



# Personnel Security Policy

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Personnel Security Policy

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# Personnel Security Policy

## Purpose

The purpose of the Personnel Screening Policy is to ensure adequate checks are established to determine and or confirm, within appropriate legal and professional limits, the qualifications and suitability of a job candidate for the particular position for which the candidate is being considered.

## Scope

The Housing Authority of Fort Mill Personnel Security Policy applies to all Housing Authority of Fort Mill applicants and employees; full-time and part-time and the users responsible for personnel management.

## Policy

### General

- For all roles within the Housing Authority of Fort Mill, the hiring process should ensure the candidate has the necessary competence to perform the role and can be trusted to take on the role, especially for roles related to the use, management or protection of information security.
- Information security responsibilities must be communicated to employees as part of the hiring process.
- All employees are required to sign a Confidentiality/Non-Disclosure Agreement before being granted access to any information resource. The agreement includes:
  - The information to be protected,
  - The duration of the agreement, including cases where confidentiality may need to be maintained indefinitely,
  - Required actions when agreement is terminated,
  - Responsibilities of signatories to avoid unauthorized information disclosure,
  - Ownership of information, trade secrets and intellectual property, and
  - Terms for information to be returned or destroyed at agreement termination.
- The Housing Authority of Fort Mill will provide all employees an anonymous process for reporting violations of information security policies or procedures.

### Background Checks

- Background checks shall be required prior to employing Housing Authority of Fort Mill employees, regardless of whether or not a competitive recruitment process is used.
- Background checks may be required for employees who change positions in the company, obtaining more sensitive duties, as determined by the Executive Director.
- Background checks may be required for employees at any time after the employment start date, at the discretion of the Executive Director.
- Written notification of the requirement to successfully pass a background check will be given during advertisement and/or at time of application.

- Background checks may only be conducted by the Executive Director or possible employee direct supervisor, and only after receiving a completed and signed Authorization for Pre-Employment Background Check form.
- Pre-employment background checks will include, at a minimum:
  - a multi-state criminal background check including felonies and misdemeanors,
  - a social security trace,
  - a National Sexual Offender Registry check,
  - confirmation of academic and professional qualifications.
- Background checks may also include, at the discretion of the Executive Director:
  - a credit check (conducted in compliance with the Fair Credit Reporting Act),
  - driver history check, and/or
  - credentials verification.
- Before employment begins, a background check must be completed. Any offers of employment made before a background check has been completed must be made expressly conditional upon successful completion of the background check.
- Conditional offers will be withdrawn if the results of the background check are deemed to disqualify the applicant for the position.
- Results from a Background Check will be considered in the following manner:
  - If the background check reveals criminal records or other serious misconduct (other than minor traffic violations), the Executive Director may consult with legal counsel and/or executive management.
  - The Executive Director, legal counsel, and/or executive management will make an initial determination as to whether the background check results would disqualify the candidate for the position.
- Consideration will include, but not be limited to, the following factors:
  - Number of offenses or misconduct and the circumstances of each;
  - length of time between the offense or misconduct and the application for employment;
  - other employment history;
  - evidence of applicant's rehabilitation efforts;
  - severity of the offense or misconduct; and
  - relevance of the offense or misconduct to responsibilities of the position
- All determinations made by the Executive Director, legal counsel, and/or executive management must be documented.
- To the extent required by the Fair Credit Reporting Act (FCRA), applicants will be informed, in writing, of adverse information discovered in the background check and given an opportunity to respond. Upon conclusion of the review, written notice will be sent to the candidate regarding the Housing Authority of Fort Mill's decision of eligibility for the position.
- All results of background check will remain confidential, will be maintained by the Executive Director and will be disclosed only to authorized employees who have a need to know in the performance of their job duties. If a paid service is used to acquire the background check their rules of destruction are applied.

- Failure to disclose criminal convictions requested during the application process may result in disqualification for employment or termination of employment.
- Disqualification of a candidate based on information discovered in a background check is not subject to grievance or appeal by the candidate.
- The Housing Authority of Fort Mill will be responsible for the costs associated with background checks for Housing Authority of Fort Mill employees/candidates. The investigation will be conducted by a qualified vendor approved by the Housing Authority of Fort Mill to conduct such investigations.
- Contractors with access to the Housing Authority of Fort Mill Confidential information must have a process in place for conducting background checks on applicable staff. An agreement must be put in place specifying the responsibilities for conducting background checks if a procedure is not currently being followed or in question.

## References

- ISO 27002: 7.1.1, 7.1.2, , 7.2.3, 7.3.1
- NIST CSF: PR.IP-11

## Waivers

A waiver from a policy provision may be sought, and subsequently granted due to certain unforeseeable, unusual and/or exceptional circumstances. Policy provision waiver request, approval, and documentation procedures must be drafted and approved as part of this policy.

## Enforcement

Any user found to have violated this policy may be subject to disciplinary action, up to and including termination of employment.

Any vendor, consultant, or contractor found to have violated this policy may be subject to sanctions up to and including removal of access rights and termination of contract(s).

## Version History

Version	Date	Author	Reason/Comments
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