

POLICY 3.04	Criminal Record Check	DOMAIN People and Teams
<b>ELT Sponsor:</b> Chief People, Strategy and Technology Officer  <b>Policy Lead(s):</b> Corporate Director, Talent Acquisition and HR Client Partners	<b>Date Approved:</b> July 22, 2025	
	<b>Date Effective:</b> July 23, 2025	
	<b>Date of Next Review:</b> July 2028	

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NOTE: The first appearance of terms in bold in the body of this document (except titles) are defined terms – please refer to the Definition section

## Policy Statement:

Covenant Health is committed to maintaining a safe and secure environment for those we serve. As such, **criminal record checks** (CRCs) are conducted in accordance with applicable legislation and regulatory requirement to ensure the safety and well-being of those entrusted to our care.

## Purpose Statement:

- To outline the general and procedural requirements related to Criminal Record Checks (CRC) for employees, **volunteers**, and **contractors**.
- To support consistent application of CRC standards in alignment with organizational and regulatory requirements.
- To inform managers and staff of their responsibilities regarding CRC compliance and disclosures.

## Applicability:

This policy applies to all Covenant Health representatives, including but not limited to: prospective employees, current employees, board members, paymaster employees, volunteers, applicants, contracted service providers, etc. A collective agreement or other employment contract shall take precedence in the case of a conflict with this policy, except where the application of legislation supersedes.

## Responsibility:

Covenant Health **hiring managers** are responsible for initiating Criminal Record Check (CRC) requests for successful candidates and ensuring that no work—including training or orientation—commences until the CRC, including a **Vulnerable Sector Declaration** if applicable, has been validated and confirmed as **satisfactory** by HR Shared Services (HRSS). Talent Acquisition (for employees) and Volunteer Services (for volunteers) will track CRC submissions as part of the onboarding process.

## Principles:

- 1.0** Covenant Health is committed to protecting the personal information obtained through criminal record checks in accordance with legislation and Covenant Health policies.
- 2.0** Covenant Health is committed to providing a safe and secure environment for staff,

patients/residents and visitors by ensuring all employees, volunteers and contractors undergo the level of security screening as required by their role.

### Definitions:

**Contractor** means any affiliate, third party, non-employee, consultant, or agent or employee to the contractor, outsourcer, service provider, contract provider or business partner engaged by Covenant Health to perform services for or on behalf of Covenant Health.

**Criminal Record Check (CRC)** means a document which verifies - based on a search of records held in local, regional and/or national law enforcement databases - whether an individual has a criminal record, providing the applicant with the detailed information that can be legally disclosed.

**Hiring Manager** means the management individual who has hiring authority for the position; in most cases, the individual the position directly reports to.

**Police Information Check (PIC)** is another term for Criminal Record Check (CRC); the terms may be used interchangeably in this policy.

**Satisfactory Criminal Record Check (CRC)** means any level of valid criminal record check, which may include a Vulnerable Sector Declaration and/or an enhanced check, which meets the requirements for the position the prospective employee has been offered.

**Volunteer** means anyone who performs a task at the direction of and on behalf of Covenant Health without receiving payment.

**Vulnerable Sector Declaration** means signed and witnessed statement indicating whether the Covenant Health representative has a criminal record, as well as any record suspensions (formerly pardons) for sexual offences. The declarant attests that the information provided is true. Should Covenant Health find the information provided to be falsified, Covenant Health reserves the right to review the employment relationship and take the appropriate steps.

### Relevant Covenant Health Policy and Policy Support Documents:

<b>A.</b>	<b>Policies:</b> II-95 <a href="#">Recruitment (Posting, Selection and Hiring)</a>
<b>B.</b>	<b>Procedures:</b> 3.04.PROC.1 <a href="#">Procedure for Facilitating a Criminal Record Check</a>
<b>C.</b>	<b>Guidelines:</b>
<b>D.</b>	<b>Job aids:</b> 3.04.JOBAID.1 <a href="#">Statutory Declaration Form - Acute Care</a> 3.04.JOBAID.1 <a href="#">Statutory Declaration Form - Youth</a>

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<b>E.</b>	<b>Standards:</b>
<b>Keywords:</b> Police information check	
<b>References:</b> <ul style="list-style-type: none"> <li>• Protection of Persons in Care Act – Criminal Records Check - <a href="https://www.alberta.ca/protection-for-persons-in-care">https://www.alberta.ca/protection-for-persons-in-care</a></li> <li>• Criminal Records Act <a href="http://laws.justice.gc.ca/PDF/C-47.pdf">http://laws.justice.gc.ca/PDF/C-47.pdf</a></li> <li>• Edmonton Police Service – <a href="#">Police Information Check Section</a></li> <li>• Royal Canadian Mounted Police – <a href="#">Criminal Record Checks</a></li> <li>• Continuing Care Health Services Standards – 2024 <a href="#">Continuing care health service standards - Open Government</a></li> <li>• Public Safety Canada – The Screening Handbook – 2012 Edition <a href="#">The Screening Handbook 2012 Edition</a></li> </ul>	
<b>Past Revisions:</b> September 27, 2017 – <i>previously numbered II-16</i> November 8, 2013 July 5, 2010	