



Policy Title	Screening Policy
Responsible Committee	Governance & Risk Management
Date of Approval	May 2026

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This Policy has been prepared by Water Polo Canada and is applicable to Water Polo Canada, its members, affiliated organizations, and registrants. This document cannot be modified without consultation with and approval by Water Polo Canada.

Preamble

1. Water Polo Canada (WPC) understands 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.

Definitions

The following terms have these meanings in this Policy:

“Board” means the Board of Directors for Water Polo Canada

“Criminal Record Check” means a search of the RCMP Canadian Police Information Centre (CPIC) system for adult convictions

“Date of Approval” means as stated on Page 1 of the Policy;

“Enhanced Police Information Check (E-PIC)” means a Criminal Record Check plus a search of Local Police Information, available from Sterling Backcheck;

“including” means including but not limited to;

“Local Police Information (LPI)” means additional conviction and selected non-conviction information in national and local police data sources which may be relevant to the position sought;

“National-level activities” means competitions/events and training hosted by WPC;

“Officials” means referees and delegates;

“Participant” refers to any registrant that participates in training or competition hosted by WPC

“Policy” means this Screening Policy;

“PSO” refers to a Provincial or Territorial Sport Organization that is responsible for the management of water polo within its provincial or territorial boundaries;

“Responsible Subcommittee” means as stated on Page 1 of the Policy;

“Vulnerable Registrant” holds the same definition as “Vulnerable Participant” in the UCCMS.

“Vulnerable Sector Check (VSC)” means 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; and

“WPC” means Water Polo Canada

Application

2. This policy applies to all individuals whose position with WPC national-level activities is one of trust or authority which may relate to, at a minimum, finances, supervision, or Vulnerable Registrants.
3. While all individuals associated with WPC national-level activities will be required to register in WPC’s National Registration and Event Management Database, only those individuals in certain roles will be required to obtain a criminal record check or submit screening

documents, as not all positions pose a risk of harm to WPC or Registrants. WPC will determine which individuals will be subject to screening using the following guidelines (WPC may vary the guidelines at their discretion):

Level 1 – Low Risk - 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 Registrants. Typically are helping out on a non-regular or informal basis. Examples include:

- a) Minor officials;
- b) Event photographers; and
- c) Hospitality room hosts.

Level 2 – Medium Risk – 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 Registrants. Examples include:

- d) Non-coach employees;
- e) Directors; and
- f) Officials.

Level 3 – High Risk – Individuals involved in high-risk assignments who occupy positions of trust and/or authority, have a supervisory role, direct others, are involved with finances, and who have frequent or unsupervised access to Vulnerable Registrants. Examples include:

- g) Team managers
- h) Coaches and
- i) Athlete Support Personnel.

Screening Committee

4. 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. WPC 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.
5. 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 WPC. 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.

6. 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.
7. Nothing in this policy restricts or limits the Screening Committee from requesting the individual's authorization to contact any professional, sporting, or other organization to assess the individual's suitability for the position that they are seeking. The Screening Committee may also request further information from the individual on more than one occasion, subject to the individual's right to insist that the Screening Committee decide based on the information before it.
8. The Screening Committee may, where appropriate, draw an adverse inference from an individual's failure to provide information or answer queries.
9. 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 WPC or to another individual.
10. 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.
11. If the Screening Committee determines based on the individual's screening application, in addition to any further material received by it, that the individual does not pose a risk to the members of WPC, the Screening Committee shall approve the individual's application, subject to the Screening Committee's right to impose conditions.
12. 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 of WPC, which may disseminate the decision as they see fit to best fulfil the mandate of WPC.
13. An individual whose screening application has been denied or revoked may not re-apply to participate in the programs or activities of WPC for two (2) years from the date the rejected application was made.

Screening Requirements

14. A Screening Requirements Matrix is provided as **Appendix A**.
15. It is the policy of WPC that all Level 2 and 3 individuals must undergo screening. It is the combined responsibility of designated WPC staff member(s) to ensure that these individuals complete all applicable screening elements before participating in any national level activities (as listed below, in Appendix A).

- a) If an individual subsequently receives a charge, conviction for, or is found guilty of, an offense they will report this circumstance immediately to WPC. Additionally, the individual will inform WPC of any changes in their circumstance that would alter their original responses in their Screening Disclosure Form.
- b) If WPC 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 Sport Integrity and Complaints Policy.

Minors

16. The UCCMS, which WPC and its registrants adhere to, defines a Minor as someone who is younger than 19 years of age (as defined in the UCCMS). When screening a Minor, WPC will:

- a) not require the Minor to obtain a VSC or E-PIC; and
- b) in lieu of obtaining a VSC or E-PIC, require the Minor to submit up to two (2) letters of reference: a letter demonstrating experience working in a similar position with vulnerable individuals for another organization, and a letter from a sport organization.

17. Notwithstanding the above, WPC may ask a Minor to obtain a VSC or E-PIC if WPC suspects the Minor has an adult conviction and therefore has a criminal record. In these circumstances, WPC will be clear in its request that it is not asking for the Minor's *youth record*. WPC understands that they may not request to see a Minor's youth record.

Renewal

18. Unless the Screening Committee determines, on a case-by-case basis, to modify the submission requirements, individuals who are required to submit an E-PIC, Screening Disclosure Form, or Screening Renewal Form, are required to submit the documents as follows:

- a) an E-PIC every three years;
- b) a Screening Disclosure Form (**Appendix B**) every three years;
- c) a Screening Renewal Form (**Appendix C**) every year; and
- d) a Vulnerable Sector Check once.

19. 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 WPC, could affect the assessment of the individual's suitability for participation in the programs or

activities of WPC, or the individual's interactions with other individuals involved with WPC.

Orientation, Training, and Monitoring

20. The type and amount of orientation, training, and monitoring will be based on the individual's level of risk, at the discretion of WPC (see Appendix A).
21. Role-specific 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.
22. Training may include, but is not limited to: certification courses, online learning, mentoring, workshop sessions, webinars, on-site demonstrations, and peer feedback.
23. At the conclusion of orientation and training, the individual will be required to notify WPC of its completion (and submit their certificate(s), if applicable).
24. Monitoring measures will be proportionate to the risk level of the role. Measures may include, but are not limited to: regular reporting, direct observation, site visits, or adherence to facility security protocols.

How to Obtain an E-PIC or VSC

25. An E-PIC may be obtained online via <http://www.backcheck.net/e-pic.htm> or requested through WPC's National Registration and Events Management Database at the time of registration.
26. Individuals 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. Fees may also be required.
27. Fingerprinting may be required if there is a positive match with the individual's gender and birth date.
28. WPC understands that it may be required to assist an individual with obtaining a VSC. Individuals who require assistance should contact WPC.

Procedure

29. Screening documents must be submitted to the Screening Committee.
30. 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.

31. WPC understands that there may be delays in receiving the results of an E-PIC or a VSC. At the discretion of WPC, 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.
32. WPC recognizes that different information will be available depending on the type of screening document that the individual has submitted. For example, an E-PIC 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 Screening Committee will use its expertise and discretion when making decisions based on the screening documents that have been submitted.
33. Following the review of the screening documents, the Screening Committee will decide:
- a) the individual has passed screening and may participate in the desired position;
 - b) the individual has passed screening and may participate in the desired position with conditions;
 - c) the individual has not passed screening and may not participate in the desired position; or
 - d) more information is required from the individual.
34. 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.
35. The Screening Committee may decide that an individual has not passed screening if the screening documentation reveals any of the following:
- a) if imposed in the last ten years:
 - i. any offense involving the use of a motor vehicle, including but not limited to impaired driving;
 - ii. any offense involving conduct against public morals; or
 - iii. any offense involving theft or fraud.
 - b) if imposed at any time:
 - i. any offense involving a Minor or Minors;
 - ii. any offense of assault, physical or psychological violence;
 - iii. any offense involving trafficking or possession of illegal drugs;
 - iv. any offense involving the possession, distribution, or sale of any child abuse

material; or

- v. any sexual offense.

36. The Screening Committee may determine that an individual has not passed screening if the screening documentation reveals any criminal charge or offense, regardless of when it occurred, that, in the opinion of the Screening Committee, may pose a risk of harm to Water Polo Canada and/or its registrants. In making this determination, the Screening Committee shall consider both the nature of the charge or offense and the specific role for which the individual is seeking approval.

Conditions and Monitoring

37. Excluding the incidents above which, if revealed, would cause the individual to not pass screening, 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

38. 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.

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

- a) An individual's Vulnerable Sector Check;
- b) An individual's E-PIC (for a period of three (3) years);
- c) An individual's Screening Disclosure Form (for a period of three (3) years);
- d) An individual's Screening Renewal Form (for a period of one (1) year);
- e) Records of any conditions attached to an individual's registration by the Screening Committee;
- f) Records of any discipline applied to any individual by WPC or by another sport organization.

Languages

40. This Policy will be provided by WPC in both official languages of Canada.

41. In this Policy words denoting any gender include all genders and the rest of the sentence is to be construed as if the necessary grammatical changes have been made.

Communication

42. WPC will ensure a current version of the Policy is publicized on its organization's website within a reasonable time following the Date of Approval.

43. WPC and its members will use reasonable efforts to ensure that this Policy is communicated to those who will be responsible for upholding it as well as those who will be responsible for its implementation.

Review and Approval

44. This Policy will be effective as of the Date of Approval following approval by the WPC Board of Directors and will be reviewed regularly by the Responsible Subcommittee.

Appendix A – Screening Requirements Matrix

Risk Level	Roles (Note Minor Exception Below)	Training Recommended/Required	Screening
Level 1 Low Risk	a) Parents, youth or volunteers acting in non-regular or informal basis (e.g., minor officials, deck photographers and hospitality room hosts)	See WPC Safe Sport Compliance Program Matrix for recommended Safe Sport training Plus any role-specific training and orientation as determined by WPC	Not applicable
Level 2 Medium Risk	a) Non-coach employees b) Directors c) Officials	See WPC Safe Sport Compliance Program Matrix for required and recommended Safe Sport training Plus any role-specific training and orientation as determined by WPC	<ul style="list-style-type: none"> • Complete a Screening Disclosure Form (Appendix B) • Complete and provide an E-PIC (or VSC if specifically requested by WPC) • Provide one letter of reference related to the position, if requested • Provide a driver's abstract, if requested
Level 3 High Risk	a) Athlete support personnel b) Coaches c) Team managers	See WPC Safe Sport Compliance Program Matrix for required and recommended Safe Sport training Plus any role-specific training and orientation as determined by WPC	<ul style="list-style-type: none"> • Same as Level 2 Requirements

Note: all individuals participating in WPC activities must also be registered in the National Registration and Event Management Database.

Appendix B – [Screening Disclosure Form](#)

Appendix C – [Screening Renewal Form](#)