

CAMP KAHQUAH

Background Check Policy

Table of Contents

1. Purpose
2. Scope
3. Background Check Vendor
4. Notice to Applicants & Employees
5. Informed Consent
6. Required Background Check Services
7. Timing of Background Checks
8. Review Process & Criteria
9. Withdrawal of Offer
10. Applicable Law
11. Policy Review & Administration

PURPOSE

Camp Kahquah is committed to ensuring the safety of all of its campers and employees while at camp and maintaining appropriate controls to protect its assets from theft, fraud, or unsafe people being on site. It is of utmost importance to conduct certain diligence on employees to satisfy requirements imposed by insurers, the OCA, and for the safety of all our campers. To fulfill these obligations, Camp Kahquah will obtain and review background information before allowing an applicant to serve in the applied for position.

SCOPE

This policy applies to all Camp Kahquah summer volunteers and staff during kids camp, family camp, retiree's retreats, and retreats where there are minors under the direct supervision of Camp Kahquah. Also, anytime there is a possibility of a staff or volunteer of Camp Kahquah on site under the age of 18 (CREW/LIT), all other volunteers and staff must also have completed a background check. Applicants in the aforementioned categories are required to undergo pre-employment background checks according to the timetables outlined in the employee contract (i.e. if a volunteer is coming up June 26th, a completed background check must be completed prior to this date). Current Camp Kahquah staff are required to undergo occasional background checks according to the timelines outlined in this policy.

BACKGROUND CHECK VENDOR

Camp Kahquah has selected *SterlingBackcheck* as its primary vendor for background check services. All background checks required under this policy will be conducted by SterlingBackcheck. In some cases the Executive Director may allow an applicant to provide a background check from another vendor if they deem it appropriate (i.e. Vulnerable Sector Screening, Under 18 years of age).

The Executive Director or Office Manager will be the only employees to access background check results from SterlingBackcheck's system, but will set up delegates from time to time who can access and review results in the Executive Director or Office Manager's extended absence. When there is a user change, the Executive Director must notify SterlingBackcheck as soon as practical so that user accounts may be activated or deactivated accordingly.

NOTICE TO APPLICANTS AND EMPLOYEES

Job applicants must be notified of background check requirements at the following junctures:

- Camp Kahquah Staff/Volunteer Application
 - The application indicates that successful applicants will be required to undergo a background check through the selected vendor of Camp Kahquah.
 - The applicant is also notified that they are responsible for the cost of the check.
- In an interview

- The interviewers may mention the background check and answer the applicant's questions about what information will be collected and why, but should not ask the applicant to disclose information relating to criminal history, credit history or driving history until an offer is extended. If any such information is disclosed, it should not be considered in deciding whether to extend an offer.
- Offer letters and contracts
 - Must indicate that the offer is conditional on satisfactory completion of a background check. Once an offer has been extended, this background check policy may be presented to the applicant on request, and the applicant may be invited to provide any advance explanation of information that may arise during the background check.
- The Data Collection and Consent Form (online through SterlingBackcheck)
 - will provide formal notice of the collection, use, transfer and disclosure of personal information, including the exact types and sources of the information and information about SterlingBackcheck.

At the beginning of employment, all employees, whether or not they are in a position subject to re-checks, must be notified that ongoing background checks are required for year round Camp Kahquah staff, and that if they occupy or move into a position in that category, the required checks will be conducted according to the timelines set out in this policy. Employees who are subject to a re-check requirement must be reminded in advance of any re-check being initiated.

INFORMED CONSENT

Before a background check can be completed, a Data Collection and Consent Form must be completed through SterlingBackcheck's online interface. Camp Kahquah's online notice and consent forms are automatically sent to the applicant when an order is placed through this system. When placing an order, the Executive Director must ensure that email invitations and notice and consent language are generated in English or French according to the applicant or employee's preference. If for any reason an applicant cannot use a computer or the internet to complete forms, the Executive Director will provide approved paper forms to be completed by the applicant, with the help of an assistant if necessary. If an applicant has to use a local police station for their background check their informed consent will be provided through each individual police departments policy.

If an applicant refuses consent for a required background check, the offer of employment should be withdrawn. If an employee refuses or withdraws consent for a required re-check, he or she may be subject to reassignment or termination according to the discretion of the Executive Director and Board of Directors.

The Executive Director must ensure that evidence of consent is retained and safeguarded in accordance with Camp Kahquah's privacy policy, data retention policy and retention schedules for employee personal information. It may be retained in Camp Kahquah's systems, SterlingBackcheck's systems or both.

REQUIRED BACKGROUND CHECK SERVICES

Camp Kahquah requires its staff and volunteers to have a background check completed before commencing employment. Re-checks for returning staff will be conducted every other year with a signed Offense Declaration in the years that they are not being checked.

Volunteers and Staff in a position of trust and authority:

This includes all cabin leaders, year round staff, senior staff and programming team

- **Volunteers and staff under 18**

- Must obtain a valid criminal record check from their local police station, as the results cannot be given out to us. You must scan/fax this to the Camp Kahquah Office or upload it through the staff portal prior to your time of service. Where applicable, parents may sign an Offense Declaration Form for their children verifying their criminal background.

Volunteers and staff between the ages of 18-29

- Must complete a Background Check through *SterlingBackCheck* at the link that is provided to you by Camp Kahquah. If you already have a Vulnerable Sector Screening check done on you and it is dated within six months, this is also valid. You must scan and send this to the Camp Kahquah Office or upload it through the staff portal prior to your time of service.
- In certain cases staff who have recently turned 18 may not be able to provide sufficient information for *SterlingBackCheck* to complete their background check. In these instances a valid Vulnerable Sector Screening from their local police station must be conducted OR the individual must print off the page provided by *SterlingBackCheck* and bring it to the closest police station and complete the guidelines provided.

- **Volunteers and staff 30 and over**

- Must provide a Vulnerable Sector Check that is dated in the current year of service, provided by your local police department. You must scan/fax this to the Camp Kahquah Office or upload it through the staff portal prior to your time of service.

- **Volunteers associated with a ministry partner (I.e. Emmanuel Bible College, BIC Canada)**

- A copy of their background check from their parent organization must be provided to Camp Kahquah.
- A signed Camp Kahquah Offense Declaration must be completed prior to service.

All other Volunteers During our Summer Camp Season

Kitchen, maintenance volunteers, etc. If unclear final decision is made by the Executive Director

- **Volunteers and staff under 18**

- Must obtain a valid criminal record check from their local police station, as the results cannot be given out to us. You must scan/fax this to the Camp Kahquah Office or upload it through the staff portal prior to your time of service.

- **Volunteers over the age of 18**

- Must complete a Background Check through *SterlingBackCheck* at the link that is provided to you by Camp Kahquah. If you already have a Vulnerable Sector Screening check done on you

and it is dated in the current year of service, this is also valid. You must scan/fax this to the Camp Kahquah Office or upload it through the staff portal prior to your time of service.

Camp Kahquah has done extensive research on the implementation of our background check policies. For any questions regarding our background check policies or *SterlingBackCheck*, please email kahquah@gmail.com

TIMING OF BACKGROUND CHECKS

Pre-employment backgrounds checks should be initiated immediately once an offer is extended. When the entire report is completed by *SterlingBackCheck*, it may be reviewed and a final decision made. If the final decision is made to confirm the offer, the applicant may start work at any time following the final decision, as dictated by Camp Kahquah. Applicants may not start work until the background check is completed and reviewed.

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 efforts must be made to postpone the start date until all required background check services are complete. If an extended turnaround time results from the existence of protected characteristics such as record of offences (for example, the applicant requires fingerprints to clarify criminal record information), or country of origin (searches must be completed overseas), or if it is warranted by exceptional business requirements, the Executive Director may grant an exception and permit an applicant to start work on a probationary basis pending completion of the background check and a final decision. Once the background check is completed, if the decision is made not to proceed with the hire, the employee will be subject to termination.

Background checks during employment should be conducted no more frequently than once a year. The Executive Director will monitor compliance and, once this interval has passed, will contact the employee to notify them of the re-check requirement. Once this is done, the Executive Director will initiate the re-check with *SterlingBackCheck*.

REVIEW PROCESS AND CRITERIA

SterlingBackCheck will identify flags in background check results. A flag is a discrepancy between the applicant or employee's claims and the information retrieved (such as a mismatch in dates of employment or degree received), a piece of information that may be interpreted as derogatory (such as a criminal conviction or a bankruptcy), or additional information that has been retrieved for reference (such as additional names on a credit report or inclusion on a list of politically exposed persons). Flags are not inherently negative, and in most cases will not disqualify an applicant or employee, but require review in accordance with this policy.

- **Criminal Record Check**
 - Does the behaviour for which the applicant was convicted, if repeated, pose any threat to Camp Kahquah'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.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 he or she shown any tendencies to repeat the kind of behaviour for which he or she was convicted? Has he or she shown a firm intention to rehabilitate him - or herself?
- Does the applicant's record disqualify him or her from insurance coverage, work on a particular client account or required foreign travel?
- **Education Verification**
 - Does the applicant have the education required for the position?
 - Did the applicant intentionally or materially misstate his or her education?
- **Employment Verification**
 - Does the applicant have sufficient experience for the position?
 - Did the applicant intentionally or materially misstate his or her education?
- **Driver Abstract**
 - Does the applicant show a pattern of repeated irresponsible driving?
 - Does the applicant's driving record disqualify him or her from insurance coverage?
- **Credit Check**
 - Does the applicant show a pattern of repeated irresponsible or fraudulent financial behaviour?

Prior to making a final decision, any flags which may lead to disqualification must be carefully reviewed to ensure compliance with human rights law. 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.

The Executive Director must ensure background check results are retained and safeguarded in accordance with Camp Kahquah's privacy policy, data retention policy and retention schedules for employee personal information. It may be retained in Camp Kahquah's systems, *SterlingBackCheck's* systems or both.

WITHDRAWAL OF OFFER

If a background check result is deemed to be unsatisfactory, the Executive Director will immediately prepare and send written communication to the applicant by e-mail indicating that the offer has been withdrawn due to information found in the background check report. The communication must indicate the name and contact information of *SterlingBackCheck* 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 Camp Kahquah has collected about him or her other than from the background check report. This communication must be documented on the applicant's file.

APPLICABLE LAW

Camp Kahquah's employees and volunteers are located in Ontario, and employee relationships are regulated by provincial law. Camp Kahquah has designed this policy in consultation with legal counsel to be compliant

with the following provincial privacy, human rights and consumer reporting laws and their associated regulations and regulatory guidance.

- Personal Information Protection Act
- Human Rights Code
- Human Rights Act

POLICY REVIEW AND ADMINISTRATION

This policy is managed by the Executive Director in consultation with compliance leadership, and must 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 Board of Directors.

Update and Revision History

- Created February 2016
- Updated June 2016
- Updated and Revised February 2017

Offense Declaration 2017 for Staff over 18 - Camp Kahquah

I declare, since the last Criminal Background Check collected by Camp Kahquah or BIC Canada, that:

- I have **no** convictions under the *Criminal Code of Canada* up to and including the date of this declaration for which a pardon has **not** been issued or granted under the *Criminal Records Act (Canada)*.

Name: _____

Date: _____

Signature: _____

Date: _____

This section is only to be completed if the above section does not apply to you.

I declare, since the last Criminal Background Check collected by Camp Kahquah or BIC Canada, that:

- I **have** convictions to declare for offences under the *Criminal Code of Canada* up to and including the date of this declaration for which a pardon has **not** been issued or granted (i.e. you have charges or are in the process).

Details: _____

Name: _____

Date: _____

Signature: _____

Date: _____

***If there are declarations to be made, the Executive Director will determine the recency of the charge and the relevancy of the charge to their work at Camp Kahquah. The Executive Director will be in contact with the volunteer within 48 hours if this is the case. If there are no declarations to be made, the volunteer/staff member will continue with the hiring process or volunteer service and the Executive Director has no need to contact the applicant/volunteer regarding background info.*

Offense Declaration Staff Under 18 - 2017 - Camp Kahquah

I declare, prior to the beginning of my child's volunteer service at Camp Kahquah, that:

- They have **no** convictions under the *Criminal Code of Canada* up to and including the date of this declaration for which a pardon has **not** been issued or granted under the *Criminal Records Act (Canada)*.

Parent/Guardian Name: _____ Date: _____

Signature: _____ Date: _____

This section is only to be completed if the above section does not apply to you.

I declare, prior to the beginning of my child's volunteer service at Camp Kahquah, that:

- They **have** convictions to declare for offences under the *Criminal Code of Canada* up to and including the date of this declaration for which a pardon has **not** been issued or granted (i.e. they have charges or are in the process).

Details: _____

Parent/Guardian Name: _____ Date: _____

Signature: _____ Date: _____

If there are declarations to be made, the Executive Director will determine the recency of the charge and the relevancy of the charge to their work at Camp Kahquah. The Executive Director will be in contact with the parents within 48 hours if this is the case. If there are no declarations to be made, the volunteer/staff member will continue with the hiring process and the Executive Director has no need to contact parents.