

**CIRCULAR**

**Date:** April 23, 2020

**CIRCULAR NUMBER:** COVID-19: 2020-72

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**To:** Program areas and service providers funded by the Department of Families for the delivery of Child and Family Services (CFS), Community Living disABILITY Services (CLDS), Early Learning and Child Care (ELCC), and Manitoba Housing

**Subject:** **COVID-19 Criminal Record Checks**

**Program(s):** All

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**Type:**  Policy  For Internal Reference Only  
 Procedure  Information Only

**Effective Date** Immediately

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**Topic: Use of Criminal Record Checks for individuals working with clientele in Child and Family Services, Community Living disABILITY Services, Early Learning and Child Care, and Manitoba Housing**

Criminal Record Checks (CRCs) are required for those who work or volunteer with children in the care of CFS agencies, participants funded by the CLDS program, children in child care, or tenants of Manitoba Housing. This includes the following:

**CLDS**

- Any person who provides day services supports and/or transportation services to participants funded by CLDS.
- Service providers, persons providing residential care and adults residing in a residential care facility, other than residents.

**CFS**

- Any person who provides work or services to an agency, whether as an employee, volunteer, student trainee or in any other way, or any person who applies or proposes to provide such work or services to an agency.

**ELCC**

- Any licensee, applicant for employment or volunteer in a licensed child care facility.
- Any adult person who resides in a licensed family child care home.

**Manitoba Housing**

- Any staff member or other person who provides services at occupied Manitoba Housing premises.
- All officers, employees, subcontractors, or agents of companies delivery services at occupied Manitoba Housing premises.

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## Screening Expectations

Services provided through CFS, CLDS, ELCC or Manitoba Housing **must continue to conduct CRC screening** when bringing on personnel.

CRCs are an essential tool for ensuring the safety of vulnerable Manitobans. A full CRC includes a vulnerable sector check, which is used to determine the possible existence of a criminal record and/or a sexual offence conviction for which an individual has received a pardon.

CRCs are usually obtained through the Winnipeg Police Service, Brandon Police Service, RCMP or Commissionaires.

The Department of Justice is also able to conduct a Criminal Background Check, consisting of a scan of Justice databases and a superficial social-media check for significant flags. It is limited only to Manitoba information and would not capture criminal information from any other parts of Canada.

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## Adapting to Reduced Service During the Pandemic Period

During the period of the COVID-19 Pandemic, agencies that previously conducted CRCs may modify or cease their service. In the event of such changes, the following procedures should be followed.

### For agencies or facilities in Winnipeg

- The Winnipeg Police Service are still able to conduct CRCs, including vulnerable sector checks, through their [online portal](#). This is the preferred approach when dealing with residents of Winnipeg.
- Commissionaires are able to accept [online applications](#) for criminal record checks but are not able to conduct vulnerable sector checks.

### For agencies or facilities outside of Winnipeg

- The Brandon Police Service has suspended CRCs.
- Commissionaires are able to accept [online applications](#) for criminal record checks but are not able to conduct vulnerable sector checks.
- Vulnerable sector checks would typically have been available through the local RCMP detachment. However, in many communities detachments are closed to the public.

In the event that a full CRC (including a vulnerable sector check) is not available, the Department of Justice's Criminal Background Check may be used as an interim measure until a full CRC can be obtained. **A full CRC is still required and expected as soon as practically possible.**

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## If a Department of Justice Criminal Background Check (CBC) is used

1. Agencies, facilities and staff must be fully aware that a CBC would only capture information from within Manitoba. It is up to the agency or facility to decide whether or not to assume the risk of using a CBC.

2. Only agency or facility staff should submit a request for a CBC screening. A member of the public should not be requesting this screening.
3. Any applicant being considered for a CBC screening should be asked **whether they have resided in Manitoba for their entire life.**
  - If the answer is yes, a CBC is a reasonably accurate interim tool.
  - If the answer is no, agencies or facilities should carefully consider the risk related to bringing on a person for whom a CBC is likely to be incomplete. In such cases, the agency or facility may wish to take additional steps such as:
    - Adding screening questions (length of time outside of Manitoba, occupation/location) and additional reference checks
    - Limiting the activities the new personnel is involved in until a full CRC can be completed.
4. When requesting a CBC screening, the following information should be included:
  - Full legal name of applicant, including maiden or alternate names where applicable
  - Date of Birth
  - Address
  - Phone number
  - Email address
  - Copy of photo ID (if possible)
5. If an agency wishes to conduct a CBC, they should contact  
**Karin Johnson**  
Manager – Security Screening  
Security and Intelligence Branch  
Manitoba Justice  
[Karin.Johnson@gov.mb.ca](mailto:Karin.Johnson@gov.mb.ca)  
204-945-7544

Thank you for your cooperation.

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