



BACKGROUND CHECK POLICY

POLICY STATEMENT & PURPOSE

Ettalong Diggers is committed to the highest standards of conduct and ethical behaviour. Staff and the Board of Directors have all agreed that one of the values important to the Club is Honesty and Integrity.

The objective of this policy is to provide a framework for Ettalong Diggers to achieve its obligations with regard to legislative requirements, ensure that we hire the best people for the job required and to ensure that candidates are provided a fair opportunity to be considered for job vacancies.

Scope

This policy applies to all aspects of recruitment and selection, including external recruitment of new positions, replacement staff, and internal job listings for promotion or job transfer and may also be considered guideline for assessing team member suitability for training and development opportunities.

This policy will be made available via the Ettalong Diggers website (Employment) and at the following location:

H:\General\Policies\HR\Completed

POLICY

Checks

The various roles within Ettalong Diggers have different requirements. The exact type of background checks to be applied at each recruitment stage will be determined depending on the exact role. The following is a summary of the types of checks which may be considered:

- Employment reference checks;
- Character / personal references;
- National Police Check;
- AML/CTF check;
- Driving record check;
- VEVO Check; Visa Entitlement Verification Online

Identified offences or convictions

National Police Checks or AML/CTF checks, will be completed for final candidates for most roles, including Operations Attendants and Administration.

Criminal records don't automatically disqualify candidates from the hiring process. We will judge the substance of criminal records according to these criteria:

- Number of criminal convictions for the same offense.
- Time elapsed from the most recent criminal conviction.
- How the criminal conviction relates to the position.

The Club will determine if the person's particular criminal record means that they are unable to fulfil the inherent requirements of the job.

PROCEDURE

Job identification and advertising

Before commencing recruitment for a role, the Hiring Manager in conjunction with the Human Resources Manager, will determine the requirements of the role and the relevant recruitment steps. This includes how and where the position is advertised as well as the checks required for candidates to be assessed against to determine the successful applicant(s).

If required, the need for a National Police Check/ AML/CTF check and/or a driving record check should be included in the job advertisement.

Applications and screening

The screening section of the application form online will be tailored to advise candidates of the requirement (if any exists) for background checks as a criteria for employment in the role advertised. Candidates will not be required to disclose convictions at the time of application, however will acknowledge that checking such as a National Police Check will be required to progress through the application.

Interview

During the interview for a position, the interviewer must make the candidate aware of the steps involved in the recruitment process if they are progressed past the interview stage.

The interviewer should remind candidates that having a recorded criminal conviction does not preclude a candidate from being successful, rather each situation is assessed individually. If the candidate check returns an indication of one or more convictions, more detail may be requested so the Hiring Manager can make a decision regarding whether the conviction is relevant to the application outcome or not.

Background checks

Permission from the candidate must be obtained in writing (or in the online police check application process) before submitting the check.

The candidates being progressed to National Police Check should be informed of the process involved, the time required to complete the check and how the information will be treated.

If a conviction is reported on the police check, the Human Resources Manager should contact the candidate to give an opportunity to provide any additional detail or explanation prior to a decision being made.

ASSESSING RELEVANCE OF CRIMINAL RECORDS & OTHER RECORDS

To be able to determine if a criminal record is relevant to the role and tasks required of a potential employee, the inherent requirements of the role must be understood first. Information for this can be sourced from Job Descriptions and Duty Agreements, as well as a recruitment briefing with the Hiring Manager. Some commonly identified areas are listed below:

Role	Conviction	Relevance	Considerations
Operations Attendant	Fraud, forgery, Good Faith or similar offences relating to dishonesty. Money Laundering offences.	Represents an increased risk of ML/TF	
All	Any conviction relating to terrorism	Represents an increased risk of ML/TF	
Operations Attendant – bus driver	Driving under the influence, Drive disqualified, any other offence relating to traffic or driving offences	History of driving offences indicates a risk to the health and safety of passengers and to Club property and reputation.	Overall driving history will be considered, with particular scrutiny of the last 5 years.
All	Theft, robbery, fraud	This represents too great a risk to our business which is heavily reliant on the trusted position of cash-handlers.	

NOTE: ML/TF refers to money laundering and terrorism financing which are criminal activities. Due to the nature of our business, Ettalong Diggers is a reporting entity and the AML/CTF Rules requires employee screening be undertaken.

RELATED DOCUMENTS AND LINKS

Ettalong Diggers Privacy Policy

Ettalong Diggers AML/CTF Program

<https://www.service.nsw.gov.au/transaction/apply-driver-licence-check-service>

Policy Name:	Background Check Policy	Policy Number:	HR012 v1.2
Effective Date:	19 th July 2019	Last Reviewed:	7 th January 2020
Approved by:	Mardi Belle	Version notes:	Updated to reflect AML check completed for Ops Attendant in most cases rather than full Police Check.