

**BACKGROUND CHECK POLICY**  
*For the College of Saint Benedict and Saint John's University*

**I. PURPOSE**

The College of Saint Benedict (“CSB”) and Saint John’s University (“SJU”) are committed to creating and maintaining a safe and secure learning and working environment for its faculty, staff, students, volunteers, and visitors. CSB and SJU have established a Background Check policy and process. Background checks are completed to ensure accuracy of employment information received and to ensure CSB and SJU have taken reasonable care in identifying any criminal convictions which could pose a threat to the campus communities.

**II. POLICY STATEMENT**

It is the policy of CSB and SJU to conduct pre-employment background checks. Pre-employment background checks will apply to faculty, staff and intern positions. In addition, background checks will be conducted for rehired employees and for current employees who move to a substantially different position or assume additional roles requiring a background check (e.g. security-sensitive positions; faculty directing a study abroad program, faculty moving to administration). Background checks for volunteers may also be conducted where deemed appropriate based on the nature of the campus event and volunteer assignment.

The pre-employment background check for a tenure-track faculty position will occur prior to semi-finalist candidates being invited for an on-campus interview. The pre-employment background check for an adjunct faculty position and for a staff position will occur following a candidate’s acceptance of a contingent offer of employment.

**A successful background check must be completed prior to an individual beginning work in any capacity with CSB or SJU, and prior to providing volunteer service for events where a volunteer background check is deemed appropriate.** In the event of an emergency hiring scenario, an exception to this requirement is subject to the pre-approval of the Human Resources Director and the Divisional VP (for staff positions) or Provost (for faculty positions).

The CSB and SJU Human Resources department will conduct and oversee the background check process utilizing a contracted third party vendor. The college and university reserve the right to make the sole determination concerning the significance of information received through a background check and any employment decision arising from the background check. Determinations for faculty positions will be made by the Provost in consultation with the Human Resources Director or Employment Manager, President(s), and legal counsel. Determinations for staff positions will be made by the Divisional VP in consultation with the Human Resources Director or Employment

Manager, President(s) and legal counsel. (*See sections on Relevancy of Information and Confidentiality*).

### **III. SCOPE**

All background checks for faculty, staff, and intern positions will include: a social security number verification, criminal history check, and national sex offender registry check. Positions subject to requirements of licensing boards may require additional checks (e.g. nursing, education) and will be managed by the hiring department.

The requirements of a staff or intern position may necessitate additional checks, including but not limited to: a credit report, driving record, and pre-employment physical. Staff or intern positions requiring a *Kari Koskinen* background check (see Minnesota Statutes 299C.66 to 299C.71) may require a finger print check through the Bureau of Criminal Apprehension (BCA) for individuals with less than 10 years of residency in Minnesota.

### **IV. CONFIDENTIALITY**

Background check information will be confidentially maintained in the Human Resources department separate from an individual's personnel file. Report contents received by the Human Resources Employment Manager and/or Director of Human Resources will be shared with the parties, as outlined in Section II and, in the case of staff positions, with others who have a legitimate business reason to be informed (e.g. supervisor).

### **V. RELEVANCY OF CONVICTIONS AND DETERMINATION**

A criminal conviction will not automatically disqualify an individual from employment. The college and university will consider multiple factors in making an employment determination, including: the nature and frequency of the conviction(s); time of conviction; completion of sentence or any other requirements; and relevancy of the type of conviction to the responsibilities of the position.

As outlined in Section II, *Policy Statement*, the determination will be made by the Provost or Divisional VP in consultation with Human Resources staff, President(s), and legal counsel.

If the information obtained may lead to a decision to discontinue further consideration of a semi-finalist or to withdraw a conditional offer of employment, the Human Resources department will send the candidate a Pre-Adverse Action Notice including a copy of the background check report and a notice of rights under the Fair Credit Reporting Act (FCRA). If the candidate does not dispute the accuracy of the report and a decision is made to discontinue further consideration of a semi-finalist in the recruitment process or to rescind a conditional offer of employment, a Final Adverse Action Notice will be issued to the candidate.

## **VI. PROCEDURE**

The [background check procedures](#) associated with this policy may be found on the Human Resources intranet site.

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