

## Vulnerable Persons Protection Policy

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### Intent

El Sistema Grey Bruce - The Big Sound (also referred to as The Big Sound and/or TBS) is committed to the health, wellbeing and happiness of our program participants. We understand that we have additional responsibilities associated with working with people who are considered to be vulnerable as defined by the Criminal Records Act. The intent of this Policy is to create guidelines in order to ensure we have measures in place to protect our participants. By understanding the risks and creating procedures specific to employees, independent contractors and volunteers (also referred to as program personnel) we aim to minimize any potential dangers/threats that our participants may face. This Policy is to be used in conjunction with other organization policies, procedures and guidelines and is in no way a standalone document.

### Scope

This scope of this Policy is for all existing employees, independent contractors and volunteers of TBS as well as applicants.

### Definitions

Risk – Risk as defined in this document is specific to the danger which program participants may face as at the hands of program personnel who are mandated to work with them.

Vulnerable Person – As defined by the [Criminal Records Act](#), means a person who, because of his or her age, a disability or other circumstances, whether temporary or permanent,

- (a) is in a position of dependency on others; or
- (b) is otherwise at a greater risk than the general population of being harmed by a person in a position of trust or authority towards them.

### Guidelines

#### Risk Assessment

- TBS will conduct a detailed risk assessment to determine the level of risk associated with each position, including both paid and unpaid (volunteer) positions.
- The risk assessment will take into account issues including but not limited to:
  - Level and regularity of contact with participants;
  - How time is spent with participants; and
  - Level of trust inherent in the position.
- The completed risk assessment will be required for many different purposes in order to create protection guidelines such as types or check which will be required and levels of supervision.

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- Risk assessments will also be conducted periodically to ensure accuracy as well as any time there is a significant change in duties.

### Job Responsibilities and Recruitment

- All positions in the organization will be defined and a position description will be written in order to ensure that screening methods are consistent.
- With defined responsibilities, TBS will be able to provide a clear and accurate picture of what each position will entail.
- These recruitment guidelines shall also be communicated to anyone interested in becoming a volunteer or working for TBS through the use of an information package (referred to as the Orientation Handbook).
- All program personnel will be asked to fill out an application form with areas for signatures and dates. In addition, each potential employee/volunteer will be provided with information/resources on:
  - The purpose of gathering information;
  - That information will only be used for the reason which is listed;
  - That there may be a termination of the employment/volunteer relationship if information is falsified;
  - The need for Criminal Background Checks for most positions; and
  - That flagged Criminal Record Checks will only be a reason for automatic disqualification if it related directly to the position for which they are applying.

### Selection Process

- All potential program personnel must participate in the interview process prior to being offered employment and/or a volunteer placement.
- TBS has created an interview process which is consistent and legally compliant.
- All interviewers will be trained in this process and guidelines created by TBS.
- The process for the selection process will vary between positions based on the information needed and the level of risk associated with each position.
- Interviewers must at some point in the interview process explain the various checks that the organization performs based on the risk assessment done for each position and determine if the candidate has any concerns they would like addressed.
- TBS requires detailed reference checks for all program personnel. All written and oral offers will be conditional on a successful reference check.
- TBS will always inform the candidate of all checks that will be performed. The candidate will also be informed of how the information will be used and the confidentiality/record retention policies around gathering of information.

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## Criminal Background Checks

- Criminal Record and Vulnerable Sector Screening will be required for all program personnel who are deemed to be in a position where risk is present as determined by the risk assessment.
- Checks will be required after a conditional offer of employment or volunteer placement has been made.
- TBS will reimburse successful candidates for any costs associated with Criminal Record checks.
- If an employee, independent contractor and/or volunteer has been “flagged” during these checks, the offer of employment/volunteer placement may be revoked.
- All documents related to these checks will be held in confidence and will be filed according to TBS’s policies and procedures.

## Orientations and Training

- Once an employee, independent contractor and/or volunteer has successfully completed the recruitment and selection process they, will then participate in the orientation process (please refer to the Orientation Handbook).
- The orientation process will inform all program personnel of the unique challenges of working with a vulnerable population (i.e. children and youth) as well as the conduct and ethical standards guidelines specific to the role.
- TBS will ensure that all program personnel have a chance to review all pertinent policies and procedures and will ensure that all information is appropriate and relevant to the tasks in which the individual will participate.
- All program personnel will receive training for the specific position on the job as well as through more formal means.
- Employees, independent contractors and/or volunteers of TBS will continue to participate in training programs throughout their course of employment/engagement.
- Detailed records will be kept of all orientation and training practices, these records will be handled and stored according to governmental regulations.

## Supervision and Evaluation

- Supervision is essential for positions where there is direct contact with vulnerable persons.
- The level of supervision required will directly relate to the level of risk uncovered by the risk assessment and outline in the position description.

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- All individuals will be made aware of who their direct supervisor is and how they can be contacted.
- All supervisors will be trained to detect, report and appropriately handle any misconduct.
- All program personnel will receive regular performance reviews/feedback, which will be conducted using TBS's written practices.
- All misconduct will be addressed using our progressive discipline steps.
- All employees, independent contractors and/or volunteers will participate in a probationary period of (3) months in which they will be monitored at a higher level.
- A probationary period may be re-established if the position changes, to reflect that positions level of risk.

### Participant Involvement

- Input from program participants may be used in the evaluation of program personnel.
- Participants will be encouraged to report any incidents. All participant complaints will be taken seriously and will follow our complaint/incident reporting procedures.

### Reviews

The Board of Directors shall review this Policy regularly to ensure that these measures are still sufficient.