



BACKGROUND CHECKS

In order to assure that prospective employees do not have personal histories of credit, criminal or vehicle operations problems that would make them ineligible to serve in certain positions, the College performs credit and criminal background checks during the hiring or promotion process. While this policy identifies particular positions for which such checks will be regularly performed, the College reserves the right to perform credit and criminal background checks for other positions or in individual circumstances whenever it is deemed appropriate to protect the College, its employees or its students.

Credit Background Checks

Credit checks will be conducted by the Director of Human Resources as part of the hiring (including promotion) process for Public Safety Officers and for individuals holding positions which allow significant access to College funds, including the following positions:

- Vice President for Finance and Administration
- Associate Treasurer
- Comptroller
- Assistant Treasurer
- Cashier (Financial Services)
- Back-up Cashier (Financial Services)

Also included are individuals in Human Resources or Payroll who have authorization to establish automated clearing house (ACH) transactions.

Prior to taking any adverse employment action based on information contained in a credit history record check report obtained from a consumer reporting agency, Human Resources will provide the employee or candidate a copy of the report and a notice summarizing the individual's rights under the Fair Credit Reporting Act. The employee or candidate will also be given information on the credit reporting agency providing the report and a reasonable opportunity to submit information to Human Resources disputing the accuracy or completeness of the report before a final decision is made and communicated.

If Human Resources and the hiring supervisor decide to take adverse action based on the consumer report, they will provide an adverse action notice to the individual. The notice will include: the name, address and telephone number of the consumer reporting agency that supplied the report; a statement that the consumer reporting agency supplying the report did not make the decision to take the adverse action and cannot give specific reasons for the action; and a notice of the individual's right to dispute the accuracy or completeness of any information the agency furnished and to receive an additional free consumer report from the agency upon request within 60 days.

Criminal Offender Record Information (CORI) and Sexual Offender Record Information (SORI) Checks

CORI checks will be conducted by the Director of Human Resources as part of the hiring (including promotion) process for all members of the Financial Services, Payroll, Auxiliary Services, Student Financial Services, Technology, Infrastructure and Systems Support and Campus Technology and Media Support Departments, the Associate Director for Budget, Procurement and Planning in LITS, for all employees who have significant contracting authority (over \$50,000), and for volunteer religious advisors who are not College employees. CORI checks for the Three College Public Safety Department will be conducted by the Director of Public Safety or his/her designee. Controlled substance CORI checks are also conducted by the Director of Human Resources for students working with controlled substances as part of their academic program under the license of a faculty member.

SORI checks will be conducted by the Director of Human Resources as part of the hiring (including promotion) process for all members of the staff, including those in the Facilities Management, Residential Life, Public Safety, Physical Education and Conference and Events Services Departments, who have regular access to the residence halls or have the opportunity in the course of their jobs to be in a one-on-one encounter with minors (under age 18) who are attending conferences being held on campus. These background checks are conducted in accordance with Massachusetts law governing "summer camps" that host minors.

In reviewing the content of any criminal record, the reviewer will consider any record of conviction, especially those related to financial crimes (e.g., embezzlement, larceny), violent crimes, crimes against children and drug-related crimes, to be of concern and a potential disqualifier for employment with the College.

Driving Records

As part of the College's driver credentialing program, all employees who are hired to drive for the College or who drive vehicles owned or leased by the College (including rental cars used for travel on behalf of the College) are required to provide their driver's license information and driver's history report using the on-line credentialing system. .

June 16, 2011