OBJECTIVE

The overall objective of this Standard Operating Procedure (SOP) is to provide guidance for criminal background check compliance and training requirements for those Non-University organization that operate programs and activities utilizing the University’s campus involving children and vulnerable adults on campus. This is in accordance with the University’s Children and Vulnerable Adults Policy.

1. PURPOSE

The purpose of this SOP is to provide Non-University organizations with resources for identifying individuals who will promote and foster the well-being and safety of those that participate in the programs. It will further assure compliance with University policies, state and federal law.

2. SCOPE

Criminal background checks must be conducted on the organization’s employees, volunteers and representatives meeting Creighton’s University standards. Additionally, annual training on protecting children or vulnerable adults from abusive emotional and physical treatment, and on appropriate or required reporting of incidents of improper conduct must be conducted for all employees, volunteers and representatives.

3. RESPONSIBILITIES

Any Non-University organization intending to operate a program or activity involving children or vulnerable adults, must complete the following requirements:

- Register the program or activity with the Office of Equity and Inclusion by completing The Children and Vulnerable Adults Notification Form for Non-university Organizations at least 60 days prior to the first date of the program/activity.
- Conduct criminal background checks for the individuals (employees, volunteers, and representatives) participating in the organization’s program no more than 60 days prior to the first date of the program/activity as a condition for using the Creighton University campus.
- It is the responsibility of the person in charge of the program or activity to assure that each employee, volunteer and representative has completed the required background check and subsequently received clearance to participate. The University may request any additional information it deems necessary to meet the requirements of this policy. The background check must be renewed every four years and the Children and Vulnerable Adults Criminal Conviction Self Disclosure Form must be renewed annually.
- Provide documentation of the mandatory annual training of each employee, volunteer and representative.
4. REQUIREMENT

Background checks will include criminal offenses as well as charges that are currently pending. Background investigations will be conducted, via a contractual arrangement with an outside vendor.

- County Criminal Record Search
- Federal Criminal Record Search
- Social Security Number Trace Search
- Alias Name Search
- Sex Offender Registry
- Found Protection Orders
- Found Wants and Warrants
- Residential History Search
- Nebraska Adult and Child Abuse Registry

5. PROCEDURES

1. Register and receive approval of the program or activity by completing the Children and Vulnerable Adults Notification Form for Non-university Organizations.
2. Secure a completed Criminal Background Check Acknowledgement and Authorization Form from each individual and submit to the authorized background investigation service provider for processing.
3. Complete the Request to Authorize Adults Form for Non-university Organizations and submit it with the completed background check report to Creighton Human Resources at humanresources@creighton.edu for review and approval. Participation will be conditional upon receipt of results.
4. Provide documentation of the mandatory training, including program content and list of attendees, provided to all individuals participating in the program or activity at least 2 weeks prior to the first day of the program or activity.
5. Each authorized adult must complete the Children and Vulnerable Adults Self-Disclosure of Criminal Convictions Form on the first day of the program or activity. The program coordinator must submit the completed forms to The Office of Equity and Inclusion or the program’s campus contact within the first 24 hours of the program or activity.

6. OUTCOME of CRIMINAL BACKGROUND CHECK

If a criminal background check reveals adverse information or unfavorable results, the University will conduct an individualized assessment using criteria designed to identify potential risk to children and vulnerable adults. A prior conviction shall not automatically disqualify a person from participating in a program or activity. The results of background checks conducted under this policy will be used only for the purposes of this policy, except that Creighton University reserves the right to take appropriate action with respect to employees and/or volunteers who may have falsified or failed to disclose convictions that could disqualify them from employment that were revealed as a result of the background check, including and up to immediate termination.

A conviction of a felony or misdemeanor or a pending charge, by itself, does not disqualify an individual from participating in a non-sponsored event. However, consideration should be given to:
• Crimes against people
• the number of convictions;
• the nature, seriousness and date(s) of occurrence of the violation(s);
• rehabilitation;
• relevance of crime committed in relation to position;
• state or federal requirements related to the position; and
• other evidence demonstrating an ability to perform the job competently and free from posing a threat to the health and safety of others.

A decision not to permit an individual to participate in a program or activity covered by this policy based on the results of a background check will be made by Human Resources after consultation with the Office of Equity and Inclusion, the Office of the General Counsel, or others as needed.

Confidentiality: The handling of all records and subject information will be strictly confidential and revealed only to those required to have access. Any breach of confidentiality will be considered serious and appropriate disciplinary action will be taken.

7. REFUSAL TO SUBMIT

If the organization or an individual refuses to submit to a background check, their Creighton University access privileges will be denied.

Creighton University Human Resources oversees the background check process and questions should be directed to 402-280-2709 or humanresources@creighton.edu. All other inquiries should be directed to the Office of Equity and Inclusion at 402-280-3189.

8. PREFERRED VENDOR

The following is an approved external background check vendor:

Secured Data Services
Phone: 402-721-8260
Fax: 402-721-5706
Website: www.sdsinvestigations.com