

As discussed at the June 23, 2015 FARM Committee meeting, attached please find a new guideline titled Recruitment and Due Diligence. The discussion took place as a result of a situation in early June relating to the background of a recently hired temporary IT staff member. The guideline was created to reinforce Waterfront Toronto's recruitment, selection and screening process by including background checks for designated departments while still ensuring employment practices conform to legislation under the Ontario Human Rights Code. In Ontario, under the Human Rights Code and as advised by our external legal counsel, an employer cannot discriminate on the basis of a criminal record. Criminal background checks should only be requested of individuals where there is a reasonable and bona fide requirement because of the nature of the job (ex. dealing with sensitive information and money management) being applied for and employers must be careful that the information does not reveal protected human rights information.

Therefore, in addition to our other pre-employment screening tools and as an effective risk-mitigation tool going forward, Basic Criminal Background Checks will be conducted for candidates applying for positions in our Accounting, Finance & Enterprise Risk Management, and Information Technology departments. Candidates for these roles will be required to provide a background check or provide Waterfront Toronto with written consent to obtain the background check. Offers of employment for these roles are conditional upon a satisfactory background check conducted by a third party. Management has also discussed and agreed that the requirement for a background check does not apply to existing employees.



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HR Guideline: Recruitment & Due Diligence	Guideline #: 34
Effective Date: October 2015	Approved by:  <hr/> Marisa Piattelli, CAO

Guideline

Waterfront Toronto requires the best qualified and capable staff to fulfill its mandate and business objectives with a high performing, skilled, diverse and engaged workforce. In order to select the best candidates for employment a number of recruitment, selection and screening tools, including employment reference checks are required as part of the hiring process for all roles. Certain designated roles will require a background check as a condition of employment.

Waterfront Toronto believes in equal opportunity in employment practices without discrimination on the grounds of race, religious beliefs, colour, gender, sexual orientation, physical disability, mental disability, ancestry, place of origin, age, marital status, source of income or family status.

A recruitment and selection guideline has been developed to ensure the organization fills vacancies with the most suitable candidate.

Application

This guideline is applicable to all job applicants applying to positions at Waterfront Toronto.

Responsibility

Human Resources is responsible for ensuring employment practices conform to legislation under the Ontario Human Rights Code. Department Management is responsible for candidate selection decisions.

Guiding Principles and Restrictions

- Internal candidates who apply in writing for vacancies will receive an interview
- Recruitment activities may be conducted externally
- One or more employment interviews will be conducted before making a conditional offer of employment
- Employment tests may be conducted before making an offer of employment
- All candidates participating in an interview will be notified of the results
- Education and employment history verification will be conducted before making a firm offer of employment
- Two or preferably three reference checks will also be conducted before making a firm offer of employment
- A copy of the job description will be provided to new employees

Employment offers

Offers will be provided in writing and include all terms of employment including: job title, start date, hours of work, annual compensation, vacation entitlement and eligibility for benefits. All employees of Waterfront Toronto will be required to read and sign a Code of Conduct and Conflict of Interest Procedures guideline.

Background Check Conditions

In Ontario, under the Ontario Human Rights Code, an employer cannot discriminate on the basis of a criminal record. Criminal background checks should only be requested of individuals where there is a reasonable and bona fide requirement because of the nature of the job being applied for. When requesting background checks, an employer must be careful that the information does not reveal protected human rights information.

Therefore, in addition to other pre-employment screening tools and as an effective risk-mitigation tool that will help screen "inappropriate" candidates and keep assets safe, Basic Criminal Background Check ("background check") will be conducted for designated department that deal with sensitive information and money management. This type of background check is generally the least intrusive level of checks and simply provides a pass/fail or cleared/not cleared response.

Going forward, all roles in our Accounting, Finance and Enterprise Risk Management and Information Technology departments, have been designated as having a requirement for a background check as a condition of employment. Candidates for these roles will be required to provide a background check to Waterfront Toronto or provide written consent to obtain the background check prior to the commencement of their employment.

Offers of employment for roles in the designated departments are conditional upon a satisfactory background check conducted by a third party. Two pieces of government issued identification (one piece with photo identification) will be required. No candidate for a role in one of the designated departments shall receive a firm offer of employment until a background check report has been received, reviewed and approved by the Director of Human Resources. If a candidate for a role in the designated departments refuses to provide a background check or provide written consent to obtain the background check he/she will no longer be eligible for the position.

The requirement for a Background Check does not apply to existing employees in a designated position, or in a position which becomes designated at a later date.

Candidates applying for positions subject to this guideline will be advised of the requirement for a background check should they be the successful candidate.

Waterfront Toronto will pay for the cost of background checks administered by Human Resources for any role in the designated departments.

Confidentiality of Information

Any information collected with respect to background checks will be maintained with Human Resources in a secure manner for the duration of the candidate's employment. This information is confidential and will be maintained in a separate file from the candidate's official employee file. Once a candidate's employment is terminated, all information obtained through the background check will be destroyed.