



## **BACKGROUND SCREENING POLICY FOR VOLUNTEERS**

Updated August 2021

### **PURPOSE:**

The primary purpose of this policy is to preserve the safety and well-being of all persons who choose to participate in programs offered by School of Economics (SOE). SOE is committed to the protection of all persons associated with SOE including staff, volunteers and guests and shall conduct criminal background checks on all volunteers. SOE will carry out this requirement in a fair, consistent, and non-discriminatory manner, complying with applicable state and federal laws and guidelines, including the Fair Credit Reporting Act and the Equal Employment Opportunities Commission.

### **BACKGROUND CHECK COMPANY SELECTION:**

SOE has selected Sterling Volunteers to conduct background checks on all volunteers. Sterling Volunteers is a corporation specializing in conducting criminal background checks for volunteers in full compliance of SOE's standards and expectations.

### **BACKGROUND CHECK REQUIREMENTS:**

All individuals who wish to serve as a volunteer and who are at least 18 years of age or older will be subject to a criminal background check. Minors, individuals under the age of 18, who wish to serve as a volunteer will not be subject to a criminal background check. Individuals will be screened on an annual basis.

### **BACKGROUND SCREENING PROCESS:**

- Every individual is required to complete a background screening and must sign up to volunteer with SOE.
- The individual will then be directed to Sterling Volunteers and register for their background screening.
- Sterling Volunteers will then conduct the screening that will entail the following:
  - **Social Security Trace**  
Social Security Verification verifies the applicant's name and date-of-birth against the social security number provided. This is utilized to help eliminate the possibility of false names and/or information.
  - **Government Watch List Search**  
The Office of Foreign Asset Control (OFAC) search finds those volunteers identified as threats to the United States, or who are ineligible to conduct business with the U.S. Federal Government. This search is utilized to help protect from serious threats on an international basis.
  - **Nationwide Sex Offender Database**  
Search of the National Sex Offender Registry to aggregate data from all 50 states, including Puerto Rico, Washington D.C., and Guam, along with tribal registries. This is an important supplement to criminal history searches but should not be used as a standalone source for your background screening.
  - **National Criminal Record Search**  
The national database search provides access through the National Background Directory to criminal data from all 50 states, the District of Columbia, Guam, Puerto Rico, and the Office of Foreign Assets Control (OFAC) history. (Over 900 million criminal records.)
- Results will be available within 24 hours. SOE will cross-reference the screening results with the 'Criteria for Exclusion' listed in this policy and assign a pass/fail grade for everyone. A pass grade for any volunteer that has zero disqualifying crime matches, a failure grade for any volunteer that has one or more disqualifying crime matches.
- All information pertaining to the background check will remain with Sterling Volunteers, subject to applicable laws subject to disclosure.
- In the event of a fail/disqualification, the individual shall not be eligible to volunteer in any role with children at

SOE. The prospective volunteer will be notified immediately of such by written notice (email). The prospective volunteer may contact Sterling Volunteers and request to receive a copy of the background check report, a copy of the "Summary of Your Rights under the Fair Credit Reporting Act (FCRA)" and information on how to dispute the results of the profile if he or she so chooses.

- If the volunteer should choose to appeal the contents of the report, the individual is responsible for taking appropriate action with Sterling Volunteers to have the results of the criminal background check report corrected if they believe information was reported in error. The volunteer is responsible for providing all documentation to support his or her claim. The volunteer will not be allowed to volunteer until the appeal process has been completed.

**Any person who willfully fails to comply with the background screening process or procedures shall be automatically disqualified. SOE will not allow an individual to volunteer who refuses to consent to the background screening policy and procedures.**

#### **PROPER DOCUMENTATION:**

The background check records on all individuals who both pass and fail the screening procedures will remain with Sterling Volunteers. No records will be kept by SOE other than the volunteer's name and the date of a pass or fail.

#### **CONFIDENTIALITY:**

In respect of the individual and their privacy, all personal information is closely protected, not disclosed outside of SOE, shared within SOE only on a need-to-know basis, and used solely for the purpose of conducting the background check.

The Development Director will administer the process of background checks. He/she will be responsible for providing the Volunteer an invitation to Sterling Volunteers. All information received because of the screening will be kept confidential

#### **CRITERIAS FOR EXCLUSION:**

A person who wishes to volunteer for SOE may be disqualified and prohibited from doing so if they have been found guilty of any of the following crimes:

*For purposes of this policy, Guilty shall mean that a person was found guilty following a trial, entered a guilty plea, entered a no contest plea accompanied by a court finding of guilt (regardless of adjudication), or received court directed programs in lieu of conviction.*

#### **SEX OFFENSES**

- All Sex Offenses – Regardless of the amount of time since offense.  
*Examples include: child molestation, rape, sexual assault, sexual battery, sodomy, prostitution, solicitation, indecent exposure, etc.*

#### **FELONIES**

- All Felony Violence – Regardless of the amount of time since offense.  
*Examples include: murder, manslaughter, aggravated assault, kidnapping, robbery, aggravated Burglary, etc.*
- All Felony offenses other than violence or sex within the past 10 years.  
*Examples include: drug offenses, theft, embezzlement, fraud, child endangerment, etc.*

#### **MISDEMEANORS**

- All misdemeanor violence offenses within the past 7 years  
*Examples include: simple assault, battery, domestic violence, hit & run, etc.*
- All misdemeanor drug & alcohol offenses within the past 5 years or multiple offenses in the past 10 years.  
*Examples include: driving under the influence, simple drug possession, drunk and disorderly, public intoxication, possession of drug paraphernalia, etc.*
- Any other misdemeanor within the past 5 years that would be considered a potential danger to children or is directly related to the functions of that volunteer.  
*Examples include: contributing to the delinquency of a minor, providing alcohol to a minor, theft – if person is handling monies, etc.*

## **Pending Cases**

It is recommended that anyone who has been charged for any of the disqualifying offenses or for cases pending in court should not be permitted to volunteer until the official adjudication of the case.

Should an approved individual subsequently have any criminal charges brought against him/her that are listed in our Criteria for Exclusion during their term of service to SOE, they will be required to immediately disclose the nature of the charges to SOE and voluntarily terminate their duties until a determination is made by SOE's Development Director regarding the effect of the pending charges on the individual's functions within the program.

### **SUMMARY CHECKLIST:**

- ✓ SOE sends invitation to volunteer instructing them to set up a Sterling Volunteers account.
- ✓ SOE pays the \$11 fee for the background screening. Volunteers are asked if they would like to cover the cost of the screening, but it is not required.
- ✓ Sterling Volunteers provides information to SOE and SOE makes the decision on if the volunteer is approved or not.
- ✓ If volunteer is approved by SOE they are notified via email by Sterling Volunteers they are eligible.
- ✓ If something comes up during the screening, the volunteer will receive a pre-adverse action notification email from Sterling Volunteers. Communication says, "If you wish to dispute the accuracy of the information in the report directly with the consumer reporting agency." The agency is Sterling Volunteers, not SOE. If the volunteer does not contact Sterling Volunteers with more information, then a decision will be made based on information currently available.
- ✓ If SOE denies a volunteer, Sterling Volunteers sends an Adverse Action Notification email to the volunteer.