

POLICY A25 – CRIMINAL HISTORY BACKGROUND CHECKS & PROTECTING GOD’S CHILDREN TRAINING

STATEMENT OF POLICY

The Archdiocese of Detroit values the safety of children in our care, our employees and volunteers, and the people we serve. We reaffirm our deep commitment to sustain and strengthen a safe environment within the Archdiocese of Detroit for children and youth. Since 2002, the Archbishop mandates that the Protecting God’s Children Program for Adults is implemented in all Archdiocesan entities, which includes all parishes and non-parish schools in the Archdiocese of Detroit.

The parish/NPS must conduct a criminal history background check on all employees. In addition, the parish/NPS must conduct a criminal history background check on any self-employed independent contractor or volunteer (including an individual receiving a stipend) who has a fiduciary responsibility to the parish/NPS, cash handling or other financial responsibilities, or whose duties include contact with minors, the elderly, or persons with disabilities.

A criminal history background check for persons with the above stated responsibilities is to be conducted immediately upon offer of employment or volunteer assignment, and before the individual starts work at the parish/NPS. All school staff, as required by law, must have a fingerprint criminal history background check. Criminal history background checks will encompass all places where the person has lived for the past seven (7) years. Prior to conducting the criminal history background check search, the accuracy of the personal information (full name, address, date of birth) provided on the background check authorization form must be verified against a government issued photo ID (e.g., Social Security Card, Driver’s License, or Passport) and must be safeguarded (see also *Addendum Q – Policy for Safeguarding Social Security Number Information*). The Results page of the criminal history background check is to be printed and maintained in a file separate from the employee personnel file (the Results page for employees, self-employed independent contractors and volunteers may be maintained in one combined file, or in a separate file maintained for each category of worker). Once verified, personal identifying information and documents must be destroyed in a cross-cut shredder.

Upon the discovery of a criminal conviction related to the employee/volunteer/self-employed independent contractor, the Archdiocesan entity is to immediately consult with the Archdiocesan Department of Human Resources Director or Archdiocesan Office of Catholic Schools Superintendent. All information received during the background check will be kept confidential by the Archdiocesan entity and Safe Environment Office, and filed permanently at the Archdiocesan entity. A final determination regarding future service of the employee/volunteer/self-employed independent contractor will be made by the Archdiocesan entity in consultation with the Director of Human Resources **and** Archdiocesan legal counsel.

Criminal history background checks must be re-run every five (5) years, or the required frequency as from time to time may be revised in the *Archdiocese of Detroit Policies & Procedures Regarding Sexual Abuse of Minors by Priests, Deacons and Other Church Personnel*.

The parish/NPS must require all employees to attend Protecting God’s Children training within the first 90 days of employment and prior to having contact with minors. In addition any self-employed independent contractor or volunteer (including an individual receiving a stipend) whose duties include contact with minors, must attend Protecting God’s Children training within the first 90 days of working relationship, and prior to having contact with minors.