



Nativity of Our Lord

Orthodox Church

Background Check

Policy, Procedures, and Processes

Manual

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1 INTRODUCTION

This manual outlines the policy and procedures of the Nativity of Our Lord (Nativity) Background Check program. The objective of the Background Check program is to mitigate the risk of person with an inappropriate history or criminal record

- Being in leadership positions involving youth related ministries and events
- Having access to personal information of parish members
- Having access to parish financial records and accounts

2 NATIVITY BACKGROUND CHECK POLICY

Nativity uses Praesidium Background Check Services. Nativity’s policy is to require background checks per Table 2.1 below

Background Check Required	Youth Related	Check Type	
No	Yes		Parent Chaperons
Yes	Yes		Altar Adults
Yes	Yes		Children’s Choir Volunteers
Yes	No		Clergy (Assigned)
No	No		Clergy (Stand-in)
Yes	Yes		Festival (Children’s Activities)
Yes	Yes		Greek School Leaders
Yes	Yes		Home Schooling Leader
Yes	No		Individuals with access to Nativity financial accounts and credit cards
No	No		Parish Advisory Council Members
Yes	No		Parish Employees
Yes	Yes		Sunday School Teachers and Substitutes
Yes	Yes		Youth Group Volunteers
Yes	Yes		Youth Protection Ministry Members

Table 2.1: Positions requiring background checks

2.1 CLERGY

Clergy assigned to Nativity of Our Lord Orthodox Church will undergo a background check within two weeks of locating to the Parish. Clergy not assigned to Nativity who are supporting or standing in for the Parish Priest will not require a background check. Should a background check identify adverse information, the Background Check Administrator will notify the Bishop and follow the Bishop’s guidance.

2.2 PARISH EMPLOYEES

Parish employees must undergo a background check prior to employment. Should a background check identify adverse information, employment will be at the Parish Priest’s discretion with the exception of convictions for child sexual abuse.

2.3 YOUTH RELATED MINISTRIES

A background check must be completed before an adult may assume any youth related ministry role. Parent chaperons are not required to undergo a background check. Any adult found to have a record of child abuse, sexual assault, or violent crimes will not be allowed to serve in youth related ministries.

2.4 PERSONS WITH AUTHORIZED ACCESS TO NATIVITY FINANCIAL ACCOUNTS AND CREDIT CARDS

Prior to persons being granted access to Nativity financial accounts and credit cards, they must undergo a Praesidium background check. Any adult found to have a record for a crime of theft, financial fraud, identity theft, or similar related violations will not be authorized access to Nativity financial accounts and credit cards.

3 PROCEDURES AND PROCESS

3.1 Privacy, Storage, and Handling

3.1.1 Privacy

Nativity will limit access to and protect the Personally Identifiable Information (PII) and results of background checks collected and saved as part of the Background Check process. Access to this information will be on a need to know to basis. Access to this information will be limited to the following individuals:

- Parish Priest
- Background Check Administrator (BCA)
- assistant Background Check Administrator (aBCA)
- Youth Protection Minister, as the information relates to records of child abuse, sexual assault, or violent crimes
- Finance Ministry Lead, as the information relates to records of theft, financial fraud, or identify theft

3.1.2 Reporting to Law Enforcement

The Background Check Administrator, with the knowledge of the assigned Parish Priest and Nativity Legal Counsel, may provide information obtained as a result of a background check to law enforcement.

3.1.3 Hardcopy Storage of PII and Background Check Information

Hardcopy PII and Background Check information will be stored in a locked file cabinet or safe, dedicated solely to storing of Background Check information and associated PII. Access to the cabinet or safe will be limited to the Parish Priest, the Background Check Administrator, and the assistant Background Check Administrator. Hardcopy material no longer needed will be destroyed by burning or shredding.

3.1.4 Background Check system account access

Currently, Nativity uses Praesidium's background check services. These services are accessed via the internet based account with Praesidium. Access to Nativity's Praesidium Background Check Services account and resulting electronic records will be limited to the Parish Priest, the Background Check Administrator, and the assistant Background Check Administrator. Only the Priest, Background Check Administrator and assistant Background Check Administrator will have administrative access to Nativity's Praesidium Background Check Services account.

3.1.5 Digital Storage of PII and Background Check Information

PII and Background Check information will only be stored digitally in a manner that allows access only to those authorized access per section 3.2. To mitigate the loss or compromise of this information, persons with authorized access may not permanently store this information on their personal computers and portable storage media such as USB drives, SD cards, DVDs, CDs, etc. As this information persists within the Nativity Praesidium Background Check Services account this information should never be emailed. Individuals needing access to the digital information should access the information thru the Nativity Praesidium Background Check Services account.

3.2 Background Check Processes

Background checks will be processed per Figure 3.2.

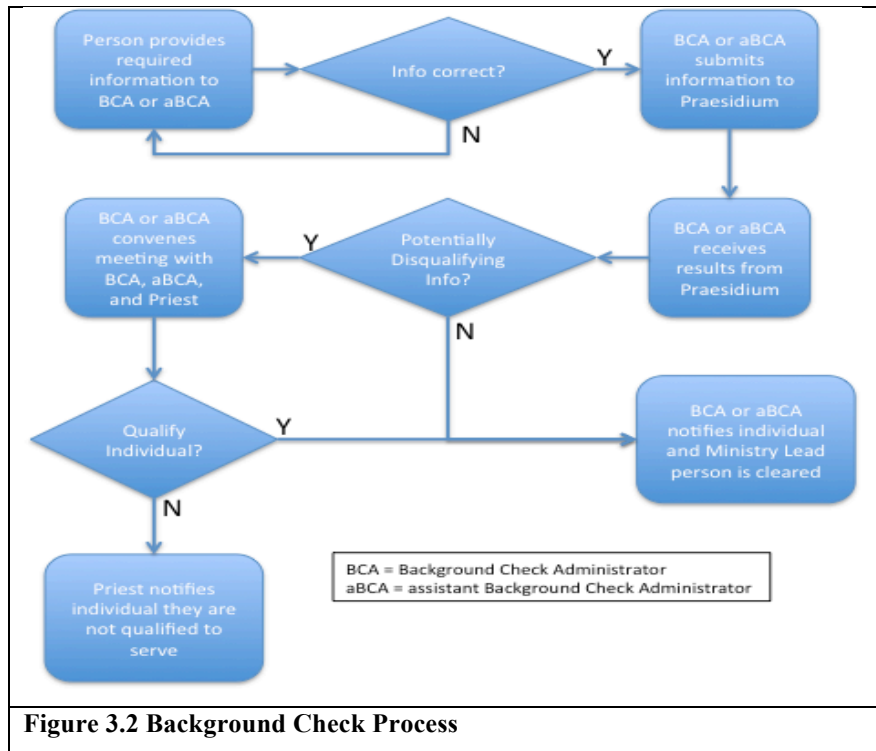


Figure 3.2 Background Check Process

3.2.1 Submission of PII and other information required

Individuals undergoing a background check will provide their information to the Background Check Administrator (BCA) or assistant BCA. A person may at their own discretion provide the information to a third party, i.e., the Sunday School Director or other ministry leader, with whom they have coordinated to provide the information to the Background Check Administrator. If the information is incorrect or incomplete, the BCA or aBCA will coordinate with the individual to correct the information.

3.2.2 Providing information to Praesidium

The BCA or aBCA will enter the PII and other required information into the Praesidium Background Check system and request the appropriate type background check for the individual per Section 2.0.

3.2.3 Review of Background Check results

The BCA or aBCA will review the background checks received from Praesidium for adverse information in accordance with Section 2.0. If the background check results in adverse information per Section 2.0 the BCA or aBCA will convene a meeting with the BCA, aBCA, Parish Priest to assess the information formally document the disqualification of an individual. The BCA or aBCA may at their discretion convene a meeting with the BCA, aBCA, and Parish Priest to discuss potentially disqualifying information not explicitly referenced in 2.0. The presence of Nativity's Legal Counsel at these meetings is at the Parish Priest's discretion.

3.2.4 Notification of Disqualification

If a person is disqualified from serving per Section 3.2.3, the Priest will notify the individual and the Ministry lead.

3.2.5 Notification of Qualification

If there is no adverse information resulting from a Background Check, the BCA or aBCA will document such and will notify the individual and Ministry lead that the person is cleared to server