



<b>Policy Name:</b> <b>SCREENING POLICY</b>		<b>Date of Approval:</b> October 14, 2022	<b>Activation Date:</b> January 1, 2023
<b>Approved By:</b> Gymnastics BC (GymBC) Board of Directors	<b>Version:</b> This policy replaces the Criminal Record Reviews Policy that was approved and activated on October 13, 2017.		
<b>Review Cycle:</b> Reviewed annually by the Governance Committee, the Safety Officer, and the Chief Executive Officer. Recommended amendments to be approved by the Board of Directors.			

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## 1.0 General

Gymnastics BC (GymBC) is required to adhere the Province of British Columbia's Criminal Records Review Program for all of its staff and chooses to apply the Program to its Member Coaches, and Volunteers in Designated Categories.

This is one of several policy tools that GymBC uses to fulfill our ethical, moral and legal responsibility to provide a safe environment and to protect its members from harm. GymBC is responsible to do everything reasonable to provide a safe and secure environment for participants in its programs. GymBC takes very seriously, and is committed to fulfilling the duty of care it owes to its members.

Screening is an important part of providing a safe environment and has become a common practice among organizations in the non-profit sector that provide programs and services to youth in the community.

## 2.0 Definitions and Scope

- 2.1 **Application to Individuals:** GymBC's Screening Policy applies to all of the individuals listed in the screening matrix found in Appendix A and only when they are involved in GymBC Activities, as that term is defined in Section 2.2.
- 2.2 **GymBC Activities** means all events that are sanctioned, sponsored or otherwise supported by GymBC, including but not limited to those ordinarily arising in the course of GymBC's business (whether in person, over the phone or online), such as: competitions, practices, training camps, travel associated with GymBC activities, and meetings. For the purposes of this Policy, "GymBC Activities" also includes other non-GymBC events and circumstances outside of the foregoing, when such conduct adversely affects relationships within GymBC (and its work and sport environment) and/or among its Members or is detrimental to the image and reputation of GymBC. Such applicability will be determined by GymBC, in its sole discretion. Specific examples of GymBC Activities include:
  - 2.2.1 All provincial team training camps, competitions, selection events and other provincial team undertakings;
  - 2.2.2 GymBC member club competitive and recreational programs and services;
  - 2.2.3 Events owned and/or sanctioned by GymBC; involvement in BC Winter/Summer Games, Canada Winter/Summer Games or GymCan and other Canadian Gymnastics hosted and non-hosted competitions or activities;
  - 2.2.4 Travel to and from 2.2.1, 2.2.2, and 2.2.3;
  - 2.2.5 Conferences, workshops, clinics and other branded GymBC events;
  - 2.2.6 Meetings organized by GymBC or meetings at which GymBC staff, coaches, officials, volunteers, and/or others representing the organization are present.
  - 2.2.7 Activities related to the general business of GymBC.
- 2.3 **E-PIC (Enhanced Police Information Check), Criminal Record Check (CRC), or Police Information Check (PIC)**  
The Enhanced Police Information Check (E-PIC), Criminal Record Check (CRC) and Police Information Check (PIC) includes searches of criminal convictions that did not establish a Criminal

Record or that may be in addition to a Criminal Record. These checks also determine active judicial matters such as:

- Pending Criminal Charges
- The Interim Release Conditions
- Arrest Warrants
- Post-Sentencing Outcomes
- Terms of Probation
- Non-Conviction Outcomes
- Conditional Discharges

**2.4 VSC (Vulnerable Sector Check):** A vulnerable sector check is a police information check plus a check to see if a person has a record suspension (pardon) for sexual offences. Vulnerable sector checks were created to protect children and vulnerable persons and are governed by the Criminal Records Act.

## **2.5 Screening Process**

**2.5.1** The implementation of this policy is the responsibility of GymBC staff members (CEO or designate, e.g., Safety Officer) for all screening applications that must be submitted pursuant to this Policy. The GymBC staff members will possess the requisite skills, knowledge and abilities to accurately assess screening documents and to render decisions under this Policy.

**2.5.2** The GymBC staff members will carry out their duties in accordance with the terms of this Policy.

**2.5.3** The GymBC staff members are responsible for reviewing all documents submitted and, based on their review, making decisions regarding the appropriateness of individuals fulfilling positions or roles with GymBC or receiving accreditation for GymBC activities. In carrying out its duties, the GymBC staff members may consult with independent experts including lawyers, police, risk management consultants, volunteer screening specialists, or any other person.

## **3.0 Screening Requirements**

A Screening Requirements Matrix is provided as Appendix A. Each position in GymBC will be assigned a risk assessment level by the Chief Executive Officer or their designate. The risk assessment level is noted in Appendix A.

It is the policy of GymBC that when an individual is engaged by the organization, the minimum criteria outlined in section are met:

**3.1 Screening Risk Levels and Requirements:** Individuals associated with GymBC will be required to complete screening measures based on the risk level associated with their roles or responsibilities in the organization. GymBC will determine which individuals are subject to specific screening measures using the following guidelines. The guidelines detailed below may be altered at the discretion of GymBC. The roles, screening, and training requirements for each risk level are stated in Appendix A.

**3.1.1 Level 1 – Low Risk:** Consists of individuals involved in low-risk assignments who are not in a supervisory role, not directing others, not involved with finances, and/or do not have

unsupervised access to Vulnerable Individuals. This includes but is not limited to: volunteers, subject matter experts (presenters) or Integrated Support Team members who assist on a non-regular or informal basis. Provincial Team and High-Performance athletes attending GymBC activities also fall into the low-risk category.

- 3.1.2 Level 2 – Medium Risk:** Consists of individuals involved in medium-risk assignments who may be in a supervisory role, may direct others, may be involved with finances, and/or who may have limited access to Vulnerable Individuals. This includes but is not limited to: Judges, GymBC staff (Administrative), and support personnel who do not hold roles or responsibilities considered as Level 3.
  - 3.1.3 Level 3 – Increased Risk:** Consists of individuals involved in higher-risk assignments who occupy positions of trust and/or authority, have a supervisory role, direct others, are involved with finances, and/or who have frequent or unsupervised access to Vulnerable Individuals. This includes but is not limited to: GymBC Board of Directors, GymBC staff (Technical and Operations), all Coaches, Integrated Support Team members, and other roles as determined by GymBC in its sole discretion.
- 3.2 Criminal Record Checks for Minors** For the purpose of this policy, GymBC defines a young person as someone who is younger than 19 years old (legally a minor in BC). When conducting screening measures for young people, GymBC will:
- 3.2.1** Not require the minor to obtain a Vulnerable Sector Check (VSC) or Criminal Record Check of any kind; and,
  - 3.2.2** In lieu of obtaining a VSC or Criminal Record Check, reserves the right to request a young person who occupying roles such as coach, volunteer, or other support personnel to submit up to two (2) additional letters of reference.
- 3.3 An Individual Charged, Convicted, or Found Guilty of An Offense.** If an individual subsequently receives a charge, conviction for, or is found guilty of, an offense, they will report this circumstance immediately to GymBC.
- 3.4 Providing False, Inaccurate, or Misleading Information.** If GymBC learns that an individual has knowingly provided false, inaccurate, or misleading information, or that they have failed to report a change in circumstances to GymBC as required by Section 3.3 above, the individual may be removed from their position and may be subject to further discipline in accordance with the [Complaint Management Handbook](#).
- 3.5 Enhanced Screening for Individuals Who Have Resided Outside of Canada.** Individuals who have not resided in Canada for at least five (5) years, and who fulfill increased or medium risk positions (i.e., Level 2 and 3) while attending or participating in GymBC activities with GymBC and/or other Gymnastics athletes in Canada registered with their respective PSO, must obtain the equivalent of a Vulnerable Sector Check or Enhanced Police Information Check from any country where they have spent 183 days (6 months) or more within the last five (5) years, prior to their arrival to Canada.

They must also provide written evidence of their previous compliance with the screening requirements of their most recent National Governing Body and provide written confirmation from an authorized representative (e.g., President, Executive Director) of the National Governing Body that they were, immediately prior to leaving, considered to be a member in good standing with the National Governing Body at all times during the most recent five (5) year period (or, if shorter, the

period commencing and finishing prior to their arrival in Canada). If any of those documents are in a language other than English or French, the documents must be provided along with a translation from a certified translator at the applicant's expense.

#### 4.0 Application Procedure

- 4.1 All screening documents must be submitted through [GymBC's Screening Form \(https://activitymessenger.com/p/Rkmr2bm\)](https://activitymessenger.com/p/Rkmr2bm).
- 4.2 Volunteers (not paid staff) for GymBC initiatives (judges, board members, chaperones, etc.) may access the Government of BC criminal record review system. This program is [accessible online \(https://justice.gov.bc.ca/eCRC/home.htm\)](https://justice.gov.bc.ca/eCRC/home.htm). Once volunteers obtain a free backcheck through this system, they will be required to upload the generated document through [GymBC's Screening Form](https://activitymessenger.com/p/Rkmr2bm). To access the password on this website, members must email [safety@gymbc.org](mailto:safety@gymbc.org).
- 4.3 GymBC's Screening form database will provide autogenerated emails to screened individuals to inform them that they require updated screening documents.

#### 5.0 Screening Review

Any individual who refuses or fails to provide the necessary screening documents, or makes an incomplete application, will be ineligible for the position sought or denied access to participate in a GymBC event and/or activity. The individual will be informed by GymBC that their application, position and/or accreditation will not proceed until such time as the screening documents are submitted. Completing and maintaining up-to-date screening requirements are the onus of the individual fulfilling positions/roles or seeking accreditation to events.

GymBC understands that there may be delays in receiving the results of a Criminal Record Check or a VSC. At its discretion, and upon request by the individual, the GymBC staff members (CEO or designate, e.g., Safety Officer) may permit the individual to participate in the role during the delay provided that the individual can demonstrate that they have commenced the Criminal Record Check or VSC application procedure within a reasonable timeframe. This permission may be denied or withdrawn at any time and for any reason.

GymBC recognizes that different information will be available depending on the type of screening document that the individual has submitted. For example, a Criminal Record Check 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 GymBC staff members will use their expertise and discretion when making decisions based on the screening documents that have been submitted.

- 5.1 **Decisions of the GymBC Staff:** Following the review of the screening documents and subsequent risk assessment (if applicable), the GymBC Staff will decide:
  - 5.1.1 The individual has passed screening and may participate in the desired position or event;
  - 5.1.2 The individual has passed screening and may participate in the desired position with conditions;
  - 5.1.3 The individual has not passed screening and may not participate in the desired position;  
or,
  - 5.1.4 More information is required from the individual.

In making its decision, the GymBC staff members will consider the type of offense, date of offense, and relevance of the offense to the position sought. The individual will be provided a copy of the GymBC staff members' decision which shall also be provided to the individual's Club where the application is rejected or where the GymBC imposes conditions.

**5.2 Screening Violations:** Where a Vulnerable Sector Check or Criminal Record Check indicates a previous criminal conviction, the GymBC staff members shall have the authority to conduct an additional risk assessment, which may include:

- 5.2.1 An interview with the individual and/or request further information from the individual about the nature and circumstances of the conviction in order to determine whether the conviction relates to a relevant offence;
- 5.2.2 A request for further character references;
- 5.2.3 A decision not to hire/select/assign or engage an individual who does not cooperate in providing further information pertaining to the nature and circumstances of a criminal conviction or participate in a risk assessment;
- 5.2.4 A decision not to hire/select/assign or engage an individual who has a current charge of, conviction for, or has been found guilty of, a relevant offence.
- 5.2.5 The GymBC staff members must decide that an individual has not passed screening if the screening documentation reveals any of the following:
  - 5.2.6 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 for trafficking and/or possession of drugs and/or narcotics
  - 5.2.7 If imposed in the last ten years:
    - a) Any crime of violence including but not limited to, all forms of assault
    - b) Any offense involving a minor or minors
    - c) Any offense involving theft or fraud
  - 5.2.8 If imposed at any time:

An individual's conviction for any of the following *Criminal Code* offenses:

    - a) Any offense of physical or psychological violence
    - b) Any crime of violence including but not limited to, all forms of assault
    - c) Any offense involving trafficking of illegal drugs
    - d) Any offense involving the possession, distribution, or sale of any child-related pornography

e) Any sexual offense

**5.2.9 Safe Sport violations:**

An individual is currently under suspension with GymBC or through GymCan's reciprocity agreement with all Canadian Gymnastics Provincial Sport Organizations.

**5.3 Conditions and Monitoring:** Excluding the incidents above which, if revealed, would cause the individual to not pass screening, GymBC staff members 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, role, or receive accreditation to a GymBC activity with conditions imposed. The GymBC staff members may apply and remove conditions at their discretion and will determine the means by which adherence to conditions may be monitored.

The records kept as part of the screening process include but are not limited to:

**5.3.1** An individual's Vulnerable Sector Check

**5.3.2** An individual's Criminal Record Check (for a period of three years)

**5.3.3** Records of any conditions attached to an individual's registration by GymBC staff

**5.3.4** Records of any discipline applied to any individual by GymBC, GymCan, through GymCan's reciprocity agreement with all Canadian Gymnastics Provincial Sport Organizations, by a GymBC Member Club, or by another sport or youth-serving organization (including other sport organizations).

**5.4 Renewal of Record Check Information:** Unless GymBC determines, on a case-by-case basis, to modify the submission requirements, individuals who are required to submit a Screening Disclosure Form, VSC, or Screening Renewal Form, are required to submit the documents as follows:

**5.4.1** A Criminal Record Check every three years

**5.4.2** A Vulnerable Sector Check every three years

GymBC may request that an individual provide any of the above documents at any time. Such request will be in writing and reasons will be provided for the request.

## **6.0 Confidentiality**

GymBC (and its member clubs) shall keep the results of criminal record checks and the screening process in general confidential and shall not disclose these results to any persons, unless such disclosure is required by law, is necessary for a disciplinary proceeding, or is in the best interest of the public.

## 8.0 Appendix A – Member Categories with Education and Screening Requirements and Recommendations

Member Type	Level of Risk	Review of GymBC Code of Conduct	Criminal Record Check (see 2.3)	Vulnerable Sector Check	Driver's Abstract	Commit 2Kids Training	CAC Safe Sport Training	CAC Making Headway	True Sport Clean 101	RIS for Activity Leaders
		Annually	Every 3 Years	Every 3 Years	On request	One time	One time	One time	One time	One time
Team BC Athlete	LOWER RISK	√							S	
CSI Targeted Athlete		√					√		√	
One Time Presenter / Infrequent IST		√								S
Judge	MEDIUM RISK	√	S	S		S	S			S
NCCP Learning Facilitator		√	√	S		S	√	S	S	√
Equipment Technician		√	√	S		S	S			√
GymBC Admin Staff		√	√	S		√	S		S	√
Club Admin Staff		√	√	S		S	S	S	S	√
Gym Club Leaders / Board Member		√	S	S		S				S
GymBC Board Member	INCREASED RISK	√	√	√		√				√
Team BC IST, Manager, Chaperone		√	√	√	S	S	S			√
Rec / Comp Coach		√	√	√	S	S	√	S	S	√
CSI Targeted Coach		√	√	√	S	S	√	√	√	√

√ = Required  
S = Suggested

## Additional Notes:

### **Annual Review of GymBC Code of Conduct**

This document and the rest of [Gymnastics BC's Complaint Management Handbook](#) are available [here](#).

### **Criminal Record Check**

These checks are currently required annually by GymCan for individuals attending those events, and can usually be completed through online systems. [https://pages.sterlingbackcheck.ca/landing-pages/c/cac\\_ace/](https://pages.sterlingbackcheck.ca/landing-pages/c/cac_ace/)

### **Vulnerable Sector Check**

This check must be completed every three years for all GymBC members who are required to have this check. [Contact your local police department or RCMP detachment](#).

### **Driver's Abstract**

Required for individuals who have driving responsibilities as a member of Team BC. <https://www.icbc.com/driver-licensing/getting-licensed/Pages/Your-driving-record.aspx>

### **Commit 2Kids Training**

Required by viaSport for GymBC staff and board members, and recommended as abuse prevention training for other members of GymBC. <https://www.commit2kids.ca/en/>

### **CAC Safe Sport Training**

Safe Sport training for coaches and NCCP learning facilitators. <https://coach.ca/safe-sport-training>

### **CAC Making Headway**

Concussion response training for coaches and programming personnel. <https://coach.ca/nccp-making-head-way-sport>

### **True Sport Clean 101**

Anti-Doping training for competitive coaches and competitive athletes. <https://www.cces.ca/truesportclean101untracked>

### **RiS for Activity Leaders**

Training for individuals involved in program implementation and leadership required by GymCan. Must be completed one time only. [https://gymnasticscanada.respectgroupinc.com/koala\\_final/](https://gymnasticscanada.respectgroupinc.com/koala_final/)