Background Checks in Safeguarding

When is a background check required?

Criminal background checks are required every 5 years for all employees and for volunteers who require Safeguarding screening because of the role that they play in the organization. The screening requirements for the various roles in an organization are set out in <u>Safeguarding Requirements by</u> <u>Position</u> found in the Appendix of the policies.

Why does EDOT require a background check as part of the Safeguarding screening process?

Non-profit organizations that work with children, youth, or vulnerable adults routinely require background checks for their volunteers and employees. Congregations and other religious organizations must balance the desire to create trusting environments with the risk of being the only place where people with criminal backgrounds can gain access to children, youth, and vulnerable adults. We believe in grace and forgiveness, but we also have a responsibility to protect the people who seek ministry from us. Background checks are one tool that we use to screen adults who may not be well-intentioned or who should not be tempted to offend by being given access to potential victims of abuse.

Who runs the background check and what does it include?

In most cases, the Safeguarding Records Administrator (SRA) of the organization initiates the background check for lay persons through the diocesan Safeguarding Records System (SRS) as part of the electronic Safeguarding application process. Background checks through SRS are performed by the company, First Advantage. Sometimes an organization (most often a school) has a written agreement with the Safeguarding Office (an "Independent Screening Agreement") to screen their employees outside of SRS, using standards that meet or exceed those of the diocese. In these cases, background checks are still required but are not initiated or recorded in SRS, and a different (but approved) company may be used. First Advantage background checks include a Social Security Number verification and a national criminal and sex offender check for the past seven years. Members of the clergy are screened by the Bishop's Office, outside of SRS, and the company that performs clergy background checks is Oxford Document Management Company.

What kind of information must the applicant provide?

Applicants for Safeguarding screening are required to provide:

- Basic information, including official name, birthdate, driver's license number (if they have one), and current address
- Addresses for the past seven years
- Social Security Number (if they have one)
- A consent to the background check

How confidential is an applicant's information and how is the information kept secure?

The SRS system is run by iMIS, which has an integrated, organization-wide approach to managing cybersecurity risk based on the US National Institute of Standards and Technology (NIST) cybersecurity framework.

Generally, the only person who can view information on a background check is the SRA for the organization who has been trained to keep the information confidential. When the background check reveals something that calls into question its approval for Safeguarding, it will also be viewed by the head of the organization and perhaps the Safeguarding Manager and/or the Safeguarding Minister of the diocese.

What about the Social Security Number?

When a Social Security Number is entered into SRS, it shows up as asterisks only (no numbers appear as they are being typed). The number is asked for twice to ensure that the applicant is entering the number correctly. The numbers are stored in SRS (but visible only as asterisks) only until the SRA approves the application for certification. Once approved, the numbers themselves are no longer stored in SRS; only the asterisks remain. The Social Security Number does not appear on the Background Check report that is provided by First Advantage. Therefore, nowhere in SRS is the number retained. On rare occasions, however, the Manager of Safeguarding Certifications or an iMIS technical consultant must access the records of First Advantage (including the Social Security Number) to resolve an issue with the Background Check.

Who pays for the Background Check?

The Episcopal Diocese of Texas pays for all Background Checks run by First Advantage through SRS. The organization pays for Background Checks run under an Independent Screening Agreement.