



## **Appendix A: Background Screening**

The American Royal Association, Inc. (American Royal) seeks to provide a safe environment for all persons who are associated with the American Royal including staff, volunteers, and guests. The American Royal shall conduct criminal background checks of all volunteers for American Royal youth events or who have direct contact with children participating in our programs. The American Royal will carry out this requirement in a fair, consistent and non-discriminatory manner, complying with applicable state and federal laws and guidelines, including but not limited to the Fair Credit Reporting Act and the Equal Employment Opportunities Commission.

The American Royal utilizes name-based and Social Security number-based systems to obtain data for individual background checks, but at a minimum each individual background check shall include: (a) Social Security number trace, (b) a national search of sex offender registries and (c) a national search of criminal records. Background checks shall be conducted prior to employment or volunteer service and renewed every seven (7) years.

Background check findings shall be reviewed in a fair, impartial, and confidential manner. Because the American Royal's priority is the safety of the staff, volunteers and guests, certain actions and convictions for certain crimes serve to automatically disqualify applicants for volunteer service at the American Royal in any position that involves working with children. A person will be ineligible for volunteer service if the person:

- (1) refuses to consent to a criminal background check,
- (2) makes a false statement in connection with such criminal background check,
- (3) is registered, or required to be registered on any sex offender registry,
- (4) has been convicted of a violent felony,
- (5) or has been convicted within the past 7 years of a non-violent felony or misdemeanor involving:
  - (a) physical assault or battery,
  - (b) drugs or controlled substances, or
  - (c) cruelty to animals.

With respect to convictions for crimes not listed above, any applicant with such a conviction shall be evaluated on an individual basis to determine whether they should be excluded from consideration based on the conviction. In so doing, the American Royal shall consider the following factors:

- the nature and gravity of the offense
- the time that has passed since the offense or completion of sentence
- the nature of the job sought or held



- the facts and circumstances surrounding the offense or conduct
- the number of offenses for which the individual was convicted
- the age of the individual at the time of conviction or release
- evidence that the individual performed the same type of work, post-conviction, with the same or a different employer with no known incidents of criminal conduct; the length and consistency of employment history before and after the offense or conduct
- rehabilitation efforts, e.g., education and/or training
- employment or character references and any other information regarding fitness for the particular position, and
- whether the individual is bonded under a federal, state, or local bonding program.

The American Royal shall alert the applicant to the possibility of his or her exclusion due to past criminal conduct and provide the applicant an opportunity to submit an explanation. All personal data, background check data, and adverse action letters shall be treated as confidential and maintained in a secure location for one (1) year and will then be destroyed.