

HR102   
Record Checks Policy

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Document Control

The electronic version of this document is recognized as the only valid version.

Approval History

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| APPROVER(S) | TITLE/DEPARTMENT | APPROVED DATE |
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## Document Sensitivity Level

Confidential

Introduction

Overview

Signifi will comply with all federal and provincial legislation regarding the protection of human rights for applicants when conducting any type of record check.

Purpose

Signifi strives to hire the most qualified individuals to fill positions that will contribute to the overall success of the organization. Record checks act as an important part of the selection process at Signifi.

Audience

This policy applies to all Signifi employees, part-time and temporary workers, trainees, contractors, and vendors.

Scope

This policy applies to all users which include but not limited to employees, contractors, part-time and temporary workers, trainees, representatives, service providers, and those employed by others to perform work at hosted or outsourced sites, or who have been granted access to Signifi information or systems (“associates”). This policy applies to all Signifi resources owned, leased, or supported by Signifi, or any outside entity that has signed a Vendor Access Agreement with Signifi.

Policy Statement

1. Definitions

Criminal Record Checks – This type of check will include the following information:

* Criminal convictions from the Canadian Police Information Centre, RCMP National Repository of Criminal Records and/or other local and national police databases;
* Outstanding entries, such as charges, warrants, judicial orders, Peace Bonds, Probation and Prohibition orders (or equivalents if the associate is not a Canadian resident); and
* Absolute and Conditional Discharges (or equivalents if the associate is not a Canadian resident)

Police Record Checks – This type of check includes the following information:

* Criminal convictions from the Canadian Police Information Centre, RCMP National Repository of Criminal Records and/or other local and national police databases.
* Outstanding entries, such as charges, warrants, judicial orders, Peace Bonds, Probation and Prohibition orders (or equivalents if the associate is not a Canadian resident);
* Absolute and Conditional Discharges (one to three years); Family court restraining orders (or equivalents if the associate is not a Canadian resident);
* Criminal charges resulting in dispositions including, but not limited to, Stayed, Withdrawn, Dismissed, and cases of not criminally responsible by reason of mental disorder as listed on local indices (or equivalents if the associate is not a Canadian resident); and
* Police contacts including, but not limited to theft, weapons, sex oﬀences, or violent, harmful or threatening behaviour.

1. Guidelines

Bona Fide Occupational Requirement

Signifi shall establish that a position has a bona fide occupational requirement where a record check serves a legitimate purpose prior to requesting a record check from any applicants.

The Supreme Court of Canada has set out a three-step test for justifying a discriminatory standard, factor, requirement or rule as a bona fide occupational requirement. In general, the requirement should be:

* + For a purpose or goal that is rationally connected to performing the job.
  + Adopted in the belief that it is necessary to fulfill a legitimate work-related purpose; and
  + Reasonably necessary to accomplish the work-related purpose.

As a result of this test, the rule or standard must be inclusive and must accommodate individual diﬀerences up to the point of undue hardship. An example of undue hardship is when the health and safety of others is put at risk.

Signifi shall only request record checks should there be a legitimate purpose for the position. The type of record check which Signifi shall request will be determined based on the type of position being hired for.

Before Requesting a Record Check

Signifi shall only request that a candidate consent to a record check following standard hiring procedures, and after providing the candidate with a written job oﬀer, conditional upon a satisfactory outcome.  
Signifi shall only request that an associate consent to a record check before a contract of any type is signed between the associate and Signifi, or if there is a change in role or access rights for that associate.

Requesting a Record Check

Should a record check be a requirement for a position or for representation, Signifi will explain to the applicant or associate what type of record check is required, and why it is needed.

If it is a requirement for a position, Signifi will carefully review all the information before making a conditional oﬀer. When the oﬀer is made, the individual must be asked for his/her consent where a record check is required.

Results of a Record Check

Although disqualification from Signifi employment or representation is possible, a previous conviction does not automatically disqualify an applicant or associate from consideration for employment or representation with Signifi.

Based on a variety of factors (e.g., the nature of the position, the nature of the conviction, when the conviction occurred), the candidate or associate may retain eligibility for employment or representation with Signifi. Signifi shall review the results of the record check to see if it is relevant to the job or position. In the event that the results of a record check are not satisfactory for the position, Signifi will withdraw any conditional oﬀers made. In the event that the results of a record check are not satisfactory for representation, Signifi will withdraw the associate’s representation rights.

If an applicant or associate attempts to withhold information or falsify information pertaining to any previous convictions, the applicant or associate will be disqualified from further employment consideration in any position with the company, or from any type of representation, due to falsification of an application.

Signifi shall ensure that all applicant or associate information is kept confidential.

Enforcement

All instances of non-compliance will be reviewed by the department director. The department director, with the assistance of the Human Resources department has the authority to impose disciplinary actions, up to and including termination of employment or contractual agreement.

Update

This policy and all supporting documentation will be reviewed and updated annually or upon material changes to Signifi business rules, technology processes, organizational goals, or information security objectives to ensure its continuing suitability, adequacy, and effectiveness.

Revision History

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| VERSION | DATE | SUMMARY OF CHANGE | CHANGED BY |
| 1.0 | 2019-12-09 | First draft | Darace Rose |
| 1.01 | 2020-02-25 | Minor updates | Seenan Bunni |
| 1.02 | 2020-12-02 | Annual review | Razvan Anghelidi |
| 1.03 | 2021-01-20 | Wording changed to reflect position and access rights change, and to cover all associates instead of just employees | Razvan Anghelidi |
| 1.04 | 2021-12-12 | Annual review | Hadeel Alzuhairi |