



December 18, 2025

Hon. Michael Kerzner
Ministry of the Solicitor General
Community Safety and Animal Welfare Policy
25 Grosvenor Street, 9th Floor
Toronto, ON M7A 1Y6

Re: Response to Regulatory Proposal 52613 - Proposed Legislative Amendments to the Police Record Checks Reform Act, 2015 (PRCRA)

Dear Minister Kerzner,

We are writing to provide feedback on the proposed legislative amendments to the Police Record Checks Reform Act. Affordable, timely, consistent and streamlined police record checks are critical for onboarding staff and reducing barriers of volunteering for nonprofits and charitable organizations in Ontario. Ontario Nonprofit Network (ONN) supports the establishment of clear, province-wide service standards for police record checks. This is a step in the right direction and builds on previous progress to modernize police record checks, making it easier for Ontarians to volunteer for their communities. We encourage the government to focus on addressing issues around timelines, clarity, consistency, and affordability through the prescription of police record check service standards.

Summary of recommendations

1. Establish a 1-2 week service standard for all police record checks.
2. Create enabling conditions to help police record check providers meet service standards by providing adequate operational resources.
3. Launch a public guideline to:
 - a. Provide better clarification regarding the appropriate use of Criminal Record Checks (level I); Criminal Record and Judicial Matters Checks (level II); Vulnerable Sector Checks (level III), and Broad Record Checks for nonprofits and charities who engage volunteers and employees to better understand when to use which level of police record check, and if other methods can be used to effectively assess risk management.
 - b. Increase awareness of the appropriate use of police record checks and its impact on nonprofits' volunteers and employees among other relevant parties, such as businesses, employers, police services, and the insurance sector.
4. Include free level III (Vulnerable Sector) checks for volunteers as soon as possible, with support for police services to offset potential revenue loss.



Staffing and volunteer challenges is a critical issue that is top of mind for nonprofits and charities in Ontario. According to the most recent ONN [State of the Sector](#) survey report, over half (52 per cent) of organizations reported having trouble recruiting and retaining staff. Forty two per cent of organizations also reported challenges in recruiting and retaining volunteers. As a result, over six in ten organizations (62 per cent) have had to scale back their programs and services.

Timely, consistent, and affordable police record checks are vital for onboarding nonprofit staff and volunteers who deliver critical services to Ontarians. Nonprofits use police record checks in their screening process for volunteers and employees, especially for those who will be working with vulnerable populations, such as children, seniors, and people living with disabilities. Long processing times, inconsistency in services, and high fees can exacerbate the recruitment and retention challenge of nonprofit staff and volunteers, leading to delayed or reduced programs and services.

There are three main issues related to police record checks that can be addressed through the establishment of police record checks service standards:

1. Timeline concerns

Currently, it takes the majority of nonprofits 1-2 months for their volunteers to receive police record checks. As a result of long processing times, many volunteers abandon their applications while waiting for their police record checks. This issue is becoming more prominent as short term volunteering becomes more prevalent, which requires quicker turnaround. For example, students, who have limited time to volunteer in the summer before classes start in the fall, only have about two months to volunteer. If the police record checks take two months to be processed, it leaves no time for these students to volunteer after they receive the results of their police record checks. For post-secondary students with longer summer breaks (May to August), long police record check processing times can negatively impact their training opportunities. This is particularly true for those studying to become social workers, child care workers, and other human service professionals. When police record checks are delayed, students are unable to engage in direct client work for extended periods, disrupting learning outcomes. Improving processing timelines is essential to sustaining the workforce pipeline needed to meet service demand. Long processing timeframes also impact nonprofit workers in a similar way, where qualified candidates withdraw from the hiring processes while waiting for their police record checks. To avoid delayed or reduced services, and the loss of qualified staff and volunteers, we recommend a processing timeframe of 1-2 weeks. Service standards around processing time must be paired with adequate resources to enable police services to meet the standard. Without concurrent operational support, service standards alone will not improve the timeframe issue.

2. Clarification on the different types of police record checks

There is a lack of clear understanding of when to use which level of police record checks among employers, police services, and insurance providers. For instance, under the Criminal Records Act (6.3(3)), police are only allowed to do vulnerable sector checks (VSCs) for positions that involve “direct trust or authority over vulnerable persons.” Many nonprofits are not aware of this requirement. Confusion also exists around the definition of “position that involves direct trust or authority over vulnerable persons,” both among nonprofits and local police services. Insurance policies are also increasingly requiring organizations to request VSCs for all volunteers, even when the role does not meet the legal threshold of working in direct trust or authority with vulnerable persons. This puts organizations in an untenable position, caught between insurance requirements on one side and police services refusing VSC requests that do not meet legislative criteria on the other. The establishment of service standards should include a clear guideline for nonprofits, employers, insurers, and police services on the appropriate use of each level of police record checks.

3. Inconsistent and prohibitive fees for vulnerable sector checks

Fees associated with police record checks can be prohibitive, particularly for vulnerable sector checks. VSCs include carefully screened information about non-conviction information and make up 80 per cent of all checks run by municipal police services. For most jurisdictions in Ontario, there is a fee for vulnerable sector checks, which varies by region and can be anywhere between \$10-\$50. This fee deters many people from volunteering, especially people with low income, newcomers, and youth. Nonprofits have reported this as a huge contributing factor to nonprofits having difficulties recruiting youth volunteers. Although some nonprofits are able to reimburse volunteers for this cost, this adds additional financial burden to nonprofits who are already stretched thin with limited resources. With the passage of [Bill 13, Supporting People and Businesses Act 2021](#), both level I and II police record checks have become free to make it easier for people to become volunteers. Making level III (Vulnerable Sector) checks free for volunteers will further lower the barriers for volunteering.

Conclusion

Setting police record check service standards can streamline the police record check processes and address fees and timeline issues. This would not only reduce barriers to help make it easier for Ontarians to volunteer and work for nonprofits, but could also help ease the burden on police record check providers. We welcome the opportunity to meet with your Ministry at your earliest convenience to discuss how ONN and our network can partner with your office in the establishment of police record check service standards.



Sincerely,

A handwritten signature in black ink, appearing to read "P. Sandhu", is positioned below the word "Sincerely,".

Pamela Uppal-Sandhu
Co-Executive Director (Interim), Director of Policy
Ontario Nonprofit Network

About ONN

ONN is the independent nonprofit network for the 58,000 nonprofits in Ontario, focused on policy, advocacy, and services to strengthen Ontario's nonprofit sector as a key pillar of our society and economy. ONN works to create a public policy environment that allows nonprofits and charities to thrive.