



Criminal Record Check Policy Statement and FAQs

In this document, unless the context indicates otherwise, “member(s)” includes licensed pharmacist(s) and pharmacy technician(s).

The Code of Ethics of the Saskatchewan College of Pharmacy Professionals (‘SCPP’ or ‘the College’) states that a “member shall observe the law, particularly those affecting the practice of pharmacy; uphold the dignity of the Profession; strive for its betterment; maintain a high standard of ethics; and report to the proper authority, without fear or favour, any unethical or illegal conduct which may be encountered within the Profession.”

The mandate of the College is public protection. Other regulated professions, particularly health care professions, as well as the profession of pharmacy in other provinces have instituted more rigorous screening processes of their registrants as an added measure of protection for the public. This has included the implementation of criminal record checks. Effective April 1, 2020 and pursuant to Section 7 of PART C and Section 8 of PART D “Evidence of Character and Suitability to Practice” of the Regulatory Bylaws, all existing SCPP Practising and Non-Practising members seeking membership renewals, interns, and medical practitioners (who are registered as Licensed Pharmacists) are required to submit to an initial criminal record check and local police records check (collectively referred to as ‘CRC’) and a new CRC upon request as part of the random CRC auditing process.

New applicants for licensure, including temporary licensure, will be required to submit a CRC with their application for membership (at the beginning of the licensing process).

SCPP requires that members report any new charges or convictions of the *Criminal Code of Canada* or *Controlled Drugs and Substances Act* and any provincial offences relating to the sale of drugs as soon as reasonably possible, and not later than 30 days after the charge, offence, or conviction is made. Failure to report a new charge, offence or conviction could result in disciplinary action that could include the revocation of a member’s licence or the denial of a practising license to a candidate for membership.

The existence of a criminal record will not automatically result in the denial of an application to obtain or renew a licence. SCPP will consider the circumstances of any criminal record disclosed to determine whether the member or candidate for membership currently has the good character required of pharmacy professionals.

Why does SCPP require a CRC?

The reasons for requiring a CRC are as follows:

1. For the safety of the patients and other patrons of the pharmacy;
2. To maintain the public’s confidence in the Profession; and,

3. For the safety of all pharmacy personnel.

While a CRC is not a guarantee of ethical behaviour, it aids the College in assessing what risk, if any, a member/candidate poses to the public and to other pharmacy personnel and is a valuable tool in the deterrence of future unethical and illegal activity.

SCPP has determined that members/candidates for membership shall obtain an Enhanced Police Information Check (E-PIC) through the designated service provider*, which includes a search of local police data sources that will provide SCPP with information regarding outstanding charges, warrants, peace bonds and restraining orders, prohibitions, probation orders, interim release conditions, and recent convictions that are not yet listed in the RCMP National Repository of Criminal Records in addition to those convictions that are reported in the RCMP National Repository of Criminal Records. A standard CRC is a name-based search of the RCMP National Repository of Criminal Records only.

*Members/candidates who have charges or convictions on record, or members/candidates residing outside of Canada should contact the [SCPP Deputy Registrar](#) prior to completing an E-PIC through the designated service provider.

What happens if there are criminal charges or convictions reported in a criminal record check, disclosed by the member/candidate, or disclosed by a member of the public?

Criminal charges or convictions will be reviewed by the SCPP Registrar and/or Deputy Registrar and/or the SCPP Registration and Licensing Policies Committee at the Registrar's discretion. To facilitate an adequate assessment of the evidence of character and suitability to practise of the member/candidate, the office of the Deputy Registrar will require the member/candidate to provide additional information. The information requested may include, but is not limited to:

1. What is/are the conviction(s)/charge(s).
2. What is/are the date(s) of the conviction(s)/charge(s).
3. Were you considered "on duty" as a pharmacy professional or conducting business on behalf of the profession at the time of the offence (including delivering medications or providing pharmacy services outside of a permitted pharmacy)?
4. Were you on the premises of a pharmacy or facility in which pharmacy services are provided at the time of the offence?
5. What is the status of any court proceedings respecting the charge(s).
6. What sentence, fines, penalties, conditions, or restrictions were received as a result of the conviction(s)/charge(s).
7. Has an appeal process of the conviction(s)/charges(s) been initiated?
8. Is there any Court-mandated formal remediation completed/ongoing? (If yes, please describe the remediation completed/ongoing).
9. Are there any additional or voluntary formal remediation or corrective measures completed/ongoing? (If yes, please describe the remediation/corrective measures completed/ongoing).
10. Is there any information you wish to provide regarding the conviction(s)/charge(s) and corrective measures taken or supports in place to mitigate the risk of recidivism.

Additionally, the member/candidate for membership may be required to obtain the charge documents, court transcript or decision, or other documents reflecting the outcome of a criminal proceeding.

The additional information requested and provided by the member/candidate is then de-identified and presented to the SCPP Registration and Licensing Policies Committee to evaluate what risk, if any, the member or candidate may pose to their patients, to their colleagues, to the profession, and to themselves. The SCPP Registration and Licensing Policies Committee will then make a recommendation to the Registrar regarding licensure.

A member or candidate's failure to provide a thorough response to a request for additional information will require the SCPP Registration and Licensing Policies Committee to conduct a review and make a recommendation to the Registrar, which may include a recommendation to pursue collecting the additional information via an official complaint process.

The SCPP Registrar will determine to what extent, if any, the member's licence may be impacted due to the information provided in the CRC, the additional information provided, and based on the recommendations of the SCPP Registration and Licensing Policies Committee.

The Registrar reserves the right to request the SCPP Complaints Committee investigate the conduct of any member with charges or convictions on record that indicate the member poses a credible risk to the safety of their colleagues and/or patients.

Who views criminal record check information and where is it stored?

The SCPP registrations staff will review E-PICs upon their submission as part of the registrations process. All E-PICs and other CRC information submitted to SCPP will be kept confidential by the SCPP staff in adherence with [SCPP Privacy Policies](#). A copy of the E-PIC will be kept securely in the member's file.

Members/candidates with charges or convictions may confidentially report this information directly to the [SCPP Deputy Registrar](#).

When and how often do members need to provide an E-PIC to SCPP?

All new members must submit an E-PIC with their application for membership. All current members must submit a new E-PIC upon request and as part of the annual CRC auditing process. Members who are not part of the current-year CRC audit will be required to sign a declaration during licence renewal that the contents of the E-PIC have not changed.

SCPP will require 10 per cent of the membership to submit a new E-PIC on an annual basis, with each member presenting a new E-PIC once every 10 years. Additionally, a member may be required to submit a new E-PIC and/or submit to a review should the College become aware of any of the following:

- Criminal activity or convictions as reported to the SCPP office by a member of the public or a member of the College;

- Criminal activity or convictions as reported in the media;
- Criminal activity uncovered during the course of a complaint investigation by the SCPP office;
- Behaviour witnessed and reported to the SCPP office that provides the College with sufficient evidence to support the requirement of a new E-PIC; and/or,
- Other conduct or behavior which calls into question the moral character of the member.

Are students registering as interns (either through the U of S PharmD program or through Saskatchewan Polytechnic PhT program) required to submit an E-PIC with their registration?

No, the University of Saskatchewan and Saskatchewan Polytechnic have Memorandums of Understanding (MOU) with the College that allows the College to accept interns for registration without the submission of a new E-PIC because they have already provided a CRC to their educational institution. Graduates of these programs will be required to submit a new E-PIC to complete their registration and obtain a Practising or Non-Practising membership with SCPP.

How does a member/candidate obtain an E-PIC?

Members/candidates should refer to the [Criminal Record Checks](#) section of the SCPP website. More information on how to obtain an E-PIC will be provided by the SCPP registrations staff.

Members/candidates will need to provide two pieces of ID to obtain the E-PIC:

1. A photo ID that contains the member's/candidate's birthdate, such as a driver's licence, passport, a firearms licence, etc.; and
2. Another government issued ID that contains the member's/candidate's birthdate, such as a birth certificate or a health services card (not a SIN card).

Note: members/candidates who have criminal charges/convictions and those residing outside of Canada will be directed to their local police service for a CRC and should not complete an E-PIC through the designated service provider. Contact the [SCPP Deputy Registrar](#) for more information.

Is there a fee for obtaining an E-PIC?

Yes. The member/candidate is responsible for all fees associated with the procurement of the E-PIC. More information regarding fees for obtaining an E-PIC will be found in your registrations/renewal information.

How long does it take to obtain an E-PIC?

E-PICs obtained through the prescribed service provider may be processed by the provider within 24 hours.

On the rare occasion that a member/candidate is found to have the same name and date of birth as an individual with whom there are charges, convictions, or other notations in either the RCMP National Repository of Criminal Records or local police data sources (a “false positive”), the member would be referred to a fingerprinting service to obtain fingerprints for proof of identity.

How does a member/candidate submit an E-PIC to SCPP?

Detailed instructions on how to complete and submit the E-PIC will be included with your registration/renewal information and are available in the [Criminal Record Checks](#) section of the SCPP website.

What if a member/candidate already has a CRC or an E-PIC?

SCPP will only accept an E-PIC through the prescribed service provider or as otherwise directed by the College. Members/candidates who have completed an E-PIC through the designated service provider within the last six months should contact the [SCPP registrations department](#) before completing a new one.

SCPP will not accept an E-PIC that was conducted more than six months prior to the date SCPP requested it.

SCPP reserves the right to request a new E-PIC at any time if the College has reason to suspect the contents of the E-PIC may have changed.

What happens if a member/candidate falsifies an E-PIC or the yearly self-declaration?

If it is discovered that a member/candidate has altered or falsified his or her E-PIC or any criminal record check information in any way, or if the SCPP Registrar is provided with reason to believe that the member may have perjured the self-declaration that the contents of the E-PIC remain unchanged, the member will be investigated by the SCPP complaints department and may face disciplinary action that could include the revocation of his or her licence to practise and the candidate for membership may be denied a licence to practise in Saskatchewan.

Are members/candidates required to report new charges or criminal convictions?

Yes. As soon as reasonably possible, and **not more than 30 days from the date of any charge, offence, or conviction**, the member/candidate or member's/candidate's representative should contact the [SCPP Registrar](#) or [Deputy Registrar](#) to report the charge, offence, or conviction.

SCPP requests that members report to the Registrar any charges, offences, or convictions of the *Criminal Code of Canada*, or *Controlled Drugs and Substances Act* and any provincial offences relating to the sale of drugs as soon as reasonably possible. *Traffic Safety Act* offences (bylaw infractions, speeding tickets, etc.) do not require reporting. If you are unclear if you need to make a report, contact the Deputy Registrar.

Failure to report a new charge or criminal conviction could result in disciplinary action that could include the revocation of a member's licence or the denial of a practising licence to a candidate for membership.