

Title: Police Record Checks (PRCs)

Adopted: April 19, 2005

Effective: April 19, 2005

Amended/Reviewed: April 21, 2026

This procedure must be interpreted, applied, and implemented in ways that uphold Indigenous and human rights and responsibilities, promote accessibility, and prevent and address (and do not reinforce) discrimination/discriminatory barriers.

1.0 RATIONALE

This Procedure establishes the operational process for collecting, reviewing, adjudicating, and retaining Police Record Checks (PRCs) and offence declarations in accordance with Ontario Regulation 521/01 (as amended according to Ontario Regulation 298/25) and the Police Record Checks Policy.

This Procedure supports student safety, risk mitigation, and legislative compliance while ensuring that implementation aligns with Indigenous rights, human rights, privacy, and procedural fairness principles.

2.0 DEFINITIONS

- 2.1 Criminal Record and Judicial Matters Check (CRJMC):** Required for employees and other individuals who will have regular contact with students but will not be in a position of trust or authority.
- 2.2 Vulnerable Sector Check (VSC):** Required for employees and other individuals who will be in a position of trust or authority in relation to students.
- 2.3 Vulnerable Person:** A person who, due to age, disability, or other circumstances, whether temporary or permanent, is in a position of dependence or at greater risk of harm from someone in a position of authority or trust.
- 2.4 Offence Declaration:** A written declaration signed by an individual listing all Criminal Code (Canada) convictions not previously disclosed to the Board and for which a pardon has not been granted.
- 2.5 Police Record Check (PRC):** Also known as a “background check” is a search of police records on an individual conducted in accordance with the Police Record Checks Reform Act, 2015. These checks are often used as part of a screening process for paid work, employment, student placement or volunteering. Police Record Checks mitigate risks associated with those working with the vulnerable sector.

The Act authorizes the following types of police record checks:

- Criminal Record Check
- Criminal Record and Judicial Matters Check
- Vulnerable Sector Check

2.6 Service Provider: An individual who comes into direct and regular contact with students while providing goods or services at a school site of the Board under contract; or for their employer who provides goods or services and is under contract with the Board.

3.0 RESPONSIBILITY

The Superintendent of People and Culture has carriage and oversight over this policy and is responsible for the content, implementation, and communication of this policy.

Operational responsibility for record collection, storage, and compliance monitoring is delegated to:

- The Superintendent of People and Culture for employees and teacher candidates;
- Principals and Department Managers for volunteers and students on placement with the board;
- The Purchasing Department for service providers

All delegated authorities shall ensure compliance with legislative requirements and Board policies.

All records shall be collected, stored, and monitored in accordance with the Board's Records and Information Management (RIM) processes, retention schedules, and information governance requirements.

4.0 APPLICATION AND SCOPE

This Procedure applies to:

- All DDSB employees;
- Volunteers;
- Students on educational placements with the board;
- Service providers who have regular contact with students.

Compliance with this Procedure is a condition of employment, volunteer engagement, placement, or service provision where applicable.

5.0 PROCEDURES

5.1 General Requirements

5.1.1 Individuals required to provide a Police Record Check must do so at their own expense.

5.1.2 The type of check required depends on whether the individual is in a position of trust or authority in relation to students:

- A. Vulnerable Sector Check (VSC) – required for individuals in positions of trust or authority in relation to students
- B. Criminal Record and Judicial Matters Check (CRJMC) – required for individuals who do not hold a position of trust or authority in relation to students

5.1.3 Police Record Checks must not be older than six (6) months at time of submission.

5.1.4 Police Record Checks are required upon commencement and on a five-year cycle thereafter.

5.1.5 In years when a PRC is not collected, an annual offence declaration is required.

5.1.6 If an individual is charged with or convicted of a Criminal Code offence, the individual must notify the Superintendent of People and Culture or designate as soon as reasonably possible, and a new PRC shall be collected.

5.1.7 All Police Record Checks must be deemed satisfactory at the discretion of the Board.

5.2 Employees

5.2.1 All new employees must provide a satisfactory PRC prior to assuming duties. employment offers are conditional upon submission.

5.2.2 Employment may commence prior to receipt of a PRC where:

- A. An offence declaration is submitted; and
- B. Proof of PRC application is provided;

5.2.3 PRCs for employees shall be reviewed by the Superintendent of People and Culture or designate.

5.2.4 Employee submission deadlines shall align with the Board's established collection schedule, including the birth-month cycle as communicated by People and Culture.

5.3 Adjudication

5.3.1 The Superintendent of People and Culture oversees review and adjudication.

5.3.2 Indigenous rights, human rights, and anti-discrimination principles shall guide review.

5.3.3 In determining appropriate action, the Board may consider:

- A. Connection to duties
- B. Time elapsed
- C. Indigenous rights and human rights considerations
- D. Nature of offence (violence, sexual activity, dishonesty, hate activity)
- E. Employment history
- F. Remorse and rehabilitation
- G. Likelihood of recurrence
- H. Cooperation
- I. Relevance to Education Act or professional standards
- J. Student Protection Act obligations
- K. Any other mitigating factors

5.3.4 The Superintendent determines appropriate action, including discipline or withdrawal of offer, termination of contract, or denial of access as applicable.

5.3.5 Where applicable, employees may be advised of their right to union, federation, or association representation in accordance with applicable collective agreements.

5.4 Requirements for Service Providers

5.4.1 Service providers with regular and direct student contact must provide a PRC as a condition of contract. Service providers are subject to the collection cycles outlined in section 5.1.4 and 5.1.5.

5.4.2 Responsibility for compliance rests with the contracting Principal, Superintendent, or Department Manager in coordination with Purchasing.

5.4.3 PRCs shall be centrally collected and maintained by Purchasing.

5.4.4 Non-compliance results in suspension or termination of services.

5.5 Requirements for Students on Placement with the Board

5.5.1 Students on placement with the board must provide a PRC prior to commencement and are subject to the collection cycle outlined in section 5.1.4.

5.5.2 Compliance oversight rests with the Superintendent of People and Culture (teacher candidates) or the Principal/Department Manager.

5.5.3 Non-compliance results in inability to commence or continue placement with the board.

5.6 Requirements for Volunteers

5.6.1 Volunteers must provide a PRC prior to commencing volunteer activities.

5.6.2 Compliance oversight rests with the Principal or Department Manager.

5.6.3 PRCs shall be maintained in a secure, Board-approved location at the school or department, with access restricted to authorized staff.

5.6.4 Non-compliance may result in denial of school access.

5.7 Retention and Confidentiality

5.7.1 PRCs and offence declarations shall be stored securely and separately from personnel files.

5.7.2 Access to these records shall be limited to authorized staff whose duties require it.

5.7.3 These records shall be retained and disposed of in accordance with applicable legislation, the DDSB Records Retention and Classification Schedule (RRCS), and the Records and Information Management Procedure (PR GOV 10-01).

5.8 Monitoring

The Superintendent of People and Culture shall establish mechanisms to monitor compliance with this Procedure, including tracking submission cycles, offence declarations, adjudication processes, and related privacy and records management requirements.

6.0 COMMUNICATION

This Procedure shall be published in an accessible format on the DDSB website and communicated to employees, volunteers, service providers, and placement institutions as appropriate.

7.0 APPENDICES

None.

8.0 REFERENCE DOCUMENTS

- Police Record Check Policy
- Trustees Criminal Reference Checks
- Indigenous Education Policy
- Human Rights, Anti-Discrimination and Anti-Racism Policy
- Safe and Respectful Workplace and Harassment Prevention Policy
- Volunteer Programs in Schools Procedure
- Education Act
- Ontario Regulation 521/01
- Police Record Checks Reform Act, 2015
- Privacy Policy
- Records and Information Management Policy
- Records and Information Management Procedure