



Police Record Checks for all Employees and Volunteers

GNAG's Odyssey Tykes summer program requires that all employees and students over the age of eighteen must obtain a vulnerable sector check that includes a criminal reference check prior to commencing employment and interacting with the children. A Department Manager or Senior Coordinator must see the original document, and will keep a true copy (in hard or digital format) in the individual's file.

Under the Child Care and Early Years Act, 2014 (CCEYA), all individuals in full-time or part-time employment, volunteer positions and student placements will be required to complete an annual Criminal Offence Declaration (COD) and updates to the Vulnerable Sector Check (VSC) every five years. The Criminal Offence Declaration (COD) is to be signed by all individuals and submitted to the department Manager/Supervisor annually no later than 15 days after the anniversary date of the previous VSC or COD. A false declaration may be grounds for dismissal. A Criminal Offence Declaration is not required during the year following a VSC being obtained.

The Vulnerable Sector Check must be conducted by a police force. Third party companies conducting criminal reference checks are not permitted. Any payment required will be the responsibility of the applicant. To be acceptable, a Vulnerable Sector Check must be dated no earlier than six months prior to the date it is submitted to GNAG by the applicant. Program volunteers may submit a VSC dated within the previous five years.

Volunteers under 18 years of age are not legally required to provide a VSC, as the police services prohibits minors from obtaining this form of documentation. Volunteers under the age of eighteen will be required to complete a Criminal Offence Declaration form on an annual basis. Should a volunteer reach the age of eighteen during their volunteer tenure, they will be required to obtain a VSC as soon as possible.

Exclusion of Applicants

GNAG understands its obligation to the Ontario Human Rights Code, which prohibits discrimination against an individual for purposes of employment by reason of a pardoned Criminal Code conviction or a standing conviction for a provincial offence. The Centre will not discriminate against an individual in this situation, unless there is a bona fide reason related explicitly to the position being applied for, and with due consideration given to the need to accommodate applicants where possible.

Individuals with the following outstanding Criminal Code convictions shall not be permitted to provide child care, including:

- Sexual interference
- Child pornography
- Duty of persons to provide necessities (child neglect)
- Murder
- Infanticide

Or, if the individual has been found guilty of Professional misconduct under the Early Childhood Educators Act where the individual's membership to the College of ECEs has been revoked and not readmitted or reissued; or the individual's authority to practice has been restricted in any way.

Confidentiality

To guard the confidentiality of personal information, the following policies will apply:

1. A true copy of the vulnerable sector check (in hard copy or digital format) will be kept in the individual's personnel file in a locked cabinet for the duration of the applicant's employment / placement with GNAG and will only be accessible by Management.
2. All true copies (hard copy or digital format) of Vulnerable Sector Check of unsuccessful applicants will be immediately destroyed.
3. All true copies (hard copy or digital format) of Vulnerable Sector Check for staff no longer employed or students/volunteers, whose placement has ceased, will be kept on file for 5 years and then destroyed.

Conditional Employment

Conditional job offers may be necessary during the time it takes to obtain the Vulnerable Sector Check. Individuals that produce a receipt for their Vulnerable Sector Check may be allowed to start their position or volunteer immediately. In the interim, staff will fill out an Offence Declaration form to be kept on file. These individuals will at no time be permitted to be alone with the children until the VSC has been reviewed by the Department Manager/Senior Coordinator. If within four weeks from the date on the Vulnerable Sector Check receipt, a copy of the original VSC has not been submitted to the Executive Director/Supervisor, privileges will be severed until a Vulnerable Sector Check has been produced.

Break In Employment

A new VSC will need to be provided after any break in the relationship with the licensee that has lasted 6 or more months before the relationship resumes and after any break less than 6 months if an updated VSC would have been required during the break.

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