

California SB 848

Private Schools Checklist



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POLICIES, TRAINING & PREVENTION (REQUIRED BY 7/01/2026)**Child Safety Policies**

- ☐ Adopt a **written child-safety and professional-boundaries policy**, including restrictions on staff–student electronic communication.
- ☐ Create a comprehensive **school safety plan** including student-protection procedures (Not required, but highly recommended as a best practice.)

Mandated Reporter Training

- ☐ Ensure all employees, all contractors, all board members, and any volunteers who interact with students outside the immediate supervision/control of a school employee or parent complete annual mandated-reporter training.
 - As a best practice, Church HR Network recommends training ALL volunteers in the event the volunteer may interact with pupils outside the immediate supervision/control of the pupil's parent/guardian or a school employee.
 - Note that all school personnel are required to complete training, regardless of whether they have direct contact with students.
- ☐ Track training completion dates for each individual (completed within 6 weeks of hiring or the start of the school year).

Student Abuse-Prevention Education

- ☐ Implement **age-appropriate abuse-prevention instruction for students** in alignment with forthcoming state guidance.
- ☐ Provide parent/guardian notification and opt-out options for student age-appropriate abuse-prevention instruction.

HIRING, VETTING & BACKGROUND CHECKS (REQUIRED BY 7/01/2027)**Prior Employment Disclosure**

- ☐ Require applicants to **disclose all prior employment at any public or private school**.
- ☐ Conduct a **Live Scan criminal history check** including Subsequent Arrest and Disposition Notification (SAN) through CA Department of Justice prior to hiring any employee or retaining the service of any volunteer who may interact with children outside the presence of school

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- personnel or parent,
- ☐ Enact a mandatory **hiring exclusion for any person convicted of a violent crime.**

Employer Contact & Misconduct Verification

- ☐ Contact all prior school employers (public and private) to check for **substantiated findings, pending investigations, or credible allegations** of misconduct involving minors.
- ☐ Review the statewide data system before hiring a prospective employee. (System will be established July 1, 2027)
- ☐ Enter the employee into the statewide data system within 30 days of hire.
- ☐ Update the statewide data system within 30 days of an employee's change in position in the private school.
- ☐ Update the statewide data system within 10 days of an employee's termination.
- ☐ Submit notice to the statewide data system within 10 days of the start of an investigation of egregious misconduct.
- ☐ Update the statewide data system within 10 days of completing an investigation of egregious misconduct.
- ☐ If a non-certified employee leaves the school mid-investigation, update the statewide data system to include this information in the employee's record.
- ☐ If a previously substantiated report is later determined by the school to be unfounded, notify the commission within 10 days. (The Commission on Teacher Credentialing (CTC) will have the record removal responsibility.)

No Nondisclosure of Misconduct

- ☐ **Prohibit contracts or settlement agreements that conceal allegations or findings of child abuse, grooming, or sexual misconduct, including expungement of any records of such from personnel files.**
- ☐ **Disclose to any prospective school employer** any reports of egregious misconduct made against any former employee.

STATEWIDE MISCONDUCT REPORTING AND LOOK-UP SYSTEM

(New and Central to SB 848 — Applies to Private Schools)

SB 848 mandates that California develop a **statewide database for documenting and reviewing substantiated misconduct** involving minors by school employees, contractors, or volunteers who interact with children outside the presence of school personnel or parents.

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School Responsibilities Once the Database Launches

- ☐ **Report any substantiated findings** of child abuse, grooming, egregious misconduct, or boundary violations to the statewide system.
- ☐ **Report resignations, terminations, or non-renewals** that occur during an active investigation for misconduct involving a minor.
- ☐ Submit required documentation in the format and within timelines set by the state (guidance forthcoming).
- ☐ Maintain **supporting investigative files** for all reports made to the state system.

Use of the Database for Hiring

- ☐ **Check the statewide database before hiring** any employee, contractor, coach, tutor, or volunteer in a position that involves student contact.
- ☐ Document that the database check was completed for every new hire or contracted provider.
- ☐ Ensure no individual with a substantiated record of misconduct in the database is hired or placed in any student-facing role.

Ongoing Compliance

- ☐ Update internal hiring procedures to include **mandatory database lookup steps**.
- ☐ Train administrators on what constitutes a **“reportable event”** under the new system.
- ☐ Revise internal investigation procedures to ensure timely and accurate reporting to the state once a finding is substantiated.
- ☐ Approve alternative Church HR Network Training from ministry perspective.
- ☐ Private school should not retain any employee who has been convicted of a violent crime (Best Practice).

Governance and Oversight

- ☐ Ensure the governing board receives **annual training on SB 848 duties**, including the statewide reporting system.
- ☐ Review all school safety and misconduct-prevention policies **at least annually**.
- ☐ Contact all prior school employers (public and private) to check for **substantiated findings, pending investigations, or credible allegations** of misconduct involving minors.
- ☐ Maintain a confidential **compliance log** documenting trainings, reporting actions, database checks, and policy updates.
- ☐ Ensure all third-party organizations (sports, music, after-school programs) also comply with **SB 848 reporting and vetting requirements**.

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If you have any questions about this information, contact Church HR Network at (888) 807-2476 or info@churchHRnetwork.com.

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