

Screening of management at Radboud University *pilot* (June 2020)

To safeguard the university's integral security, the Executive Board has decided to implement a pilot to screen new and existing staff members for higher management positions. Integrity is an important value in a safe working environment. It calls for honesty, sincerity and trustworthiness in personal and business relations, in scientific education and research, and in governance and management. Integrity pertains to threats that arise from a failure to act professionally, reliably and carefully with due observance of the responsibilities associated with the position, with the applicable laws and regulations, and with the current standards in the university sector.

Administrators, supervisors, professors and management members have a particular responsibility in this. One way this responsibility is expressed is through exemplary behaviour and initiatory and evaluative activities.

For this reason it was decided to apply the methods described in this memo in the form of a pilot, particularly to higher management positions, for a period of two years, starting as soon as possible after agreements are made with external parties about the screening. Higher management positions have an above-average risk of integrity violations and place higher integrity demands on the employee. The relevant positions are listed in the table on page 4.

Integrity and screening

Integrity violations can occur in any organisation and may include the public release of confidential information, a driver declaring false costs, a conflict of interest, theft, the use of hazardous substances, etc. The risk of unacceptable behaviours like these can be mitigated by screening new employees. The extensiveness of the screening depends on the vulnerability of the position. Current employees who are entering new positions that are more susceptible to fraud or conflict of interest may also be screened. In all cases, it is important that screening becomes the necessary means by which to mitigate the risks of unethical behaviour. Moreover, current and future employees must be informed that a screening may take place.

Screening is not a standalone process, but is linked to other applicable policies and integrity policies, such as social safety and the leadership vision.

The screening is an essential part of the risk mitigation process, but must be proportional. It is not necessary to conduct an extensive screening of all future employees.

Risks to academic integrity can be limited by developing and implementing an efficient recruitment and selection process for academic staff and by applying various codes of conduct, such as the Netherlands Code of Conduct for Scientific Practice. Screening of academic staff can therefore be limited to positions with clear vulnerabilities, such as those with considerable authority, budget and access to confidential and vital information.

Screening at RU must also extend to support staff (including the Executive Board), and particularly to positions that involve considerable power, positions that deal with money and goods and positions with access to sensitive information, hazardous substances, or vital infrastructure (e.g. ICT).

What are the risks?

The screening authority of the Ministry of Security and Justice (Justis) has created a table to help identify potential integrity risks per job/job category. Radboud University used this table to develop the following overview, which provides insight into potential risk areas and their associated risks. The risk areas were chosen in such a way that together they form authoritative work areas in which authority may be exerted over people, goods, hazardous substances, money, or information.

Risk area	Risks
Information (access to systems or information)	Sharing, selling, changing, manipulating, misusing information
Money (Money handling, declarations, budgeting)	Fraud, theft, bribery, conflict of interest
Goods and services (Purchase of goods or services, tendering, possession and use of hazardous substances/objects which, through improper use, pose a risk to humans or animals)	Embezzlement, theft, bribery, conflict of interest, disruption of business processes, safety of humans or animals
Financial transactions (Independently maintaining contact with external suppliers and the authority to release tenders, decide on offers, conduct negotiations and conclude business contracts)	Bribery, embezzlement, blackmail, conflict of interest
Organisational management (The power to influence people or decisions based on status, knowledge or ability)	Abuse of power and authority
Vulnerable individuals (Protecting vulnerable individuals, such as minors and the ill/dependent)	Abuse of power and position of trust; sexual and violent crimes
Independent actions (Undertaking vulnerable actions alone or independently or making decisions without external intervention)	Bribery, abuse of power, abuse of authority, fraud, conflict of interest

Screening for ‘vulnerable positions’

Based on the indicated risk areas and the associated risks, several positions at Radboud University are considered ‘vulnerable’. These positions have an above-average risk of integrity violations and place higher integrity demands on the integrity of employees. As a result, these positions are subject to a basic screening and a more extensive screening. Radboud University will mention this screening process in the vacancy text. The potential elements of this screening have been listed below. The supervisor or the HR department will hire an external party with knowledge of the screening process and the relevant legislation, among others through partners with access to the necessary information and with a digital environment in which to launch and monitor the screening process. The external party will report to the supervisor.

Not all of the risk areas included in the table will be assessed for all vulnerable positions. The presence of a single risk area in a position is enough to warrant a more extensive screening. Not all vulnerable positions are screened for the same elements. The breach of privacy for the relevant individual must be proportionate to the reason for the screening. In consultation with the external party, several screening profiles will be developed, from which the supervisor can choose depending on the position.

The more extensive screening will apply to contracted employees as well as interim workers, freelancers, temporary workers, and interns in positions with the aforementioned risk areas.

If these risk areas occur as part of the job, the following screening will take place. Basic

screening:

- Identity check
- Qualifications (highest/most relevant degree obtained)
- CV and references
- Online profile

AND

Screening for one or more of the following:

- Credit rating/payment behaviour, registered companies, convictions, guardianship registry
- Work experience (last five years)
- Online certificate of good conduct (VOG) or international equivalent
- CV in European format
- Personal integrity statement (regarding past convictions, financial misconduct, ancillary activities, etc.)

For specific positions or circumstances, the screening may be expanded to include:

- Statement of independence (freelancers), registration with chamber of commerce
- International criminal records or sanctions lists
- Additional documentation
- Sector-specific registries, such as BIG, KNMG

Note: Radboud University uses the Netherlands Association of Personnel Policy job application code (NVP), which states that both the job applicant and the organisation must be aware that available information from open sources (e.g. the Internet and third-party information) is not always reliable. The information obtained and the source will be discussed with the applicant and the organisation will be transparent about all information obtained.

The following table shows which positions must be screened for both internal and external hires.

Vulnerable positions	
Financial Affairs	• Director of Finance & Control • Head of IAD • Heads of Control • Controllers • Head of Salary Administration • Head and deputy heads of Financial Administration
Campus Services	• Head of Purchasing
Management and Support	• Executive Board • Executive Board secretary • President and vice president of Business Operations • Director of the central organisational unit (including the general director of Radboud Services) • Dean and vice dean • Directors of education and research
ICT	• Director of Information Services • Security manager
Property manager	• Director and deputy director of UVB

Screening external candidates

- The following sentence is included in the recruitment profile: “A screening is part of the hiring procedure.”
- The screening will take place before the terms of employment meeting during the selection procedure.
- The candidate must consent to this screening in advance by signing a consent form.
- The terms of employment meeting can take place is a provisional ‘report’ is submitted (excluding the certificate of good conduct if necessary, as this may take longer to obtain). Decisions will be made following the results of the full screening, including the certificate of good conduct.

Situations upon termination of employment

- Employees who already hold a vulnerable position at the start of this pilot will be screened if a screening has not yet been carried out or if it was carried out more than two years ago.
- Internal references must be requested for internal candidates. The screening must be carried out as per the table below for candidates entering a new vulnerable position.
- Changes to the situation of employees in vulnerable positions (e.g. attachment of earnings) does not warrant a screening. With the attachment of earnings, the personnel officer and the personnel advisor will be informed by Salary Administration. HR will then assess whether the employee’s situation poses a risk to their functioning. When in doubt, HR can consult the employee’s manager.

What if the screening report yields a negative recommendation?

- If a certificate of good conduct cannot be provided, the relevant candidate will not be offered an employment contract for the position. This also applies to internal

candidates applying for a vulnerable position.

- If the negative recommendation or issues in the screening report involve something other than a certificate of good conduct¹, the manager will consult their supervisor and the HR advisor to determine whether the position can be granted (or maintained, as the screening is repeated every two years)². The considerations made during the decision-making process will be included in the personnel file. If the candidate is not a university employee and is rejected, the screening information will be destroyed along with all other application information.

Screening process and responsibility

Role of supervisor

The individual authorised to sign the employment contract on behalf of the university is also responsible for the screening and the associated costs. For the screening of 'vulnerable positions', the supervisor or the HR department will contact the external party³. The external party will report to the manager.

Role of HR

In addition to the agreements made within the unit (service/faculty) about the division of roles between the manager and HR in the screening process, HR will serve as the process monitor during the screening process. HR is responsible for the following:

- Periodically monitoring the vulnerable positions.
- Advising on and monitoring the screening process, the tools used, and the associated conditions.
- Identifying wage attachments (p. 5 under 'Status after employment')

Evaluation

An evaluation of the management screening pilot at Radboud University will be presented to the Works Council after two years.

¹ A screening report may include negative points, but these will not always pose a risk to integrity or job performance. No employment contract can be granted without a certificate of good conduct, but licentious behaviour on social media (particularly in a candidate's younger years) will not factor into the decision-making process.

² If a certificate of good conduct is not issued to a current employee in a vulnerable position during this pilot or if issues are raised during the screening, a custom process will be developed and applied in consultation with the supervisor, their manager, and the HR advisor.

³ The supervisor or HR will share the candidate's contact details with the external party for the position and screening profile to be carried out. The external party will then take over the process and approach the candidate. The external party will request information, check the information received, and support the candidate for issues that they must carry out independently. This also applies to candidates applying from abroad. The external party will report to the supervisor.