

HUMAN RESOURCES

Effective Date:
September 1, 2016

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2020

Supersedes:
**Background Check
Policy, Credential
Verification Policy**

Related Policies:
**Policy on Programs
Involving Minors**
**Policy on Background
Checks for Contractors
and Vendors**

**Responsible
Office/Department:**
**Human Resources
Management**

Keywords: background
check, credit check;
CPIC

Policy on Background Checks and Credential Verifications (CAN)

I. Purpose and Scope

Northeastern University is committed to promoting a safe and healthy learning, teaching, working, and research environment for students, faculty, and staff, and to furthering the safety and well-being of its enrolled students, employees, and volunteers. The university also recognizes the importance of protecting its property and funds and safeguarding and conserving university resources. In all hiring decisions, the university intends to select qualified individuals of the highest ethical standards. To assist the university in meeting these commitments, this policy sets forth the credential verification and other background information checks that will be conducted as a condition of employment.

This policy applies to all Candidates for employment (faculty and staff), current staff seeking promotional or transfer opportunities, temporary non-student employees, certain graduate students, current staff being assigned to certain new duties, including on an interim basis, all coaches (staff and volunteers), all faculty who travel with undergraduate students, volunteers who interact with students as part of their volunteer role, and students who are engaged to serve as Resident Assistants, as well as to students who serve as Teaching Assistants, Resident Assistants or in similar roles in international programs or in connection with university sponsored travel whether international or domestic.

Employees or volunteers who will supervise, coach, teach, or otherwise interact with minors in connection with a program for minors, as defined by the university's Policy on Programs

Involving Minors, will be subject to the provisions of that policy whether or not they also come within this policy.

This policy does not apply to employees of companies that contract with the university to provide services on campus, as those individuals are covered by the university's Background Check Policy for Contractors and Vendors.

II. Definitions

For purposes of this Policy:

A **Candidate** is an individual who has applied for employment with Northeastern University, who is already an employee but is applying for promotion or transfer to another position, or who seeks a volunteer role that includes interaction with students.

A **Selected Candidate** is the finalist for a position who will be or has been offered the position or volunteer role, contingent upon the verification and reviews required by this policy.

Engagement refers to the process by which volunteers are selected to serve certain roles within the university, such as Club sports coaches and assistant coaches, who interact with students as part of their volunteer role.

Hiring Unit refers to the office or department that will interview and select the Candidate for a position or volunteer role.

Credential and Reference Verification refers to the process of checking and verifying a Candidate's references, educational and employment history, and other information under Part III.A of this policy.

Criminal background check or **CPIC Check** refers to obtaining and reviewing the results of a Candidate's criminal history and may involve a Criminal Record Check, a Criminal Record and Judicial Matters Check, or a Vulnerable Sector Check (each as defined in the *Police Record Checks Reform Act, 2015* (or its successor legislation), or any similar form of criminal background check pursuant to any similar legislation in any Canadian jurisdiction in which the university carries on business..

CPIC refers to the Canadian Police Information Centre.

University-sponsored travel means academic or business travel with students taken by Northeastern faculty, staff, and/or administrators that is authorized, funded, coordinated or administered by Northeastern University. Such travel may include but is not limited to teaching, research, consulting, service, administrative work, field studies,

volunteer work, performances, athletic contests, and trips in connection with a university recognized student organization, academic or administrative unit.

Volunteers refers to unpaid coaches for club sports or other teams, and to any other unpaid volunteers for whom close interactions with students is part of their volunteer role.

III. Policy

A. Credential and Reference Verification

As a condition of employment or engagement, Candidates for all faculty, staff and volunteer positions who are selected for the position are subject to credential and reference verification. All information contained in the application form is subject to verification. The Hiring Unit is responsible for verifying professional references of all Selected Candidates. Human Resources Management (HRM) will coordinate verification of employment history and educational credentials. For certain positions additional verification or information is required, as indicated in Part B below.

For all faculty, staff and volunteers, the university requires:

- i. Verification of post-high school education credentials for those positions that specify an educational requirement.
- ii. Verification of actual employment dates for a minimum of the prior seven years.
- iii. A minimum of three professional work references with at least one from a former manager or supervisor.
- iv. For positions that require professional certification or licensure, HRM must obtain from the Selected Candidate a copy of a current license or registration, where applicable, or verify with the accrediting or licensing authority that the Selected Candidate is duly accredited or licensed, and that such accreditation or licensure is current.
- v. In limited circumstances where the need to fill a position is urgent, the Selected Candidate may be permitted to start in the position, conditioned upon the Hiring Unit's completion of the credential and reference verification.

B. Additional Employment Verification Requirements

i. For positions where the employee will be required to drive Northeastern vehicles:

When Selected Candidates or employees are expected to be driving university vehicles, the process may include verification of current, valid license and review of an employee's 3-year driving record. Driving records will be evaluated by the Human Resources Management department.

ii. For positions that require credit checks:

Some positions may warrant additional background checks, including credit checks. Positions where credit checks may be required include, but are not limited to, those in which the incumbent can sign university checks, wire-transfer money, negotiate or authorize arrangements or accounts with banks, or sign contracts, and their designees.

No credit check will be conducted without consent. The Hiring Unit must obtain written consent from the Selected Candidate or employee and forward the signed authorization form to HRM.

iii. For Officer and College Dean positions:

Given the breadth and range of responsibilities for these positions, including access to budgets and other sensitive financial information, the university requires a full background check to include the following:

- a) Verification of educational credentials
- b) Verification of actual employment dates for a minimum of seven years
- c) Multiple professional references
- d) Credit history

iv. Criminal Background Checks:

In addition to the verification of information required above, Northeastern University requires a CPIC Check for Selected Candidates and employees applying for, holding, applying for promotion to, or transferring into certain sensitive and confidential positions at the university and for positions for which a Criminal Background Check is or becomes required by law. Job postings generally

will indicate whether a CPIC Check is required and, if so, the required depth of the CPIC Check (a Criminal Record Check, a Criminal Record and Judicial Matters Check, or a Vulnerable Sector Check). In addition, criminal background checks will also be required for current staff or graduate students being assigned, even on a temporary basis, to positions or duties where such a check is required by law. Without limiting the foregoing, CPIC Checks may be required where the position involves any of the following:

- Unsupervised access to minors
- Access to computer infrastructure, systems, or applications with sensitive data or position providing computer security services
- Broad and extensive access to personally identifying information about students, faculty, staff, alumni, donors, or research subjects, including employee performance reviews, disciplinary actions and compensation
- Responsibility for conducting reviews, audits or investigations including of financial and operational systems
- Direct access to and handling of cash and cash equivalents
- Ability to modify business or financial records after transactions have been processed
- Public safety and campus security
- Coaching students as part of the university's athletics, club sports or intramural programs
- Travel with students, whether international or domestic
- Unrestricted access to building master keys, security systems, residence halls, athletic facilities, or areas where people have reasonable expectation of privacy.
- Authorization to receive or sign out controlled or scheduled drugs on behalf of a faculty investigator

Subject to and in accordance with applicable law, the criminal background check will be conducted in all jurisdictions where the Candidate has resided for a minimum of the last seven years.

The university reserves the right to require a criminal background check for any position or in any situation where it is deemed appropriate to protect the interests of the university. Hiring Units must confer with Human Resources Management about requiring a CPIC Check for any positions not coming within the parameters listed above, or not posted as a position requiring a CPIC.

- a) If applicable, the CPIC Check will be performed in accordance with the *Police Record Check Reform Act, 2015*, or similar legislation in any Canadian jurisdiction in which the university carries on business.
- b) Any Candidate with a criminal history will be subject to further review. A previous conviction does not automatically disqualify a Candidate and, in British Columbia, any criminal or summary conviction offence unrelated to the employment or to the intended employment will not be considered in determining a Candidate's eligibility for the position. In determining whether criminal charges and/or convictions will preclude Candidates from being hired, university officials will consider and determine suitability by considering factors that include, but are not limited to, the following:
 1. Age at time of conviction(s);
 2. Number of convictions;
 3. Nature of conviction(s);
 4. Severity of conviction(s);
 5. Length of time since conviction;
 6. Behaviour since conviction; and
 7. Any other potential risk factors to be weighed, including the relevance of the offense(s) to the position applied for.
- c) In accordance with provincial and federal law, no background check will be conducted without consent. The Selected Candidate or employee must personally authorize Northeastern University and/or its agent(s) to conduct a CPIC check. The Selected Candidate will be asked to sign an authorization form and then forward the signed form(s) to Human Resources Management. If the Selected Candidate or employee declines to sign an authorization, the individual will no longer be considered as a Candidate for the position.

- d) For positions requiring a CPIC Check, the Hiring Unit or department must notify Human Resources Management. In general, offers of employment will be made contingent upon a satisfactory background check.
- e) Should Northeastern University be considering an adverse decision based on the background check information, the Candidate will be notified of the potential adverse employment action, provided a copy of the background check report, and notified of the specific information in the CPIC Check that is the basis for the potential adverse action. The Candidate will be given a copy of this policy and will be provided the opportunity to dispute the accuracy of the information contained in the CPIC Check.
- f) Information obtained during the criminal background check that requires further review will be shared with the appropriate trained university official. The Hiring Unit must consult with Human Resources Management and the final decision will be made by the Human Resources Business Partner and the Director of Public Safety, in consultation with the area vice president, dean, or their designee.
- g) The university reserves the right to require incumbent employees to undergo additional CPIC Checks whenever the university reasonably deems necessary.
- h) Positions in Public Safety require a more comprehensive CPIC Check are conducted, and hiring approvals are made, by Public Safety officials.

C. Students Hired by the University for Certain Positions

- i. Resident Assistants and students with key card access. Students who apply to serve as Resident Assistants, or for jobs with Business Services, Facilities, or another university department for which they would be given key card access to residential halls, may be required to have a CPIC Check as a condition of securing the position.
- ii. Students engaged or volunteering as RAs, TAs or positions with similar responsibilities in connection with university-sponsored travel may be required to have a criminal background check as a condition of the position.

IV. Additional Information

A. At all times, Northeastern will adhere to the following procedures:

1. All CPIC Checks will be conducted in accordance with the *Police Record Check Reform Act, 2015* or its successor or replacement legislation, if applicable, or similar legislation in any Canadian jurisdiction in which the university carries on business.
2. All CPIC Check information is confidential. Access to CPIC Check information will be limited to those individuals who have a “need to know,” which may include, but not be limited to, hiring managers, staff submitting the CPIC Check requests, and staff involved with processing job applications.
3. Human Resources Management will maintain and keep current a list of individuals authorized to have access to, or view, CPIC Checks. The university will also ensure that authorized individuals will be trained on the applicable laws and regulations.
4. The university will maintain confidential files of all criminal history records, in a file separate from the personnel file, in accordance with its retention policy.

B. The university expects all members of the university community to adhere to and act in accordance with this policy. Managers in Hiring Units who do not meet their responsibilities under this policy may be subject to discipline up to and including termination for just cause. Falsification or omission of information in an application may result in an offer or appointment being rescinded or in discipline, up to and including termination for just cause, of an employee.

V. Contact Information

HRM Customer Service Center: 250 Columbus Place; (617)-373-2230;
HRMInfo@northeastern.edu