

Screening Policy

Purpose

Ontario Cycling (“OC”) is committed to providing a safe, inclusive, and responsible sport environment.

Screening is a critical component of OC’s risk management and governance framework.

Screening is a risk-based, role-appropriate process designed to protect participants, volunteers, staff, clubs, and the organization itself from preventable harm, including physical, psychological, financial, and reputational risk.

Screening is not limited to protecting minors or vulnerable persons. It is a governance safeguard that protects the Club, its Members, its Volunteers, its Board, and its financial and reputational stability.

Screening includes more than a police record check and may involve a combination of background verification, reference checks, Safe Sport training, Code of Conduct compliance, and ongoing disclosure obligations.

While “Vulnerable Participants” are defined in legal terms within this Policy, Ontario Cycling recognizes that vulnerability can also arise situationally through power imbalances, authority relationships, gender imbalance, physical ability disparity, isolation, or group dynamics.

Screening supports not only legal compliance, but also the creation of environments where all participants feel safe, respected, and confident in the leadership and governance of their club.

Scope

This Policy applies to all individuals in designated positions of trust or authority within OC and affiliated clubs, including but not limited to:

- Directors and Officers
- Employees
- Coaches
- Officials / Commissaires
- Ride Leaders
- Team Managers
- Chaperones
- Event Organizing Committee Members
- Volunteers with financial authority

- Any individual in a position of authority, supervision, or access to sensitive information

Definitions

- *Criminal Record Check (CRC)*: A search of the RCMP National Repository of Criminal Records.
- *Enhanced Police Information Check (E-PIC)*: A third-party facilitated criminal background screening process commonly used in Canadian sport.
- *Vulnerable Sector Check (VSC)*: A search including a CRC and verification for pardoned sexual offences where the role involves authority over vulnerable persons.
- *Vulnerable Participants*: Individuals under 18 years of age and/or individuals who may be unable to protect their own interests due to age, disability, or other circumstances.
- *Screening Committee*: A committee appointed by the President & CEO to review screening matters requiring further assessment.

Principles

OC adopts the following screening principles:

- Risk-based and proportionate to role exposure
- Fair and consistent decision-making
- Privacy-protective and minimum necessary information collection
- Aligned with Canadian sport Safe Sport best practices
- Respectful and non-discriminatory

Screening decisions will consider relevance of any findings to the specific role, time elapsed since any offense, patterns of behavior, demonstrated rehabilitation, and overall risk exposure.

OC acknowledges that feelings of vulnerability may arise even in adult environments, including situations involving power imbalance, skill disparity, gender imbalance, or isolation during training or rides. Screening contributes to participant confidence and perceived safety within these contexts.

Screening Levels

Screening requirements are determined by role risk exposure.

Level	Examples	Requirements
1 - Low Risk	<ul style="list-style-type: none"> • One-day volunteers • Supervised event volunteers 	<ul style="list-style-type: none"> • Application or registration • Code of Conduct acknowledgment • Role-based orientation • Annual Screening Attestation Form
2 - Moderate Risk	<ul style="list-style-type: none"> • Officials / Commissaires • Club board members (no direct youth supervision) • Ride leaders (adult programming) • Volunteers with limited access to sensitive information 	<ul style="list-style-type: none"> • CRC or E-PIC (every three years) • Minimum one (1) reference, where appropriate • Code of Conduct acknowledgment • Required Safe Sport training (where applicable) • Annual Screening Attestation Form
3 - High Risk	<ul style="list-style-type: none"> • Coaches working with minors • Ride leaders supervising youth • Team Managers traveling with athletes • Chaperones • Individuals with signing authority or significant financial control • Individuals with direct authority over Vulnerable Participants 	<ul style="list-style-type: none"> • CRC or E-PIC (every three years) • Vulnerable Sector Check (VSC) where the role involves ongoing authority over Vulnerable Participants • Minimum two (2) references • Required Safe Sport training • Code of Conduct acknowledgment • Annual Screening Attestation Form • Conditional participation may be imposed pending completion of screening

VSC requirements are role-driven and not automatically applied where no vulnerable participants are involved.

Digital Screening Process – Sterling BackCheck

Ontario Cycling utilizes Sterling BackCheck as its authorized third-party digital screening provider. All required CRC, E-PIC, and VSC screenings must be completed through the Sterling BackCheck portal unless otherwise approved by the President CEO.

Sterling BackCheck provides secure digital identity verification, encrypted record transmission, and centralized compliance tracking.

OC will record screening status as “Cleared,” “Cleared with Conditions,” or “Not Cleared” within its secure compliance registry. OC will not retain full police reports unless legally required.

Individuals residing outside Canada or unable to access Sterling BackCheck must contact OC to determine approved alternate screening options.

Frequency

- CRC / E-PIC: Every three (3) years
- VSC (where required): Every three (3) years
- Disclosure Forms: Every three (3) years
- Annual Screening Attestation: Required each year between police check cycles

Annual Screening Attestation

All screened individuals must complete an annual declaration confirming:

- No new criminal charges or convictions
- No new child protection or prohibition orders
- No new sport disciplinary sanctions
- Ongoing compliance with OC’s Code of Conduct and Safe Sport policies

Individuals have a continuing duty to disclose any relevant change in status immediately.

Screening Committee

The Screening Committee:

- Reviews flagged screening matters
- Assesses relevance and risk
- May request additional information
- May impose conditions or restrictions
- Determines clearance status

Screening Committee members must sign confidentiality agreements and declare conflicts of interest. Members with a conflict must recuse themselves from deliberation.

Screening decisions may be appealed in accordance with OC’s Appeal Policy.

Confidentiality & Records Management

Screening information is confidential.

Access is restricted to:

- President & CEO
- Designated senior staff
- Screening Committee (where required)

OC will collect and retain only information necessary to determine eligibility.

Where possible, OC will retain clearance status (“Cleared,” “Cleared with Conditions,” or “Not Cleared”) rather than full police record reports.

Digital records are maintained within the Sterling BackCheck administrative dashboard and OC will not store any police record reports and instead, will track status in a restricted-access compliance tracker for audit and reporting purposes.

International or Alternate Screening

Where an individual resides outside Canada or cannot obtain a required police check due to jurisdictional limitations, OC may accept:

- An International police certificate
- A statutory declaration
- Additional references
- Temporary conditions pending documentation

Non-Compliance

Failure to comply with screening requirements may result in:

- Ineligibility to serve
- Suspension of duties
- Removal from role

Appendix - Club & Team Role Screening Matrix

Role	Risk Level	CRC / E-PIC	VSC	References	Training	Annual Attestation
One-Day Event Volunteer	Level 1	No	No	No	Orientation	Yes
Club Board Member (No Youth Contact)	Level 2	Yes (3 yrs)	No	1	Safe Sport	Yes
Club Treasurer	Level 3 (Financial Authority)	Yes (3 yrs)	No	1-2	Governance Orientation	Yes
Ride Leader – Adult Group	Level 2	Yes (3 yrs)	No	1	Safe Sport	Yes
Ride Leader – Youth Program	Level 3	Yes (3 yrs)	Yes	2	Safe Sport + NCCP (if applicable)	Yes
Coach – Youth	Level 3	Yes (3 yrs)	Yes	2	NCCP + Safe Sport	Yes
Team Manager (Travel)	Level 3	Yes (3 yrs)	Yes - if youth	2	Safe Sport	Yes
Commissaire / Official	Level 2	Yes (3 yrs)	No - unless youth supervision	1	Safe Sport	Yes
Chaperone	Level 3	Yes (3 yrs)	Yes	2	Safe Sport	Yes
Event Finance Volunteer	Level 3	Yes (3 yrs)	No	1	Governance Orientation	Yes