

## **VOLUNTEER SCREENING, SAFETY TRAINING, AND BACKGROUND CHECK GUIDELINES FOR CO-SPONSORS**

All core team members and sourced interpreters must sign a confidentiality agreement and submit them with the Green Light Form. In addition, your group is expected to carefully screen volunteers and certify that safety training for childcare volunteers has taken place, and background checks have been conducted for every volunteer and interpreter.

### **Volunteer Screening**

As an IRIS co-sponsor, you are expected to carefully screen all volunteers who want to work with your group. We ask that groups get to know their volunteers well enough to judge their cultural sensitivity, interpersonal skills, and attitude toward refugees. By checking the box on the Green Light Form, you are confirming that you have a volunteer screening process in place. In the following detailed information on background checks, you may find the volunteer application process for IRIS-based volunteers useful in your screening procedures.

### **Safety Training**

If your community group is a religious organization that requires safe conduct and boundary training for childcare workers or volunteers, and if your volunteers working with children have done that training, you may check the box certifying that Safety Training has been done for those who work with children. The most basic childcare practice, that IRIS requires all groups to follow, is to require at least two adults be present at all times with the refugee children. OR: is to require that an adult volunteer never be alone with a single child; there must always be either a second adult or a second child present. If your community group does not currently offer child safety training, there are some online options provided in the document “Child Safety Online Training Options” on the co-sponsor resources web page.

### **Background Checks**

Following recommendations from our national refugee resettlement partners, IRIS now requires groups to conduct a background check for all active volunteers and interpreters. There are three options to choose from<sup>1</sup>:

- \$16 for Connecticut state-wide check with baseline national coverage
- \$20 for Connecticut state-wide and extended national check
- \$45 for global check (i.e., for non-resident foreign nationals, like international students)

Individual co-sponsor group members are responsible for paying for their background checks, for which they can seek reimbursement from their respective groups, if applicable.

The group contact person will need to send a roster of active volunteers and interpreters to her/his IRIS case manager so that IRIS can monitor the completion and approval of background checks centrally. S/he will be sent a link to invite her/his members to go forth with the background check and can monitor their members' checks; statuses. Checks can be undertaken individually by each volunteer and interpreter and results will be revealed to IRIS

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<sup>1</sup> These prices are current as of February 2021.

within 48-72 hours. The following “Volunteer Background Check Policy and Procedure” provides for detailed information and directions.

## **IRIS Volunteer Background Check Policy and Procedure (effective February 2021)**

The following outlines the policies and procedures of IRIS in regard to volunteer and intern background checks using the service Sterling Volunteers. This policy will demonstrate which staff members hold responsibility for conducting volunteer and intern background checks; the process for all volunteers and interns before, during, and after they are asked to submit a background check through Sterling Volunteers; the role of co-sponsorship groups; and the process for volunteers or interns for whom payment of the background check costs would be a barrier to volunteering at IRIS.

### Section I. Volunteer Programs Specialist

The role of the Volunteer Programs Specialist is to oversee the application process for all who apply to volunteer or intern with IRIS.

The application process to become a new volunteer or intern at IRIS is as follows:

1. Apply via online application at [irisct.org](http://irisct.org), for those who will be volunteering at IRIS in New Haven. Those applying to volunteer with Co-sponsors will follow the application procedures of each co-sponsor group.
2. Application is reviewed by Volunteer Programs Specialist or Volunteer Coordination intern for those who will be volunteering at IRIS in New Haven to ensure that applicant has the appropriate experience and availability for the volunteer/intern position. Applicants in New Haven are referred to staff member (varies based on volunteer/intern position) for interview.
3. Staff member alerts Volunteer Programs Specialist that they would like to accept the applicant into their department.
4. Character reference checks are completed.
5. Volunteer receives an email invitation to orientation which includes a background check invitation link to Sterling Volunteers. For co-sponsor volunteers, each group will have a designated Volunteer Programs Specialist responsible for sending interested volunteers a background check invitation.
6. Volunteer is responsible to complete online background check through Sterling Volunteers platform before attending orientation in New Haven or with co-sponsor group.
7. Sterling Volunteers send background check results electronically to IRIS Volunteer Programs Specialist (for IRIS New Haven volunteer) or co-sponsor leaders (for co-sponsor led volunteer) for review. If any adverse events are identified, the following steps will occur:
  - a. Pre-adverse action notice sent to volunteers who are flagged in background check.
  - b. Volunteers have two weeks to respond to adverse action letter with explanation of their background check results
  - c. IRIS or co-sponsor team lead makes final decision about whether or not to accept volunteer and sends second letter (formatted below) informing volunteer of decision.
8. Accepted volunteers attend an orientation with Volunteer Programs Specialist, Acculturation Programs Coordinator, or Co-Sponsor team.

### Section II. Co-sponsorship Groups

All co-sponsorship groups will be required to follow IRIS policies regarding background checks. Co-sponsor group chairs will identify the individual within their group responsible for managing their group's Sterling Volunteers account and communicate contact information (Full Name, Phone Number, Email Address, Preferred Username) for that individual to the IRIS Co-Sponsorship Manager. The IRIS Volunteer Programs Specialist will provide that information to Sterling Volunteers to set-up an account for the group within the IRIS "parent" account. The co-sponsor account will be set-up by Sterling Volunteers within 2-3 days of their receipt of the information and the **green light form**, which is required to substantiate the relationship between your group and IRIS. An email notification will be sent by Sterling Volunteers to the co-sponsor account manager with instructions on set-up, a training demonstration and full access to Sterling Volunteers webinars and staff for additional training.

Co-sponsorship group Sterling Volunteers accounts will function as a chapter of the IRIS account and will have access to the group's subaccount "dashboard". From the dashboard, the designated account leader from the group can send out invitations to prospective volunteers and monitor the status of their applications. The IRIS Volunteer Programs Specialist is responsible for centrally monitoring and approving all applications. While the account leader will receive notifications via email when applications are approved, s/he may also monitor application statuses.

Co-sponsorship groups will be responsible for following the Sterling Volunteers and IRIS adverse action policies in regard to flagged background checks as detailed in Section V. Adverse Action Protocol.

### Section III. Financial Costs to IRIS

IRIS will cover the cost of background checks for those with financial hardships (see guidelines below) in New Haven. All other New Haven-based volunteers will pay the cost of their own background check.

Co-sponsorship groups will decide independently whether their group or their volunteers will pay for the background checks and whether any financial hardship exceptions are to be made.

### Section IV. Financial Hardship Qualifications

Some volunteers or interns may qualify for assistance with paying for their required background check. Any person seeking to have IRIS cover the cost of their background check must meet one or more of the following criteria:

- Full time students currently enrolled in an educational program (high school, college, university, etc.);
- Currently receiving any DSS benefits (SNAP, TANF, Medicaid); and/or
- Recently unemployed.

The Volunteer Programs Specialist will be responsible for reviewing all requests for financial hardship assistance using the above criteria. If the applicant is deemed to have a financial hardship they will be emailed a new link to Sterling Volunteers allowing them to defer the cost of the background check to IRIS.

### Section V. Adverse Action Protocol[1]

IRIS will request that Sterling Volunteers "flag" a background check when the following records are discovered in a potential volunteer's check:

- A violent criminal record, including sex crimes, convictions for child or domestic abuse, or drug-related convictions.
- Fraud or theft convictions, including bankruptcies, thefts, and identity theft.

In all occasions when a potential volunteer is flagged (regardless of their skill set or potential usefulness as a volunteer), they will be notified by the IRIS Volunteer Programs Specialist that an “adverse action” report from the results of their background check is being reviewed. This will happen through the following steps, as required by law:

1. Pre-Adverse Action Notice sent to let potential volunteer know their background content is not in compliance with IRIS’s background check policy (see attached template email).
2. IRIS will provide them access to their background check report, a copy of “A Summary of Your Rights under the Fair Credit Reporting Act,” and five business days to dispute the accuracy or completeness of information in the report. This allows the applicant time to respond to the findings and dispute any inaccuracies.
3. If the volunteer does not dispute the contents of their background check within five business days, or if they dispute the contents but the IRIS staff person and their direct supervisor (or co-sponsor leader) are not satisfied with the response, then IRIS or co-sponsor leader will send a “post adverse action” letter (this notice should be sent in writing) indicating that the matter is closed and the potential volunteer is ineligible for volunteer programs. The following information must be included in the letter: [2]
  - a. State that the adverse action is based either in whole or part on information contained in the background report provided by the Consumer Reporting Agency (CRA).
  - b. Name, address, and toll free telephone number of the CRA you used.
  - c. Statement that the CRA supplying the background report had no hand in the decision to take adverse action and cannot give specific reasons for it.
  - d. Notice of applicant's right to dispute the accuracy or completeness of the provided information (covered in the Pre-Adverse action).
  - e. Notice of applicant's right to another free consumer report. This is provided upon request of the CRA within 60 days.
  - f. While oral adverse action notices are allowed, written notices provide proof of FCRA compliance.

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[1] Adapted using Sterling Volunteers article “Navigating the Adverse Action Process for Volunteers” by Laura Stroud on 12 May 2016.

[2] Adapted using Verif1rst article “Adverse Action Notice: Common Compliance Questions” by Ryan Howard on 04 May 2017.