

Sponsor Circle Program Background Checks Protocol

The Sponsor Circle Program (SCP) is committed to ensuring the safety of its volunteers and the individuals it serves. Therefore, all individuals applying to participate in a Sponsor Circle must undergo a background check and sign the Code of Conduct prior to approval and participation in the Sponsor Circle. Sponsor Circle members are required to report any new charges or convictions during participation in the Sponsor Circle Program. The Community Sponsorship Hub (CSH) is the coordinating partner of the SCP and is responsible for ensuring background checks and other pre-requisites are met.

If a Sponsor Circle member or volunteer associated with the Sponsor Circle will be providing temporary housing on their property, all individuals residing at that property must undergo a background check.

This policy shall be published on the Sponsor Circle Program website: www.sponsorcircles.org.

Background Checks

1. Each individual applying for Sponsor Circle membership must submit to a background check via the Sterling Volunteers website [here](#).
2. The CSH will review the results of the background check to determine if any negative information has a direct connection with an individual's ability to fulfill the individual's duties with competence and integrity or that might jeopardize safety.
 - a. While each background check will be reviewed on a case-by-case basis, certain convictions will render an individual ineligible to participate in a Sponsor Circle. These are charges pending disposition, guilty pleas, or convictions for:
 - i. crimes of violence (such as rape, malicious assault, abuse, etc.) that causes harm to any individual, within the past seven years or crimes involving the death of an individual, whether voluntary or involuntary, within the past fifteen years;
 - ii. felony or misdemeanor crime against a child or incapacitated adult within the past fifteen years;
 - iii. identity theft, fraud, embezzlement, or related financial crimes within the past seven years;
 - iv. felony drug-related crimes, including but not limited to the use, sale, possession, distribution, or manufacture of illegal drugs within the past seven years;
 - v. crimes involving human trafficking, sex trafficking, abduction, or kidnapping; or
 - vi. crimes requiring the registration as a registered sex offender.
 - b. Pleas of *nolo contendere* cannot be considered a conviction and shall be reviewed on a case-by-case basis.
 - c. For crimes not listed above, or for criminal records that do not clearly fall within the above categories (e.g., charged but not convicted), evaluations will be made on a case-by-case basis by Community Sponsorship Hub staff, considering the following:
 - i. nature of the offense and whether there was a conviction;
 - ii. relevance of the offense to the Sponsor Circle responsibilities;
 - iii. elapsed time since the offense conviction;
 - iv. age of the applicant at the time of the offense or conviction;
 - v. severity and specific circumstances of the offense;
 - vi. number of offenses;
 - vii. rehabilitation since the offense; and
 - viii. any other relevant information.
3. If an individual applying for Sponsor Circle membership has not completed their background check at the time of the Sponsor Circle application to the program, CSH staff will notify the Sponsor Circle Coordinator via email. The Sponsor Circle Coordinator will communicate with the



individual and establish a time period for obtaining the background check before the individual's application is rejected as incomplete.

4. A Sponsor Circle cannot proceed to full vetting and certification until all members have completed and cleared background checks and signed the Code of Conduct.
5. If an individual applying for Sponsor Circle membership is deemed to be ineligible under this policy, the individual member will be notified via email (to the email address provided during the background check) that (i) they are ineligible to participate in an Sponsor Circle, (ii) the reasons for ineligibility, and (iii) notice that they have seven calendar days to respond and dispute the accuracy or completeness of information in the background check report.
6. If the individual does not dispute the contents of the background check within seven calendar days, or if they dispute the contents but the CSH designated staff, in consultation with their direct supervisor, are not satisfied with the response, the individual is disqualified. The individual will be notified via the email provided in the background check that their ineligibility is upheld, and they are not qualified to be a Sponsor Circle member.

Sponsor Circle Notification of Ineligible Members and Sponsor Circle Re-Application

1. If an individual is ineligible for Sponsor Circle membership, CSH will notify the Sponsor Circle Coordinator that the individual does not qualify as a Sponsor Circle member. CSH will provide no other information regarding the nature of the ineligibility.
2. If an individual already associated with an SCU becomes ineligible for continued participation due to any circumstance described in the policy, CSH will notify the SCU that (i) the Sponsor Circle member does not qualify as a Sponsor Circle member, (ii) the individual and Sponsor Circle Coordinator were notified, and (iii) the Sponsor Circle may resubmit their application with a new member.
3. The Sponsor Circle cannot be certified with the ineligible individual(s) on the Sponsor Circle application.
4. The Sponsor Circle may resubmit a new application without the ineligible individual(s).
5. CSH will maintain a confidential list of individuals/Sponsor Circle for which concerns have been raised.

Other Sponsor Circle Requirements for Individual Members

In addition to clearing background checks as outlined above, each member of a Sponsor Circle must sign the Code of Conduct prior to participation. The Code of Conduct must be signed without alterations or exceptions to the stipulations in the document.