Policy on Background Checks and Credential Verifications (CA)

I. Purpose and Scope

Northeastern University is committed to promoting a safe and healthy learning, teaching, working, and research environment for all students, faculty, and staff, and to furthering the safety and well-being of our enrolled students, employees, volunteers, and visitors. 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 well-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 candidates for employment, to current employees seeking promotional or transfer opportunities, and to current employees being assigned new duties, including on an interim basis, that require a Criminal Background Check.

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

A Candidate is an individual who has applied for employment with Northeastern University, or who is already an employee but is applying for promotion or transfer to certain positions.
A **Selected Candidate** is the finalist for a position who will be or has been offered the position, contingent upon the verification and reviews required by this policy.

**Hiring Unit** refers to the office or department that will interview and select the candidate for a position.

**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).

**CPIC** refers to the Canadian Police Information Centre.

### III. Policy

#### A. Credential and Reference Verification

As a condition of employment, candidates for all faculty and staff positions who are selected for hire 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 employment history, educational credentials, and professional references of all selected candidates. For certain positions additional verification or information is required, as indicated in Part B below.

For all faculty and staff, the university requires:

1. Verification of post-high school education credentials for those positions that specify an educational requirement.
2. Verification of actual employment dates for a minimum of the prior seven years.
3. A minimum of two professional work references from a manager or supervisor.
4. For positions that require professional certification or licensure, the hiring unit must obtain from the selected candidate a copy of a current licence 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.
5. 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 that require credit checks:

Some positions may warrant additional background checks, including credit checks. Positions where credit checks are 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 Human Resources Management.

ii. Criminal Background Checks:

In addition to the verification of information required above, the 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. 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). The CPIC Check will be conducted in all jurisdictions where the candidate has resided for a minimum of the last seven years. Criminal background checks may be conducted for positions of exceptional trust with students, as well as positions providing extensive and unmonitored access to confidential files or sensitive data. Criminal Background Checks will be conducted for positions for which a Criminal Background Check is or becomes required by law.

The university reserves the right to require a CPIC 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) The CPIC Check will be performed in accordance with the Police Record Check Reform Act, 2015.

b) Any candidate with a criminal history will be subject to further review. A previous conviction does not automatically disqualify a candidate. 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
7. Any other potential risk factors to be weighed, including the relevance of the offence(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 hiring unit will ask the selected candidate 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, the CPIC Check will be completed before an offer of employment has been made; in certain cases an offer can be made contingent upon a satisfactory background check. The hiring unit will bear the cost of the check.

e) Should the university be considering an adverse decision based on the background check information, the candidate will be notified of the potential adverse employment action 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 CPIC 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 Management Consultant and the Director of Public Safety, in consultation with the area vice-president or his/her 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 requiring a more comprehensive CPIC Check are conducted, and hiring approvals are made, by Public Safety officials.

IV. Additional Information

A. 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.

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: (617)-373-2230; HRMInfo@northeastern.edu