



D-Day Leadership Academy

Background-Check & Safeguarding SOP

Program: The Normandy Passage • **Owner:** DLA Director • **Effective:** [DD Mon YYYY] •
Version: 1.0

Motto: Reverence. Fortitude. Virtue.

1) Purpose

Protect youth and families. Meet legal duties. Keep sacred ground above reproach.

2) Scope (who is covered)

- **Tier 1 – Staff (DLA employees):** Director, Program Lead, House Ops.
- **Tier 2 – Cadre (direct youth contact, 1099):** Instructors, veteran mentors.
- **Tier 3 – Drivers / Media (incidental contact):** Van drivers, photo/video teams.
- **Tier 4 – Vendors with site access:** Caterers, rental reps, etc. (escort or check).

3) Roles

- **DLA Director (Owner):** Approves SOP, final adjudication.
- **Program Lead:** Initiates checks, tracks status, issues/denies badges.
- **Privacy Lead:** Ensures FCRA/GDPR compliance, data minimization.
- **Vendor (Screening Service):** Performs checks; secure portal; GDPR-compliant SCCs.

4) Vendor requirements

ISO 27001 or SOC 2; EU-GDPR capability (Art. 27 rep if needed); US FCRA compliance; international criminal coverage; MVR (US/EU); sanctions lists (OFAC/EU). SLA: **5 business days US, 10 business days international.**

5) Risk-based package (by Tier)

Component	T1 Staff	T2 Cadre	T3 Drivers/Media	T4 Vendors
Identity (gov't ID/passport)	✓	✓	✓	✓
National + county/state criminal (7 yrs)	✓	✓	✓	—/✓*
Sex-offender / crimes against children	✓	✓	✓	—/✓*
Global sanctions/watchlists	✓	✓	✓	✓
International criminal (residence/work abroad ≥6 mo in 7 yrs)	✓	✓	✓	—
Employment/ref checks (1 supervisor min)	✓	✓	—	—
Child-abuse registry (where legally accessible)	✓	✓	—	—
MVR / driving record (past 3–7 yrs)	—	—	✓ (required if driving)	—
Right-to-work (if hiring in EU)	—/✓	—/✓	—/✓	—
* Escort option: skip checks if vendor staff remain under DLA escort at all times on site.				

Optional (case-by-case): limited open-source review of professional social media for safety red flags (no protected-class screening; log only objective risks).

6) Disqualifiers & flags (adjudication matrix)

Automatic disqualifiers (any Tier):

- Registered sex offender; conviction for sexual offenses; crimes against children (any time).
- Violent felony in last **10 years**.
- Human-trafficking, hate crimes, or terror offenses (any time).

Role-specific disqualifiers:

- **Drivers:** DUI/DWI within **5 years**; >1 moving violation in **12 months**; license suspensions (past **3 years**).
- **Cadre/Staff:** Domestic violence conviction in **5 years**; restraining order involving minors or vulnerable adults (active).
- **Pending violent/sexual charges:** **Suspend** eligibility until resolved.

Reviewable flags (case-by-case): single non-violent felony >10 yrs; non-violent misdemeanors; expunged/dismissed matters (verify law). Use **three-person panel** (Director, Program Lead, Privacy) + documented rationale.

7) Re-check cadence

- **Annual** re-screen (all cleared roles).
- **MVR** within **30 days** of each cohort for assigned drivers.
- **Arrival attestation:** At link-up, each cleared adult signs “no new arrests/charges since clearance.”

8) Workflow (step-by-step)

1. **Initiate:** Program Lead enters candidate in portal; assigns Tier/package.
2. **Disclosures & consent:** Send FCRA + GDPR notices; collect e-signature; verify ID (passport for travel crews).
3. **Run checks:** Vendor executes package; ETA communicated.
4. **Review:** Program Lead compares report to matrix; mark **Green** / **Review** / **Decline**.
5. **Adjudication:**
 - **Green:** issue **Cohort Access Badge** (valid 12 months); log expiry.
 - **Review:** convene panel within **2 business days**; decide; document.
 - **Decline (US only):** follow FCRA **pre-adverse/adverse** steps (see §9).
6. **Onboarding:** Code-of-Conduct for adults working with youth; two-deep rule brief; mandatory reporter brief; sacred-site etiquette brief.
7. **Arrival check:** Passport match, attestation, badge issued. Anyone without **Green** status: **no youth contact, no site access**.

9) FCRA (US) adverse-action flow (if using a US consumer report)

- **Pre-Adverse Notice** to candidate with: copy of report + “Summary of Rights” + vendor contact.
- **Wait 5 business days** (or longer if law requires) for disputes.
- If unresolved and decision stands: **Adverse Action Notice** (final denial).
- Log timestamps and copies. (*Outside US, follow local law; in EU rely on vendor’s compliant process.*)

10) Youth safeguarding controls

- **Two-deep rule** at all times around minors.
- No closed-door one-on-one.
- No personal contact after lights-out; no private messaging.
- Report and log all concerns; escalate per call-tree.

11) Data protection & retention

- **Minimize:** Store **fit/no-fit decision** + date + package type + panel notes. Avoid keeping full reports where possible—retain in vendor portal.
- **Retention:** Decisions and panel notes **3 years** after last service; logs 3 years; MVR 1 year.
- **Access:** need-to-know only; encrypt at rest; restrict downloads.
- **Cross-border:** Vendor SCCs for EU data; no emailing reports; use portal links.

12) Exceptions

Director may grant **escorted access** for Tier 4 vendors in emergencies. No exception for Tier 2 Cadre or drivers.

13) Forms & artifacts (to attach/build)

- Adult Worker Code of Conduct (cadre/contractor).
- FCRA Disclosure & Authorization (US).

- GDPR Candidate Privacy Notice (recruitment).
- Pre-Adverse / Adverse templates (US).
- Arrival Attestation (no new charges).
- Adjudication Matrix (1-page quick guide).
- Badge template (name, role, expiry).

Adjudication Matrix — Quick Guide (attach to SOP)

Outcome	Examples	Action
GREEN	Clear checks; minor non-violent misdemeanor >5 yrs; clean MVR	Approve; issue badge
REVIEW	Non-violent felony >10 yrs; single MVR violation; older disorderly conduct	Panel review; documented rationale
DECLINE	Sex/child crimes; violent felony ≤10 yrs; DUI ≤5 yrs (driver); active restraining order; pending violent/sexual charge	Pre-adverse/adverse (US); decline role; offer non-youth role only if safe
