



BACKGROUND SCREENING POLICY AND PROCEDURES

I. STATEMENT OF PURPOSE

Cottage Theatre is concerned about the safety of our youth, volunteers, and employees while on duty, and the protection of CT's assets and reputation. To reduce those risks, prospective, and as applicable, current employees and volunteers of Cottage Theatre will undergo a criminal background check that complies with the Fair Credit Reporting Act (FCRA). Volunteers are treated as applicants under the FCRA.

Any questions or special considerations concerning this policy should be directed to Cottage Theatre Executive Director.

II. HIRING

All employees (both regular and temporary) must undergo a state and federal criminal background check, including the sex offender registry, prior to hiring, and every three years thereafter.

III. EMPLOYEES AND VOLUNTEERS

All employees and volunteers for Cottage Theatre who participate on a "Regular Basis" must undergo a background check, at least once every three years.

- Regular Basis is defined as a task that is scheduled for two or more days a year, or for any single instance that is scheduled to be longer than 8 hours.
- The background check will consist of at least a Basic Volunteer Screening which includes the National Criminal and National Sex-Offender Registry.
- The background check must be completed prior to the individual's second day of regularly scheduled volunteering.
- Cost associated with the background check will be covered by the Cottage Theatre.
- All volunteers who participate on a Regular Basis and are 18 or older will have the background check regardless of association with youth or otherwise, and without regard to position: actors, directors, designers, running crew, building crew, ushers, administrative aides, etc.
 - a) For purposes of this policy, volunteers assisting with bulk mailings, volunteers in administrative service who are not regularly scheduled and are in the building during business hours, and fill-in ushers who have not ushered in the prior year will not be considered as participating on a Regular Basis.
- Individuals under 18 are exempt from the background check.

IV. BACKGROUND CHECK PROCEDURE

- Every potential volunteer and employee must submit first name, last name and an email address or other acceptable means of contact.
- One individual, appointed by Cottage Theatre, will submit this information to a nationally recognized company, currently Coeus Global, which in turn will send the background check form to the applicant.
- After completing the form, Coeus Global will submit a report to the Cottage Theatre representative, the Executive Director unless someone else has been designated by the Board, who will review the report.
- Once the report results are in, the applicant will be notified of the results.
- If the report has questionable information, the Cottage Theatre representative will make the determination to accept or reject the applicant. The representative may consult with Board Members if needed.
- If the Cottage Theatre representative rejects the applicant, and the applicant wishes to appeal the decision, he/she/they may contact the President of the Board of Directors.
- The employee or production volunteer responsible for leading the applicant will be notified of the decision to accept or reject the applicant.
- No sensitive personal identifying information will be collected or stored at Cottage Theatre.

IV. DISQUALIFICATION CRITERIA

- The representative should review the report and determine if any negative information has a direct connection with an applicant's ability to fulfill the duties of the position with competence and integrity, or that might impact safety. Matters that might raise a concern include but are not limited to the following:
 - Criminal History Search - A criminal conviction will not automatically prohibit an individual from being on employees or volunteering at Cottage Theatre, but will be reviewed on a case-by-case basis.
 - Conviction for the following categories of crimes are generally considered role-related and, therefore, may be considered in making decisions:
 - i) Any recent felony conviction - those serious crimes are in general punishable by more than 1-year incarceration.
 - ii) Theft - including burglary, embezzlement, forgery, fraud.
 - iii) Violent crimes - including murder, assault, battery.
 - iv) Drug-related crimes - including use, sale, possession, distribution, or manufacture of illegal drugs.
 - v) Sex offenses - including rape and sexual assault.
 - vi) Serious motor vehicle offenses - including driving under the influence of alcohol or drugs.

- Arrests that did not result in conviction should not be considered. Arrests pending disposition that are role-related may be considered subject to state law.
- Prior to making a decision regarding eligibility, Cottage Theatre may validate, using approved identification (e.g. Driver's License), that the background check was run using the same correct information.
- Arrest information: Any volunteer or employee who is arrested must disclose arrest within 48 hours to Executive Director unless the arrest is protected from disclosure by state law. If while a volunteer or employee the volunteer/employee did not disclose an arrest to the Executive Director within 48 hours pursuant to policy and applicable state law did not protect the arrest from disclosure, failure to disclose is grounds for discipline up to removal from the position. Arrests that are disclosed or that are revealed by a search will not necessarily result in termination of volunteer status, but will be reviewed on a case-by-case basis.
- Motor Vehicle Reports - This report can indicate that the applicant has a suspended or revoked license. Further, serious motor vehicle violations such as Driving While Intoxicated, Driving Under the influence, Driving While Ability Impaired or reckless driving may be relevant for all positions.