provided will outline:

- Whether criminal convictions exist for which a pardon has not been granted, and;



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- 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 the hiring manager.

In making its hiring decision, the OTA President in consultation with the hiring manager, 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, they determine that the individual is not an appropriate candidate for the position, the hiring manager or OTA President will immediately notify the individual in writing.

CONFIDENTIALITY AND SAFEGUARDS

The OTA President 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 OTA 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 OTA 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 OTA, unless there is a legal requirement to retain the information for a longer period of time.



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ATTACHMENTS

1. Annual Compliance Declaration

APPROVALS

Chair of the Board		Date:
on behalf of the		
Board of Directors		Date: