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THE ULTIMATE HOCKEY AND SUMMER CAMP EXPERIENCE.

Title: Background Check Compliance Policy
Revised: March 10, 2026
Signed & Approved by:

Kevin McLaughlin, Owner & Executive Director

This policy can be made available in an accessible format upon request.

Objective

Hockey Opportunity Camp ("HOC", "we" or "our") is committed, first and foremost, to ensuring the safety of all of our campers and staff and second, to maintaining appropriate controls to protect our assets from damage, theft or fraud. Because the safety of our campers is of utmost importance, we will conduct certain diligence on Employees and applicants for employment ("Applicants") to satisfy requirements imposed by insurers, as well as the Ontario Camps Association. To fulfil these obligations, HOC will obtain and review background information before allowing an Applicant to join HOC and begin their duties.

Applicability

This policy applies to all of HOC's full-time staff, seasonal staff, Counsellor in Training ("CIT") and, as appropriate, volunteers. Employees are required to undergo pre-employment background checks according to the requirements stated in the Background Check Schedule and/or the employment offer. Employees may be subsequently required to undergo occasional checks or re-checks as outlined in this Policy.

Policies

TYPES OF BACKGROUND CHECKS

HOC will conduct background checks by requesting that an Applicant provide a copy of certain documents/certifications (e.g. Vulnerable Sector Check); by directly verifying any of the Applicant's documents/certifications submitted through the Campsite portal (e.g. swimming qualifications); or by using a third-party service provider engaged by HOC to obtain and review relevant documents (e.g. Driver's Abstract) and provide HOC with a report. HOC requires that all Applicants have a background check completed before

commencing employment in accordance with the Background Check Schedule below. Re-checks for permanent and returning Employees will be required where the validation period has elapsed.

All Full-time Directors will collect, use and disclose background check information in accordance with the HOC *Employee Privacy Policy*.

RESPONSIBILITIES OF THE APPLICANT

The Applicant will be required to complete background checks in advance of the due date stated within HOC's Campsite portal. Applicants will be required to cover the costs of obtaining all required documents/certifications.

NOTICE TO APPLICANTS AND STAFF

Applicants will be notified of background check requirements at the following junctures:

- Employment applications
  - The application indicates that successful Applicants will be required to provide proof of specific documents/certifications if hired.
- Interviews
  - A discussion with respect to background check requirements, including what information will be collected and why, will take place during the interview process. However, an Applicant will not be asked to disclose information related to criminal or driving history until after an offer is extended.
- Offer letters and contracts
  - An employment offer will indicate that the offer is conditional on the successful completion of relevant background checks. Once an offer has been extended, the Applicant is invited to provide any advance explanation of any issues that arise during the background check process.
- Vendor data collection and consent forms
  - If the Applicant is requested to submit to a background check conducted by a third-party service provider, the service provider may provide a formal notice of the collection, use and disclosure of personal information, including the types and sources of the information and information about the service provider.

Employees who are subject to a re-check requirement must be reminded in advance of any re-check being initiated.

INFORMED CONSENT

Upon accepting the Employment Offer, a Vulnerable Sector Check (staff 18 years of age and older) must be completed. An Applicant will complete a Background Check Data Collection and Consent Form when an Applicant attends a local police station to obtain their Vulnerable Sector Check. The Applicant's informed consent will be provided according to each police department's policy.

If an Applicant refuses consent for a required background check, an offer of employment may be withdrawn. If an Employee refuses or withdraws consent for a required re-check, they may be subject to reassignment or termination according to the discretion of the Full-Time Directors.

The Full-Time Directors must ensure evidence of consent is retained and safeguarded in accordance with HOC's *Employee Privacy Policy*, *Data Retention Policy* and retention schedules established for employee personal information. Background Check information may be retained in HOC's systems, third-party service providers and/or vendor systems or both.

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BACKGROUND CHECK SCHEDULE

	Staff in a position of trust and authority:
Vulnerable Sector Check ***valid for 18 months****	*All Staff, including full-time, seasonal, and volunteers,* as indicated in an Employment Offer, who are over 18 years of age
Offence Declaration Form ***Required every year. Parents must sign on behalf of an employee under 18***	All Staff, including full-time, seasonal, volunteers, CITs, as indicated in an Employment Offer
Aquatic Certification ***valid for "2" years***	Seasonal Staff, including Counselling, Activity, & CITs
Canadian Water Ski Instructor Course (CWSIC) ***current NCCP status***	Seasonal Staff, including Water Ski Staff
Driver's Abstract ***valid for "1" year***	Seasonal & Full-Time Staff, as indicated in an Employment Offer
First Aid Certificate ***valid for "3" years***	All Staff, including full-time, seasonal, volunteers, CITs
Ontario Worker Health & Safety ***no expiry**	All Staff, including full-time, seasonal, and volunteers
Hockey Certificate ***current NCCP status***	Seasonal & Full-Time Hockey Staff, as indicated in an Employment Offer
Pleasure Craft Operators Card ***no expiry***	Seasonal Staff, including Water Ski Staff
Respect in Sport – Activity Leader Program ***no expiry**	All Staff, including full-time, seasonal, volunteers, CITs
WHMIS ***valid for "1" year***	Seasonal & Full-Time Staff, as indicated in an Employment Offer

ACCREDITED MEMBER
ONTARIO CAMPS ASSOCIATION

TIMING OF BACKGROUND CHECKS

No Applicant may commence employment until all background checks are successfully completed. Because of this, background checks should be initiated immediately once an employment offer is extended to an Applicant. When all documents/certifications are received by HOC, the information will be reviewed, and a final decision will be made on whether to confirm the offer. Employees may start work at any time following a favourable determination by HOC.

If an Applicant's unwillingness to cooperate in good faith with the background check process puts the planned start date in jeopardy, the offer may be withdrawn. However, if a protracted turnaround time is necessary due to factors outside of the Applicant's control, all reasonable efforts will be made to postpone the start date until all required background checks are complete.

Background checks during employment should be conducted no more frequently than required by the applicable governing body. The Camp Director will monitor compliance and, once this interval has passed, HOC will contact the employee to notify them of the re-check requirement.

REVIEW PROCESS AND CRITERIA

HOC will identify flags in documents/certification results. A "flag" is a discrepancy between an Applicant or Employee's claims and the information retrieved through the background check process, a piece of information that may be interpreted as problematic (such as a criminal conviction or recent driving conviction) or additional information that raises one or more concerns. Flags are not necessarily negative, and in many cases will not disqualify an Applicant or employee from employment. However, they must be reviewed in accordance with this Policy. HOC's Sr Staff Team will make a final decision as to whether or not a flag will result in a change to or a withdrawal of the employment offer.

Vulnerable Sector Check

- Does the behaviour for which the applicant was convicted, if repeated, pose any threat to HOC's ability to carry on its business safely and efficiently?
- What were the circumstances of the conviction and the particulars of the offence involved - i.e. how old was the applicant when the events in question occurred, and were there any extenuating circumstances?
- How much time has elapsed since the conviction? What has the Applicant done during that period of time? Has the Applicant shown any tendencies to repeat the kind of behaviour for which the Applicant was convicted? Has the Applicant

demonstrated a firm intention to rehabilitate themselves? Does the Applicant's record disqualify the Applicant from insurance coverage?

Driver Abstract

- Does the Applicant show a pattern of repeated irresponsible driving?
- Does the Applicant's driving record disqualify the applicant from insurance coverage?

Prior to making a final decision, any flags which may lead to disqualification will be carefully reviewed to ensure compliance with human rights legislation, in particular, the *Ontario Human Rights Code*. If possible, human rights issues are identified but may be overridden by a legally permissible occupational requirement, then that requirement must be documented in the Applicant's file.

WITHDRAWAL OF OFFER

If the results of the background check are considered unsatisfactory, the Camp Director will prepare and send written communication to the applicant by e-mail indicating that the offer of employment has been withdrawn. As appropriate, the communication should indicate the name and contact information of the third-party service provider responsible for conducting the background check and notify the applicant of his or her right to request a copy of the report, dispute its findings and be informed of the nature and sources of other information HOC has collected about him or her other than from the background check report. This communication must be documented in the Applicant's file.

APPLICABLE LAW

HOC's employment premises are located in Ontario, and employee relationships are regulated by provincial law. HOC has designed this policy to be compliant with applicable laws and regulations, including the Ontario Human Rights Code. We also seek to comply with applicable privacy laws, including the federal *Personal Information Protection and Electronic Documents Act*. Further information is contained in our *Employee Privacy Policy*.

POLICY REVIEW AND ADMINISTRATION

This policy is managed by the Camp Director and will be reviewed on an annual basis for effectiveness and compliance. Exceptions to this policy, other than those explicitly set out in it, may only be authorized by the Camp Director.