Employment Screening Policy

Conforms to ISO 27001:2013

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1. Introduction

1.1 Purpose

Our employee background check policy refers to our guidelines for investigating our job candidates' backgrounds as part of our hiring process.

Background checks help us:

- · Get insight into candidates' background
- Ensure we hire reliable employees
- Verify candidates' information for truthfulness and accuracy

1.2 Scope

This employee background check policy applies to candidates who go through our company's hiring process. It may also apply to internal candidates who are being considered for a promotion or transfer.

1.3 The Issue Status

The issue status is indicated by the version number in the footer of this document. It identifies the issue status of this document.

When any part of this document is amended, a record is made in the **Amendment Log** shown below. The Manual can be fully revised and re-issued at the discretion of the Management Team. Please note that this Manual is only valid on the day of printing.

Issue	Amendment	Date	Initials	Authorized
1	Initial Issue	02/01/2022		ISMS Manager
2	Change in BGV process	03/24/2022		ISMS Manager

2. Employment Screening



2.1 Policy Elements

Background checks may include:

- Criminal records (All employees)
- Credit reports excluded
- Drug testing excluded
- Verification reports (for example, identity, previous employment, educational credentials etc, done internally by our own team)
- Reference checks (Done on a needy basis by our internal team

All candidates aren't required to pass every type of background check we offer before our company hires them. Each position has its own requirements. For example, driving records may be relevant to field reliable salespeople and taxi drivers, but not to hire office managers. The basic background screening includes verification reports and reference checks.

When an individual is hired for a specific information security role, TrusTrace will make sure the candidate:

- Has the necessary competence to perform the security role
- Can be trusted to take on the role, especially if the role is critical for the organization.

Where a job, either on initial appointment or on promotion involves the person having access to information processing facilities, and, if these are handling confidential information. For example, financial information or highly confidential information, the organization should also consider furthermore detailed verifications.

A screening process will also be ensured for contractors. In these cases, the agreement between the organization and the contractor will specify responsibilities for conducting the screening and the notification procedures that need to be followed if screening has not been completed or if the results give cause for doubt or concern.

Information on all candidates being considered for positions within the organization should be collected and handled in accordance with any appropriate legislation existing in the relevant jurisdiction. Depending on applicable legislation, the candidates will be informed beforehand about the screening activities.

2.2 Employee Background Check

In most cases, background checks are initiated after the candidate is onboarded. However, in some cases, TrusTrace will choose to conduct a background check after an offer is made and before the candidate is onboarded.

Background checks are meant to reinforce a hiring decision and ensure candidates who have been selected for a job are suitable.

2.3 Background Checks for Non-Employees/Graduates/Undergraduates

Currently, TrusTrace does not require to conduct criminal background, credit reporting, drug testing checks for undergraduate and graduate student workers, affiliates, associates, or volunteers, unless such individuals perform a Security or Safety-Sensitive job.

Only verification and reference checks are done for students by engaging the third-party partners



or directly contacting the university/college.

Local laws may prohibit or restrict certain types of background checks. We will comply with legal guidelines at all times.

2.4 Process

TrusTrace may engage a third-party partner to conduct background screening checks, including reference checks as and when required.

All positions requiring a level of employee screening checks shall be identified in the job posting for the position, along with the specific checks which will be required. Applicants will be informed during the post/pre-employment process that selection is subject to completion of background screening with results acceptable to the TrusTrace, and which check(s) would apply.

The information obtained through employee screening checks will be maintained in a separate file in **Human Resources**. Hard copy results will be destroyed three years following the date of hire.

To mitigate the risk of delay in the Background Verification process either by third party or by new joiners, all the necessary verification forms & documents along with acknowledgement will be collected as soon the offer is processed.