

Clearance, Education, Mandatory Disclosure, and Training Requirements for King's College Employees, Students, Vendors and Volunteers

The Safety and Protection of Children: In order to ensure the safety and protection of children in programs sponsored by the College, whether on campus or off-campus, King's College requires that all College employees and vendors receive the appropriate clearances and training outlined in this policy.

In addition, students and volunteers who have routine or direct contact with children must receive the appropriate clearances and training outlined in this policy.

Individuals who have routine or direct contact with children include those individuals who are responsible for the welfare of a child; provide care, supervision, guidance or control of children; or have contact with a child or children that is regular, ongoing and integral to their responsibilities. In terms of the duration and frequency of contact, routine contact is described as ten (10) or more hours or five (5) or more distinct contacts in the course of a twelve month period.

A child or a minor child is defined as a person under the eighteen years of age. This includes matriculated students or program participants seventeen years of age and younger.

I. CLEARANCES, EDUCATION, MANDATORY REPORTING AND TRAINING FOR EMPLOYEES

All King's College employees (full and part-time) are required to obtain the clearances listed below, and to receive the training prescribed below as a condition of employment.

A. Clearances: All employees shall work in collaboration with the King's College Office of Human Resources to obtain and maintain the following clearances (some of which may require periodic updates):

- FBI Background Check (fingerprint-based federal criminal history submitted to the FBI through the Pennsylvania State Police or an authorized agent of the Pennsylvania State Police)
- Pennsylvania Criminal Background Check (report of criminal history from the Pennsylvania State Police)
- Pennsylvania Child Abuse History (from the Department of Human Services)
- National Sex Offender Public Registry Check (new employees only)

The Office of Human Resources will maintain a copy of any clearances submitted by the employee or received electronically. All clearances must be submitted by August 1, 2017 for present employees, and for all new employees in conformity with the stipulations in Section V of this document, "Working Provisionally with Children."

B. Mandatory Disclosure: If an employee is arrested for or convicted of an offense that would constitute dismissal from employment, or if an employee is named as perpetrator in a founded or indicated report of child abuse through child protective services, the employee must provide written notice of the incident to King's College Office of Human Resources within 72 hours.

- C. Education and Training:** The level of education and training required for employees is based on the level of contact with children in the course of employment. The King's College Office of Human Resources will set appropriate training requirements based on an employee's role, level of interaction with children, professional licensing and state law requirements.

All employees are required as a condition of employment to review the document, "Guidelines for Appropriate Interaction with Children," sign a copy of the guidelines acknowledging that s/he has read the document, understands its contents and will adhere to the guidelines. All newly hired employees must do so prior to the commencement of employment.

Employees with routine or direct contact with children are also required to:

- Complete at least three hours of approved child abuse recognition and reporting training every five years. This training includes the on-line United Educators training module on child abuse. The College will provide access to such training.
- Employees in this category include: coaches, resident counselors, resident assistants, enrollment division recruiters, Achievement Plus personnel, Faculty teaching dual enrollment courses, and maintenance and housekeeping personnel who have access to residence halls. Other employees may also be designated by the King's College Office of Human Resources.

On-site supervisors of programs involving children are also required to:

- Complete the on-line United Educators training module on child abuse.
- Designated programs include: the McGowan Hispanic Outreach staff, the coordinators of the Juvenile Justice Program, the Shoal Center staff, and on-site supervisors in the education department. Other programs may also be designated by the College.

II. CLEARANCES, EDUCATION, MANDATORY REPORTING, AND TRAINING FOR STUDENTS

Students who are responsible for the welfare of children or have routine or direct contact with children through College-sponsored curricular or co-curricular programs or activities are required to obtain appropriate clearances and training. Routine or direct contact is regular, ongoing contact that is integral to the student's responsibilities related to children. In terms of the duration and frequency of contact, routine or direct contact is described as ten (10) or more hours or five (5) or more distinct contacts in the course of a twelve month period.

A. Clearances For Students Taking Education Courses (EDUC prefix):

- FBI Background Check (fingerprint-based federal criminal history submitted to the FBI through the Pennsylvania State Police or an authorized agent of the Pennsylvania State Police)

- Pennsylvania Criminal Background Check (report of criminal history from the Pennsylvania State Police)
- Pennsylvania Child Abuse History (from the Department of Human Services)
- National Sex Offender Public Registry Check (one time only)

B. Clearances for Students Who Host Minors as Overnight Recruitment Guests:

- National Sex Offender Public Registry Check
- FBI Background Check (fingerprint-based federal criminal history submitted to the FBI through the Pennsylvania State Police or an authorized agent of the Pennsylvania State Police)
- Pennsylvania Criminal Background Check
- Pennsylvania Child Abuse History (from the Department of Human Services)

C. Clearances for Students Not Enrolled in Education (EDUC) Courses Who Have Routine or Direct Contact with Children:

- FBI Background Check (fingerprint-based federal criminal history submitted to the FBI through the Pennsylvania State Police or an authorized agent of the Pennsylvania State Police)
 - The FBI clearance is not required for students who meet the following criteria: 1) the position is unpaid; 2) the volunteer has been a PA resident continuously for the past 10 years; and 3) the student signs a disclaimer affirming there are no grounds that would prohibit their selection as a volunteer.
- Pennsylvania Criminal Background Check (report of criminal history from the Pennsylvania State Police)
- Pennsylvania Child Abuse History (from the Department of Human Services)
- National Sex Offender Public Registry Check

D. Mandatory Disclosure: Under the King’s College Student Handbook, all students are required to report arrests and convictions to the Associate Vice President for Student Affairs and Dean of Students.

E. Education and Training for Students Taking an Education Course (EDUC prefix): King’s College Education students are required to:

- Complete the on-line United Educators training program on child abuse;
- Review the document, “Guidelines for Appropriate Interaction with Children,” and sign a copy of the guidelines acknowledging that s/he has read the document, understands its contents and will adhere to the guidelines; and
- If engaged in student teaching, complete the VIRTUS training program.

All students taking an education course must complete his or her education and training requirements prior to the beginning of his or her student-teaching placement.

F. Education and Training for Students Not Enrolled in an EDUC Course Who Have Routine or Direct Contact with Children: King's College students who have routine or direct contact with children are required to review the document, "Guidelines for Appropriate Interaction with Children," and to sign a copy of the guidelines acknowledging that s/he has read the document, understands its content and will adhere to the guidelines prior to working with children. In addition, these students are required to complete the on-line United Educators training program on child abuse.

G. Education and Training for Students who Host Minors as Overnight Recruitment Guests: King's College students who host minors as overnight recruitment guests are required to review the document, "Guidelines for Appropriate Interaction with Children," and to sign a copy of the guidelines acknowledging that s/he has read the document, understands its content and will adhere to the guidelines prior to hosting recruitment guests. In addition, these students are required to complete the on-line training program provided by United Educators.

III. CLEARANCES, EDUCATION, MANDATORY DISCLOSURE AND TRAINING FOR VENDORS¹

All vendors and employees of vendors whose contractual responsibilities require routine or direct contact with children are required to obtain appropriate background clearances and training.

A. Clearances: All vendors and employees of vendors who have routine or direct contact with children must obtain and maintain the following clearances (some of which may require periodic updates):

- FBI Background Check (fingerprint-based federal criminal history submitted to the FBI through the Pennsylvania State Police or an authorized agent of the Pennsylvania State Police)
- Pennsylvania Criminal Background Check (report of criminal history from the Pennsylvania State Police)
- Pennsylvania Child Abuse History (from the Department of Human Services)
- National Sex Offender Public Registry Check

Each vendor is required to oversee the processes related to obtaining and tracking the necessary clearances and training of all their employees. Each vendor is also required to certify

¹ The term vendor refers to a person or company who has a contractual agreement regarding employees that carry out their employment at the College. In terms of the duration and frequency of contact, routine or direct contact is described as ten (10) or more hours or five (5) or more distinct contacts in the course of a twelve month period.

on an annual basis that all of its employees working at the College have obtained the appropriate clearances and training.

- B. Mandatory Disclosure:** If a vendor or employee of a vendor is arrested for or convicted of an offense that would constitute grounds for denying employment, or if an employee of a vendor is named as perpetrator in a founded or indicated report of child abuse through child protective services, the vendor must provide written notice of the incident to King's College Office of Human Resources within 72 hours.

- C. Education and Training:** All vendors and employees of vendors who have routine or direct contact with children are required to review the document, "Guidelines for Appropriate Interaction with Children," and to sign a copy of the guidelines acknowledging that s/he has read the document, understands its contents and will adhere to the guidelines. This must be completed prior to working at the College.

IV. CLEARANCES, EDUCATION, MANDATORY DISCLOSURE AND TRAINING FOR VOLUNTEERS

All volunteers who are responsible for the welfare of a child or who have routine or direct contact with children in a King's College-sponsored program are required to obtain the clearances listed below; to update clearances periodically; and to receive the training prescribed below as a condition of volunteering.

- A. Clearances:** All volunteers shall obtain and submit to the Director of Human Resources the following clearances (some of which may require periodic updates):
 - FBI Background Check (fingerprint-based federal criminal history submitted to the FBI through the Pennsylvania State Police or an authorized agent of the Pennsylvania State Police)
 - The FBI clearance is not required for volunteers who meet the following criteria: 1) the position is unpaid; 2) the volunteer has been a PA resident continuously for the past 10 years; and 3) the volunteer signs a disclaimer affirming there are no grounds that would prohibit their selection as a volunteer.
 - Pennsylvania Criminal Background Check (report of criminal history from the Pennsylvania State Police)
 - Pennsylvania Child Abuse History (from the Department of Human Services)
 - National Sex Offender Public Registry Check

King's College volunteers must present the original document for inspection by the Office of Human Resources, and the Office will maintain a copy. Volunteers must submit clearances prior to the commencement of service.

After the initial clearances have been completed, volunteers must provide updated FBI, PA criminal and PA child abuse clearances every three years.

- B. Mandatory Disclosure:** If a volunteer is arrested for or convicted of an offense that would constitute grounds for denying participation as a volunteer, or if a volunteer is named as perpetrator in a founded or indicated report of child abuse through child protective services, the volunteer must provide written notice of the incident to King's College Office of Human Resources within 72 hours.
- C. Education and Training:** All volunteers responsible for the welfare of a child or who have routine or direct contact with children are required to review the document, "Guidelines for Appropriate Interaction with Children," and sign a copy of the guidelines acknowledging that s/he has read the document, understands its contents and will adhere to the guidelines.

V. WORKING PROVISIONALLY WITH CHILDREN

- A. Employees and Vendors:** Clearances must be submitted prior to the commencement of employment or service and must be periodically updated as outlined above. Individuals may be provisionally employed for a single period, not to exceed 90 days, if all of the following criteria are met:
- The applicant has applied for the required clearances and s/he provides a copy of the completed forms to his or her employer;
 - The employer has no knowledge of information pertaining to the applicant which would disqualify him or her from employment;
 - The applicant signs a disclaimer affirming there are no grounds that would disqualify him or her as an employee; and,
 - The applicant is not permitted to work alone with children and must work in the immediate vicinity of a permanent employee.
- B. Students and Volunteers with Routine or Direct Contact with Children:** All students who are responsible for the welfare of children or have routine or direct contact with children as described above must have clearances before beginning service. A volunteer may serve provisionally for a single period, not to exceed 30 days, if all of the following criteria are met:
- The applicant has applied for the three required clearances and s/he provides a copy of the completed forms to his or her employer;
 - The employer has no knowledge of information pertaining to the applicant which would disqualify him or her from employment;
 - The applicant affirming there are no grounds that would disqualify his or her selection as a volunteer; and,
 - The applicant is not permitted to work alone with children and must work in the immediate vicinity of a permanent employee.

VI. TRACKING CLEARANCES AND TRAINING

- A. Employees:** The Office of Human Resources is responsible for maintaining the necessary records related to clearances and training requirements of all King's College employees.
- B. Students:** The oversight of the process related to obtaining and tracking the necessary clearances and training of all King's College students required to obtain clearances and training under this policy is shared by various departments within the College, as listed below. A copy of these records must be stored in the Office of the Associate Vice President for Student Affairs and Dean of Students for a period of seven (7) years. The College conforms to FERPA guidelines in maintaining the privacy of these records.
1. **Education Students:** Education Department
 2. **Student Volunteers:** Shoal Center for Community Engagement
 3. **Students in Service Learning Courses:** The course instructor and the Shoal Center
 4. **Students in Education Courses (EDUC prefix):** Education Department
 5. **Monarch Ambassadors:** Office of Admissions
 6. **Student Athletes Hosting Recruits:** Department of Athletics
- C. Vendors:** Each vendor is required to oversee the processes related to obtaining and tracking the necessary clearances and training of all their employees. Each vendor is also required to certify on an annual basis that all of its employees working at the College have obtained the appropriate clearances and training. This certification must be filed with the Child Safety Protection Coordinator.
- D. Volunteers:** The Director of Human Resources is responsible for maintaining the necessary records related to clearances and training requirements of all non-King's College employees and students who volunteer at the College.

VII. COSTS RELATED to OBTAINING CLEARANCES AND PROVIDING TRAINING

- A. Employees:** The College covers the costs related to obtaining and tracking the clearances and training for all its employees and applicants for employment.
- B. Students:** Students taking education courses are responsible for the costs associated with obtaining the clearances. The College assumes the costs related to students engaged in volunteer service or in service-learning courses and programs.
- C. Vendors:** Each vendor covers the cost of obtaining clearances and training for all their employees including students enrolled at the College.
- D. Volunteers:** The College will assume the costs related to clearances and training for all volunteers.

