Momiji Respect, Dignity and Independence for Our Seniors	<b>Developer:</b> Director of Finance	Category: Operations	Domain: Human Resources	Policy #: OPS-GA-HR-4.23
	Effective Date: January 2019	Subject Title: Vulnerable Persons Protection		Approval: Executive Director
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### Intent

Momiji 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 volunteers and employees we aim to minimize any potential dangers which our participants may face. This policy is to be used in conjunction with other company policies and procedures and is in no way a standalone document.

#### **Definitions**

Risk – Risk as defined in this document is specific to the danger which program participants may face as at the hands of volunteers or employees 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

Momiji will conduct a detailed risk assessment to determine the level of risk associated with each position including both paid and 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.

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 description will be written in order to ensure that screening methods are consistent.
- With defined job responsibilities Momiji will be able to provide a clear and accurate picture of what the job will entail.
- These recruitment guidelines shall also be communicated to anyone interested in becoming a volunteer or working for Momiji through the use of an information package.
- All volunteers or employees will be asked to fill out a standard application form with areas for signatures and dates as well as a statement which outlines:
- 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 relationship if information is falsified;
- The need for Police Checks for most positions; and
- That flagged 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 employees and identified volunteers must participate in the interview process prior to being offered a position.
- Momiji has created an interview process which is consistent and legally compliant.
- All interviewers will be trained in this process and guidelines created by Momiji.
- The process for the selection process will vary between positions based on the information needed and the level of risk associated with the 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.
- Momiji requires detailed reference checks for all employees and volunteers. All written and oral offers will be conditional on a successful reference check.
- Momiji 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.

## **Record Checks**

- Criminal Record and Vulnerable Sector Screening will be performed on all employees who
  are deemed to be in a position where risk is present as determined by the risk assessment.
- Checks will only be performed after a conditional offer of employment has been made.
- Employees will be responsible for paying the fees associated with record checks.
- If an employee or volunteer has been "flagged" during these checks, the offer of employment may be revoked.
- All documents related to these checks will be held in confidence and will be filed according
  to Momiji's policies and procedures.

# Orientations and Training

- Once an employee or volunteer has successfully completed the recruitment and selection process they will then participate in the orientation process.
- The orientation process will inform all volunteers and employees of the unique challenges of working with a vulnerable person as well as the conduct and ethical standards guidelines specific to the role.
- Momiji will ensure that all volunteers and employees 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 employee will participate.
- All employees and volunteers will also be trained for the specific position on the job as well as through more formal means.
- Employees and volunteers of Momiji will continue to participate in training programs throughout their course of employment.
- 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 client contact.
- The level of supervision required will directly relate to the level of risk uncovered by the risk assessment and outline in the position description.
- 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.
- Employees will receive regular performance reviews, which will be conducted using Momiji written practices.

- All misconduct will be addressed using our progressive discipline steps.
- All employees and 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.

## Reviews

Momiji will review this policy (annually) to ensure that these measures are still sufficient.