GUIDELINES relating to BACKGROUND CHECKS

Policy:
St. Norbert College conducts background checks as a part of its employment process. The College also conducts background checks for individuals who will provide services on a voluntary basis. St. Norbert College complies with all applicable federal, state and local laws, including fair employment practices and equal employment opportunity, when conducting background checks. Such checks may include arrest/conviction records and/or credit reports.

Arrest and conviction records
The College may check criminal arrest and conviction records as part of the applicant selection process. In accord with the Equal Employment Opportunity Commission’s current interpretation of Title VII of the Civil Rights Act of 1964, this information cannot be used as a basis for denying employment, unless it is determined to be job-related and consistent with business necessity.

Credit report
The College may collect credit information on applicants consistent with the guidelines set forth by the federal Fair Credit Reporting Act (FCRA). The FCRA requires organizations to obtain a candidate’s written authorization before obtaining a credit report. When doing this, the employer must:
- Certify to the consumer-reporting agency that the employer is in compliance with the FCRA and will not misuse the information it receives.
- Disclose to the applicant or employee, on a separate form, its plans to obtain a consumer or investigative consumer report and that the information received will be used solely for employment purposes.
- Inform the individual of his or her right to request additional information on the nature of the report and the means through which such information may be obtained.
- Inform the applicant that the report will include information about the individual’s character, general reputation and personal characteristics.
- Provide the individual with a summary of his or her rights under the FCRA.

If the results of the credit check are negative, St. Norbert College will inform the applicant before taking adverse action based on the results, provide the applicant with a Statement of Consumer Rights from the Federal Trade Commission, offer the applicant the opportunity to review a copy of the credit report, and advise the applicant of his or her rights to dispute inaccurate information. Applicants should be granted reasonable time to dispute the information (approximately three to five days).

Positions having contact with or working with minors
If an employee or volunteer, regardless of SNC student status, is intended to interact with minors, a current background check must be completed before the start of employment or subsequent reemployment.
DISCRETIONARY GUIDELINES relating to BACKGROUND INVESTIGATIONS

Purpose:
St. Norbert College believes that hiring or engaging qualified individuals contributes to its overall strategic success. Background checks serve as an important part of the selection process. The information collected helps St. Norbert College promote a safe work environment for our current and future community members – students, employees, and visitors. Background checks also help the College obtain information necessary to determine an applicant’s overall employability and to ensure the protection of its physical property and other assets.

Scope:
These guidelines apply to full and part-time regular employees, direct temporary employees and volunteers. They also apply to rehires who have not been employed on a continuous basis.

If an employee has previously worked for St. Norbert College in a paid position, he/she would be required to complete a background check release form in HR, as well as verify that other paperwork is current.

Previous or anticipated student employment does not eliminate this requirement. (Active students of the College must contact Financial Aid to determine what documentation is necessary for employment.)

Record-Keeping:
St. Norbert College assures applicants that all information obtained from the background check process will only be used as part of the employment process and will be kept strictly confidential. St. Norbert College human resources will maintain a log that will include the position you are applying for, your name and the date of the background check. Only appropriate human resource personnel at St. Norbert College will have access to this information. St. Norbert College complies with all federal and state laws regarding the collection, storing and disposal of applicant information, such as the Fair and Accurate Credit Transactions Act (FACTA).