

KPN Security Policy



KSP – Rule

Title	Pre-employment screening	<pre>graph TD; A[Top level policy (mandatory)] --> B[Standards (mandatory)]; B --> C[Rules (mandatory)]; C --> D[Guidelines (supporting)]; D --> E[Tools (supporting)];</pre>
ID	KSP-FA02-RL01	
Funct. Area	02 – Human Resources Security	
Date	3 February 2017	
Version	v1.5	
Status	Approved	
Owner	CSO	

Summary

This rule governs the way in which pre-employment screening is controlled within KPN. The requirements are applicable for both internal and external staff. Internal staff are those employees employed directly by and on the payroll of KPN, either temporarily or permanently. External staff are those employees employed by another organization but working at or for KPN on contract or secondment, such as agency or service staff, consultants, contractors etc.

Version history

Version	Date	Comments
v1.0	20 August 2013	Approved in SSM
v1.1	9 October 2013	Updated based on consistency check
v1.2	1 August 2014	Update references, no substantial changes
v1.3	13 November 2015	Update references, no substantial changes
v1.4	5 February 2016	Update hyperlinks, no substantial changes
v1.5	3 February 2017	R02: textual tightening New R06: requirement regarding black list

Disclaimer

The content of this document is to describe KPN's policy on this specific topic. If and when this document is partly or fully disclosed to parties outside of KPN, it's important to hereby note towards those parties that this contains KPN's intended policy and cannot in any way be read or construed to be an explicit or implied formal guarantee or promise that its content can always be fully executed or complied to.

ID	KSP-FA02-RL01-R01
Title	<u>Screening CAO-employees</u>
Description	<p>All new CAO-employees must be screened in line with the standard KPN pre-employment screening. The manager must conduct the screening; relevant documents must be filed in the employee personal file.</p> <p>Contractors must follow KPN's screening procedures. The screening must be conducted by the contractor. Relevant documents (<i>'formulier aanstellingsonderzoek'</i>) must be signed by contractor and employee and must be handed over to KPN.</p>
Relating document	<p>KSP-FA02-ST01 - Personnel Security</p> <p>CAO-screening (TEAMKPN HR: 'Aanstellingsonderzoek')</p>

ID	KSP-FA02-RL01-R02
Title	<u>Screening PAO-employees</u>
Description	All new PAO-employee must be screened in line with the extensive KPN PAO pre-employment screening. In case of an internal change of position to a PAO D-E or financial PAO-C-position, an in employment screening must be conducted. For PAO D/E-positions and financial PAO-C-positions, the screening procedures must be repeated every 5 years.
Relating document	KSP-FA02-ST01 - Personnel Security PAO-screening (TEAMKPN HR: 'Aanstellingsonderzoek')

ID	KSP-FA02-RL01-R03
Title	<u>Screening 'Positions involving Confidentiality' (<i>Vertrouwensfuncties</i>)</u>
Description	Employees with a 'Position involving Confidentiality' must be screened by the General Intelligence and Security Services, Ministry of the Interior and Kingdom Relations. The positions are appointed by the Minister of Economic Affairs in accordance with the Minister of the Interior and Kingdom Relations. The list of all 'positions involving Confidentiality' within KPN is centrally maintained and managed by KPN Security.
Relating document	KSP-FA02-ST01 - Personnel Security Brochure (website AIVD)

ID	KSP-FA02-RL01-R04
Title	<u>Screening BBGT-positions</u>
Description	Employees in “BBGT positions” (Lawful Interception) must have ‘security clearance’ in line with BBGT-requirements.
Relating document	KSP-FA10-RL02 - Security of Lawful Interception & Lawful Disclosure

ID	KSP-FA02-RL01-R05
Title	<u>Screening requirements in contracts</u>
Description	<p>In case of outsourcing services, specific screening requirements must be part of the supplier contract. Outsourcing partners must conduct a background verification check in accordance with business requirements (including customer agreements), classification of the information to be accessed and the perceived risks. In case of outsourcing to other countries, the screening must be in accordance with relevant local laws and regulations and must at least have the same level as KPN's screening policy in the Netherlands.</p> <p>Individual screening documents do not need to be handed over to KPN; KPN's right to audit must be part of the contract.</p> <p>Client specific screening requirements are excluded from this rule; these business requirements depend on client specific policies, laws and regulations and must be part of the client contract.</p>
Relating document	KSP-FA07-documents

ID	KSP-FA02-RL01-R06
Title	<u>List unwanted persons</u>
Description	<p>As part of the pre-employment screening, a check is being executed on the list unwanted persons. Goal is to prevent re-hiring employees who have been fired as a result of:</p> <ul style="list-style-type: none"> - committing fraud or theft - deliberate violation of the Telecommunications and/or Competition Law - serious misuse of information and communication company assets - demonstrating serious misbehaviour like discrimination, bullying, (sexual) harassment - deliberate violation of other laws and regulations, <p>while executing their work with or on behalf of KPN.</p> <p>This check is being executed in conformity with verification criteria of the Privacy Authority and in accordance with the guideline below.</p>
Relating document	KSP-FA02-GL01 - List unwanted persons