BACKGROUND SCREENING POLICY

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Compassion UK and Compassion Ireland ("Compassion") reserve the right to review, amend, modify, and update its policies and procedures at any time and without prior notice to adapt to changing business needs, legal requirements, and best practice.

Please Note: Printing this document may make it obsolete.

BACKGROUND SCREENING POLICY

1. INTRODUCTION

Compassion UK and Compassion Ireland ("Compassion") is committed to promoting a safe and secure working environment and protecting everyone who comes into contact with the organisation, from all forms of harm, abuse, neglect, and exploitation.

Compassion strives to ensure it applies rigorous recruitment and selection processes and robust practices to deter, identify, and reject individuals who may pose a safeguarding risk, and ensure that it employs or engages people who are reliable, suitable, and safe.

Compassion is a participating member of the Misconduct Disclosure Scheme and recognises that sharing relevant information with other participating organisations as part of the reference checking process, helps to prevent people who may pose a safeguarding risk from moving between organisations undetected.

2. PURPOSE

The purpose of this policy is to set out Compassion's approach to the disclosure and receipt of relevant, accurate, and reliable information, in compliance with all applicable laws on conducting background checks, to make informed recruitment and selection decisions.

3. SCOPE

This policy applies to Compassion employees and trustees involved in recruitment and selection processes and candidates, including volunteers, who go through the process. It also includes those employees involved in providing a reference for anyone that Compassion is currently or has previously employed or engaged.

This policy is intended to cover applicable background checks which include the following:

- Right to work checks - to verify a candidate's identity, eligibility, and entitlement to work (including voluntary work) in the UK and/or the Republic of Ireland.
- References - to validate a candidate's skills, experience, and suitability for a role.
- Driving licence checks - to ensure validity of driving licences for candidates whose roles require them to have a company car or drive as an essential part of their job. This does not apply to driving in a personal capacity using a non-company car. In such cases, individuals are personally responsible for their compliance with any legal obligations of drivers.
- Disqualification checks - to verify that candidates for certain trustee and senior manager roles are not disqualified by relevant legislation to act in those roles, even on an interim basis.
- Criminal record checks - to assess a candidate's criminal record to determine suitability for roles in line with applicable legislation. This requirement is applicable to Compassion UK only due to legislation divergence between UK and the Republic of Ireland on the eligibility to conduct such checks.
- Compassion reserves the right to review candidates' social media profiles as part of the background screening procedures if they have progressed beyond the shortlisting stage.

Compassion has separate policies which cover:

- The recruitment and selection procedures for both short and long-term vacancies ('Recruitment and Selection Policy and Procedure').
- The reviewing of candidates' social media accounts during the recruitment and selection process before inviting them for interview ('Social Media Policy')

- The approach (applicable to Compassion UK only) towards engaging people with a criminal record. ('Policy on Engaging People with a Criminal Record').

The detailed guidance and procedures on how to implement the standards set out this 'Background Screening Policy' are documented separately as outlined in the 'Appendix 1 – Implementing Procedures'.

This is a shared policy that covers Compassion UK and Compassion Ireland under the same policy. Where relevant and applicable, some aspects of the policy may be customised to ensure compliance with relevant laws and regulations for each entity.

In the event of any conflict or inconsistencies between the policy and applicable legislation for each entity, the legislation will always take precedence.

4. STANDARDS

4.1. There is no statutory obligation for Compassion to give references relating to current or former employees, trustees, or volunteers. However, Compassion will usually provide basic factual information about the terms of employment or engagement which can be adequately defended if challenged.

4.2. All reference requests relating to current or former employees, trustees and volunteers of Compassion will be responded to by the People and Culture Team, Company Secretary and Volunteer Team respectively, who will ensure that any reference provided is accurate and in line with this policy.

4.3. Employees or trustees who participate in any aspect of the recruitment and/or selection process including providing references, are expected to have clear knowledge, and understanding of the provisions of this policy and its implementing procedures.

4.4. Compassion will ensure this policy and implementing procedures are updated in line with and guided by relevant legislation and codes of practice.

4.5. Compassion will endeavour to ensure that its background screening processes are inclusive and fair, and that no candidate receives less favourable treatment that is unlawful on the grounds of:

4.5.1. **Protected Characteristics** - disability, gender reassignment, marriage or civil partnership, race (including colour, nationality, ethnic or national origin), religion, or belief, gender, sexual orientation, and pregnancy and maternity. (*Applicable to Compassion UK*)

4.5.2. **Nine Grounds** - gender, civil status, family status, sexual orientation, age, disability, race (including colour, nationality, ethnic or national origin), religious belief and membership of the traveller community. (*Applicable to Compassion Ireland*)

4.6. Compassion will ensure it pre-determines, based on risk assessments, when it is proportionate, relevant, and legal to conduct appropriate background checks and character references for any role, as a conditional offer of employment or engagement.

4.7. Compassion is a participating organisation of the Misconduct Disclosure Scheme. Any behaviour which meets the threshold for misconduct involving sexual exploitation, sexual abuse or sexual harassment as defined by the United Nations, will be requested by Compassion or disclosed to any organisation requesting such information, including whether such disciplinary matters are under investigation, unless Compassion is legally prohibited from doing so.

4.8. Background checks will only be conducted once a conditional offer of employment or engagement has been made and accepted, with the exception of Right to Work checks.

4.9. All offers for employment or engagement are made subject to satisfactory background checks. Candidates will be informed of what checks Compassion plans to carry out and how these will be done.

4.10. A prospective employee, trustee or volunteer should not start their role without satisfactory completion of the relevant background checks.

4.11. Relevant re-screening of criminal record checks should be conducted between every two to three years post-employment or engagement, or where there has been a role change where more risk is involved (Compassion UK only).

4.12. When advertising vacancies, Compassion will use this as a first opportunity to promote its zero-tolerance statements on all forms of harm, abuse and maltreatment and deter unsuitable applicants.

4.13. Compassion recognises that background checks cannot reliably predict an individual's future performance or behaviour and recruiting managers should consider the information disclosed during the screening in the wider context of other evidence obtained about the candidate throughout the selection process.

4.14. When requesting references, no assertion should be made as to their confidentiality. This is because individuals can exercise their information rights under applicable laws to request copies of information Compassion holds about them, including references.

4.15. Where necessary and appropriate, Compassion may use reputable external companies that provide pre-employment screening service.

4.16. Appropriate documents and records of the background screening process will be maintained in line with Compassion's 'Data Protection Policy' and 'Records Retention and Disposal Policy.'

5. ASSOCIATED POLICIES AND PROCEDURES

The following policies are linked, connected, co-related or relevant to this policy. The implementing procedures are subset of this policy and provide detailed guidance on how to implement the standards set out in this policy.

Associated Policies

- Recruitment & Selection Policy and Procedure
- Equality Equity Diversity and Inclusion Policy
- Data Protection Policy
- Record Retention and Disposal Policy

Implementing Procedures

- Background Screening Procedure
- Basic DBS Check Guidance for Applicants
- Reference Request Form and Guidance for Applicants
- Statement of Conduct Form
- Self-Disclosure Statement Form
- Criminal Record Assessment Form

6. POLICY APPROVAL AND REVISION HISTORY

Review Frequency: This policy will be reviewed and approved every three (3) years.

Version Number	Approval Date	Changes Made
V1.0	22 January 2019	
V2.0	05 July 2024	New single policy document that covers Compassion UK and Compassion Ireland under the same policy.