

Getting Greater Global Results

+ TOP 10 LESSONS LEARNED FROM COMPANIES SCREENING INTERNATIONALLY

Chapters

Global employment screening is the right thing to do.

The basics every employer should know: what, when and why.

Lessons learned: experience is your best guide.



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First Advantage

A Symphony Technology Group Company



GLOBAL EMPLOYMENT SCREENING IS THE RIGHT THING TO DO

Here's how to make it easier.

If you're reading this ebook, you get it. Organizations like yours know that background screening is becoming a service without borders. You simply must screen the people who work for your organization, no matter where they're from or where they work, or you risk the integrity and worldwide credibility of your company.

Global screening can be very different from standard background screening. Availability of information, and the time and requirements to conduct the searches are different than what is standard. That complexity is what drove the development of this eBook.



To help you better understand the basics of global screening as well as its complexities, we're pulling back the curtain and sharing our global expertise in a brief series of lessons learned, along with tips, insights and recommendations designed to strengthen your knowledge base and potentially streamline and advance your overall global screening program.

3 Ways Global Screening is Different than Local Screening

- Information, such as criminal records, credential verifications, and databases may not be as available.
- Special forms, procedures, and consent language may be needed, especially for data privacy or differing local laws.
- Cost and turnaround time can be much higher than domestic screenings.

Despite these differences, there are screening firms that specialize in overcoming obstacles. Keep reading.





THE BASICS EVERY EMPLOYER SHOULD KNOW: WHAT, WHEN AND WHY

1. What exactly is a global background check?

For starters, it's not a criminal record search. A global background check is a collection of screening components which may or may not include a criminal record check, employment and education verifications, identity verifications and others. Sometimes, it's as simple as a reference check.

It involves the verification of supplied information by an applicant who has given express written consent. A typical global screen may consist of contacting the employers and schools supplied by the applicant and conducting a reasonable criminal check to the extent possible in that country and appropriate for that position. If more information is needed, the applicant can be asked to supply it.



The components included in a global background check should vary based on the position being filled, regional and country specific laws and regulations, cultural norms, data availability, political climate and other conditions.

2. When are global checks performed?

Employers perform global background checks when they are:

- Hiring an applicant who has spent a relevant time period outside of the country in which they are seeking a position. Many employers touch global screening when they add background searches from outside of the country to their screening request.
- Hiring workers in another country to work in that country—but outside of the original country of that company’s headquarters.

3. Why do it?

All over the world, employers rely on background screening to verify the information provided in the job application. This screening may be conducted by the company’s own staff, or, increasingly by third party companies that specialize in background screening. Unfortunately incidents of job history and education history falsification are on the rise worldwide. Validating

Top 20 Requested Countries for Background Checks¹ [in alphabetical order]

- Australia
- Brazil
- Canada
- Chile
- China
- France
- Germany
- India
- Ireland
- Israel
- Japan
- Malaysia
- Mexico
- Nigeria
- Pakistan
- Philippines
- Russia
- Singapore
- South Africa
- United Kingdom (U.K.).

¹ Society for Human Resource Managers 2012 International Background Verifications



the application information helps employers obtain and retain quality and competent employees.

Employers in many countries, including Australia, have a legal duty to exercise due diligence in hiring. In the US, an employer can be sued for negligence if it hires someone who it knew, or in the exercise of reasonable care should have known, was dangerous, unfit or unqualified for the particular job and it was foreseeable that someone could be harmed. That same standard of care applies to employers who hire individuals who live or who have spent time outside of the U.S. and also for employers making hiring decisions abroad.

Despite many other flavors of “why” employers perform global screening, things like industry compliance, ensuring competency, protecting against physical, legal and financial risk, it often boils down to one salient point: protecting your global brand reputation. And studies by the Aberdeen group have shown companies who screen usually obtain quality candidates, see a decrease in turnover with a higher first-year retention, a decrease in the time to fill the position, and the candidates are considered “top ranked.”²

² Aberdeen Group Research Brief September 2010





LESSONS LEARNED: **EXPERIENCE** IS YOUR BEST GUIDE

As a world-leading global screening provider, we at First Advantage have seen, experienced and helped organizations learn how to strengthen their global screening programs. Apart from working with countless organizations to establish successful international employment screening programs, we now have 26 global offices staffed with employees who provide us with unmatched “feet on the street” coverage in more locations worldwide than any other screening provider. In this section, you can tap into the deep expertise we’ve acquired over the years and apply these proven insights to initiate or advance your own global screening program.



Lesson 1. Screen globally to manage media exposure.

Remember this: no matter how senior or junior the position or where the position is located, always screen your employees. All it takes is one unverified background, and your organization is fodder for the next media feeding frenzy.

Industry estimates for identifying discrepancies between resumes and verified experience is high. It happens everywhere from the corporate world to government agencies. When the discrepancy is due to deliberate falsification by the candidate, it is not limited to low level hires. C-suite executives from top software firms in the [U.S.](#) and [China](#) have lied about their education background, as did a former [deputy CIO](#) of the U.S. Department of Homeland Security, who “purchased” her Ph.D. from a diploma mill. In all cases, the untruths were discovered after the individuals were hired and had influenced their organizations’ employees, goals and objectives.

Employee-related oversight and fraud, and the ensuing media fallout, has always been bad for a brand. In today’s instantaneous, social media news cycle, damaging news travels the world in seconds, and even worse, it continues to thrive and live on in online discussions, videos and blogs. Events related to your brand become a topic of debate in the 24/7 news cycle and remain searchable on the Internet for years, or decades, after they occur.

10% - 12%

Estimated percentage of fraudulent applications due to false educational qualifications or experience submitted within India’s IT industry, which boasts an estimated manpower of 2.5 million.

-Source: First Advantage



In a matter of days, just one negative event can unravel the sizable, long-term investment most successful organizations devote toward brand development—easily as much as 50 percent of a marketing budget. Coupled with that, is the added, unplanned cost to repair the damage, which can soar into the tens or hundreds of thousands of dollars. Not only can this affect your sales and profitability, but your future potential to attract future talent and secure existing talent.



Key Takeaway

A simple background check to verify the information supplied by your global candidates costs far less than the media backlash for not doing it. Don't skip it.

Lesson 2. Consent matters, no matter the country.

In the U.S., there are a myriad of state and federal laws beginning with the Fair Credit Reporting Act (FCRA), all designed to protect personal consumer information from being misused in hiring and financial decisions, and from being shared, used or stored in ways not approved a candidate. However, with proper written consent from applicants, in accordance with these laws, you can get the information you need to conduct a background check.

Global Consents

The four primary worldwide privacy principles listed below serve as an introduction to the requirements which should be considered when creating a consent for global pre employment background checks and when processing these background checks.

- OECD (Organization for Economic Cooperation and Development) Privacy Principles found in the OECD Guidelines on the Protection of Privacy and Transborder Flows of Personal Data, promoting privacy protection across the world (<http://www.oecd.org/sti/ieconomy/oecd-guidelinesonthe protectionof-privacyandtransborderflowsofpersonaldata.htm>)
- EU Directive, covering the European Union
- APEC (Asia Pacific Economic Cooperation) Privacy Framework
- PIPEDA (Personal Information Protection and Electronic Documents Act), covering the private sector in Canada when not covered by substantially similar provincial legislation and certain transborder transactions.



Similarly, other countries and regions are equally passionate about this cause, if not more so, and enforce their own consumer protection and data privacy laws.

This means that consent forms and requirements vary by country, and before you start a background check, you must understand what exact information is required in a consent for employment background screening in the specific jurisdiction. Otherwise, you'll be forced to backtrack with a candidate, after initiating a background check, in order to secure the appropriate consents. It's an unnecessary step that delays the hiring process and could cause you to lose a top candidate to a competing employer.

Here are some other caveats around consents.

- Different countries have different requirements for consent language. If you operate in multiple countries, one size may not fit all. And a consent that is appropriate for US candidates will rarely be appropriate for candidates residing outside of the US.
- Some countries require specific language to be included in the notice and consent if personal information is to be transferred out of the home country. If your candidate is in one country and your background screening takes place in another country, make sure you follow these requirements. And don't forget even when doing your own verifications, you may be transferring personal information across a country border, for example when you are checking for foreign school or employment history.
- Ensure your candidate consent and disclosure forms are translated into the appropriate languages, as this is a regulatory requirement in some countries.

Key Takeaway

Accelerate the screening process while complying with global privacy regulations by doing your research and knowing what consents and processes are required in a country before initiating a background check.



Lesson 3. Even data needs a passport.

Global background checks involve the collection and transmission of personal information and sensitive data across international borders. As a result, the background checks are subject to data protection laws of many countries.

Many countries have privacy and data security regulations and their regional privacy regulations, such as the EU Directive, can serve as a high level overview of the requirements of that region. The OECD Privacy Principles are a good foundation to understanding privacy regulations in general.

Other countries have unclear laws or no regulations at all. For the most part, countries typically fall into one of several categories:

- Strong data privacy and security regulations include members of the European Union (EU), Argentina, Brazil, South Africa, Australia, South Korea, and Canada. You should manage background-screening programs with strict regulations in these jurisdictions by following in-country regulations. In some of these countries, such as the UK and Canada, guidance is available from government resources regarding vetting and screening.
- Moderate data privacy and security regulations or no country-wide regulations. These countries may be developing privacy regulations or may rely on

Quick Links

The OECD Guidelines on the Protection of Privacy and Transborder Flows of Personal Data are the foundation of many privacy guidelines and regulations. Take a peek at the OECD Privacy Principles (hyperlinked below) for a better understanding general privacy requirements worldwide.

[OECD Privacy Principles](#)
[OECD Guidelines on the Protection of Privacy and Transborder Flows of Personal Data](#)



constitutional statements to govern the rights of a candidate with respect to screening. There may be a lack of clarity with regards to background screening. Other countries may not have country wide privacy regulations but have regulations governing certain sectors, such as information technology, which can encompass the background screening process. There may be sectoral requirements or guidance available as there are in China and India. And there may also be very specific requirements to conduct certain screens for certain positions.

- No privacy regulations. There are still some countries, generally the less developed countries or those without a strong EU influence, that have no privacy regulations or constitutional guarantees for privacy. But these countries are becoming fewer and fewer. It's best not to assume that a country lacks all privacy protections.

You should be aware of the cross border data transfer requirements in each jurisdiction. The act of sending emails with personal data, such as spreadsheets of individuals to be background screened, may easily fall within the country's data transfer restrictions if they contain personally identifiable information and may require additional handling such as obtaining consents from the data subjects and encrypting the data prior to the transfer.

Key Takeaway

To cover your bases, follow the basic principles of the OECD or the more conservative regulations like the EU Data Protection Directive. Include candidate consent, single purpose of data, security of data transfer and destruction of data process. In addition, work with a sophisticated screening provider that supports the secure handling of sensitive information by offering value-added capabilities, such as automatically purging sensitive information when it's no longer needed.



Lesson 4. Outsourcing verifications makes sense.

Outsourcing your global verifications may not be top of mind, especially if hiring is unstable and budgets are tight. Yet, that's precisely when it makes the most sense, as your ability to efficiently find and vet the most competent, high-quality employees from around the globe is more important than ever.

For starters, you immediately acquire the global reach of a qualified screening provider, without respect to time zones, language variances, and cultural differences, which can be a challenge for internal resources.

More importantly, you also acquire the screening provider's global expertise, which can save you time in more ways than one. First, you can stop chasing after consent forms by working with a provider that can identify all required documentation and inquiry information needed before performing the verification. Likewise, it's much more efficient to use a team of professional verifiers who are strictly dedicated to the task, as opposed to internal resources who are also juggling other responsibilities. Local teams with global expertise mean you won't run afoul of local screening norms and can secure reliable, accurate and extensive information from around the world for each of your hires.

Outsourcing also fosters a consistent process with more reliable results. For instance, one person on your internal team might make three attempts to contact a previous

SHRM Weighs In

According to the Society for Human Resource Management, here are two good reasons to outsource certain subprocesses within human resources, including background checks and verifications.

1. The function is inherently complex or carries with it legal compliance risks that are disproportionate to the volume of activity.
2. The function can be provided on a cost-effective basis by leveraging relatively low volumes within your organization in combination with the much greater scale of activity performed by the vendor across all of its clients.

http://www.shrm.org/hrdisciplines/pages/cms_019456.aspx



employer, while another only tries once. Experienced screening providers follow a strict, pre-approved process, conduct the verifications in a consistent manner from person to person, and document the attempts and results. Likewise, they use approved scripts to ensure you get the most in-depth and consistent results. Consistency of a global program is difficult to achieve internally, but easy for a well established provider with global reach and technology.

Key Takeaway

Unless your core competency is performing global verifications, which it likely isn't, consider outsourcing this complex and time-consuming task. It will save you time and provide you with faster, more consistent and reliable results. Also, when evaluating screening providers, look for firms that offer "oneworld" processing, meaning regardless of where the verification is performed—from Afghanistan to Zimbabwe—the same process is used, keeping in mind local norms.

Lesson 5. Does "can" always equal "should?"

Does the fact that you have the ability to acquire certain data mean that it should be used for employment purposes? Not necessarily.

For example, you could easily hire an attorney to visit the courts in Germany to obtain criminal record information about a job candidate on your behalf. However, this is generally not considered an allowable process for employment purposes in Germany.

Here's another scenario. Say you have a candidate who lived in the U.S., but now lives in Mexico, and is applying for a highly supervised job with no access to cash or sensitive information. While you can perform a U.S. criminal record check, should you? For that position, in that country?

The point is, extenuating circumstances matter, and not considering them could cause you to spend time and money on unnecessary components of a background check, or put your



organization in violation of local laws, regulations and guidelines.

Before initiating a global background check, you should always stop to consider the situation and determine:

- What screening components make the most sense based on the position being filled
- What data restrictions or limitations and employment screening guidelines are in effect within the country being searched

Key Takeaway

To cover your bases, follow the basic principles of the OECD or the more conservative regulations like the EU Data Protection Directive. Include candidate consent, single purpose of data, security of data transfer and destruction of data process. In addition, work with a sophisticated screening provider that supports the secure handling of sensitive information by offering value-added capabilities, such as automatically purging sensitive information when it's no longer needed.

Lesson 6. Know your options.

In the U.S., they have extensive access to public and private databases to aid in key screening tasks such as criminal record checks and employment verifications.

See the Differences

Below are examples of differing country specific guidelines on employment screening.

Australia

Employment screening handbook (HB323-2007)
Employment screening (AS 4811-2006)

Canada

Canadian Human Rights Commission Guide to Screening

Ireland

Ireland (Republic of) Data Protection Commissioner Employee Vetting Guidance

United Kingdom

Information Commissioner's Office (ICO) Employment Practices Guides
CPNI (Centre for the Protection of National Infrastructure) Pre-Employment Screening



However, outside the U.S., most other countries don't have publicly searchable databases for background checking, if they have them at all.

Yet, there are some notable exceptions and you should understand and be aware of these valuable resources such as the National Skills Registry and Global Terror and Sanctions Lists.

- The National Skills Registry (NSR). This a national database of registered and verified knowledge workers in the IT industry. Data fields include permanent fact sheet of information on the professional along with photographs and appropriate background checks (where undertaken). Biometrics are also included to ensure unique identification.
- Global Terror and Sanctions Lists: Government published lists of persons designated under its various sanctions programs as known threats.

Key Takeaway

Although the availability and accessibility of databases for the purposes of employment-related background checks is extremely limited outside the U.S., resources do exist and you should use them. To further accelerate and streamline the usage of these databases, work with a screening provider that has approved access to the database resource, or is an authorized reseller.

Global Screening

Global Screening has doubled for First Advantage in the past 5 years growing from 3+million in 2009 to 7.6 million in 2012.

Nearly a third of the background checks we perform today contain requests for information outside of the United States.



Lesson 7. Benchmark your performance.

Global employment screening is a dynamic, ever-changing process due in part to evolving technologies and expanding regulations and laws around consumer protection and data privacy. As a result your program could experience dramatic shifts in performance due to circumstances beyond the control of your candidates, your organization or your screening provider.

Because of these changes, you need a mechanism for evaluating your program performance and driving improvements that keep that performance aligned with market standards.

Global Screening Trend Reports are available from sophisticated screening providers to help organizations benchmark their program against that of other employers. By drawing on a subset of customer background checks performed within a specific time frame, providers can show the most popular component types (criminal record search, employment verification, etc.), and which industries within a country are performing more background checks than others. Likewise, they can reveal average background check discrepancy rates by region, country and component, and much more.

Your screening provider should provide you with access to analytics about your global screening activity, which you can then compare to the broader market trend reports.

Request a Report

Ask your provider for analytics to drive program efficiency:

- Turnaround time analysis
- Order volume
- Typical reasons for missing information delays
- Top reasons for candidate disqualification



Question areas where your performance has dropped compared to the market, and work with your provider to resolve the issue through updated technology, products or other strategies. Likewise, regrouping with your screening provider to review historical activity provides the big-picture insight you need to make proactive program improvements based on your organization's key goals and objectives.

Key Takeaway

Work with your legal counsel early and often when performing international background checks. In the end, it is the employer who will be held accountable for violation of local and regional rules, regulations, guidelines and laws. However, your vendor should be able to help you prepare or forewarn you of concerns to keep you out of troubled territory. Your vendor should be your guide with your in-house legal counsel to help you gain a solid understanding of international data privacy laws and their applicability to employment screening, as well as what is customary for background screening in a particular country.

Lesson 8. Don't play the legal blame game.

With global employment screening comes the onerous responsibility of knowing what's legal where. Depending on the scope and reach of your program, it can quickly seem like an all-consuming, if not impossible task.

Consider this: experienced global screening providers offer exactly that—experience. But, it's not legal advice. All quality screening providers will ultimately, and correctly, assign this responsibility to the customer. Possessing legal expertise around what personal information is accessible and permissible for employment screening purposes in 238 countries is simply outside the core competency of most screening providers. If it were included, global screening would become cost-prohibitive for most organizations.



It is strongly recommended that you consult with in-house or outside legal counsel when developing and managing a global screening program to determine what is legally allowable and sufficient for the jurisdictions in which you operate. Often, full and proper compliance involves a mix of local and regional regulations, which further emphasizes the need for professional legal guidance. Likewise, the regulations, guidelines and laws that affect global employment screening are quickly changing around the world, and a qualified legal resource can track these developments and help your organization stay up-to-date and compliant.

Key Takeaway

Work with your legal counsel early and often when performing international background checks. In the end, it is the employer who will be held accountable for violation of local and regional rules, regulations, guidelines and laws. However, your vendor should be able to help you prepare or forewarn you of concerns to keep you out of troubled territory. Your vendor should be your guide with your in-house legal counsel to help you gain a solid understanding of international data privacy laws and their applicability to employment screening, as well as what is customary for background screening in a particular country.

With mobility of workers across international borders, more employers need to consider global background checks

According to recent U.S. government statistics:

- 12.5 percent of the current population consists of immigrants.
- In 2009, more than 1.1 million persons became Legal Permanent Residents (LPRs) of the U.S.
- Many workers are from other countries, or in U.S. on work visas.
- Many U.S. citizens have spent time abroad.
- Many U.S. companies have offices/facilities abroad.



Lesson 9. Know where the buck stops.

When you order a global background check, does your provider take responsibility for the data it provides—completing due diligence on any vendors so that the supply chain meets or exceeds your standards?

As mentioned earlier, many countries have highly specific guidelines and rules on how personal information is handled, retrieved and transmitted across borders. Your screening vendor should manage this aspect of compliance within their vendor network, because ultimately your organization could be culpable should any misuse or mishandling of personal information occur within that supply chain.

The more internal resources or “feet on the street” a screening provider has throughout the world, the better it can manage quality control and compliance related to its global screening products. By understanding the scope of a provider’s supply chain versus its efforts to place actual employees and branch offices within other countries, you glean important insights about its experience level, cultural awareness and country specific compliance knowledge.



Key Takeaway

The more branch offices and employees a screening provider has across the world, the better they will understand local cultures, resources and regulations. In turn, it can offer you a stronger level of global screening oversight that minimizes your risk.

Coverage is in the Numbers

35,000 clients globally

55 million global background checks annually

26 Office in 12 Countries



Lesson 10. Get a “one-world” view.

As you juggle the many language differences, time zones and local restrictions, the last thing you need is the administrative nightmare of managing multiple logins, passwords and reports for separate websites.

Using advanced online technologies, some screening providers have created a smarter user interface that unifies all global screening activities under one login, one password.

Regardless of the country being searched, all activity can be initiated and managed using just one account that offers multi-lingual capabilities to support employees ordering reports from other countries and your candidates who may need to provide their data in a relevant local language.

In addition to being easier, a centralized view also supports strategic tasks such as program management and improvement. Since activity for multiple countries and regions is managed under one login, real-time metrics are accessible in a matter of clicks to show details around component types, countries, hit rates, verification discrepancies and more.

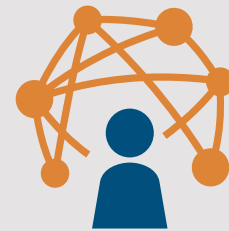
Key Takeaway

Do your research and don't settle for the status quo when it comes to global screening technology. Quality screening providers are investing millions to deliver innovative solutions that simplify the global screening process and give you easier, faster and more cost effective access to the information you need for stronger international hiring decisions.

Analytics Means Answers

One, multi-lingual product helps ensure a clear picture of overall program performance.

You can only get quick, comprehensive analytics, when one system monitors and reports out what is happening.



Moving forward

As more organizations expand their search for talent to a worldwide scale, it's more important than ever to screen your candidates with a global process. Efficiently and effectively screening international candidates gets quickly bogged down and complicated by things like time zones, language differences, consent forms, local and regional data privacy laws, cultural norms and more. Apart from increasing your familiarity with country specific employment screening guidelines, localized screening resources and cultures, your best bet for developing and managing a successful global screening program is to work with a qualified screening provider. The right provider can scale your program to meet your precise needs, while offering proactive guidance and automated, centralized solutions that help you quickly, cost-effectively and accurately screen and hire the best candidates from around the world.

**We can help. For more information,
contact First Advantage today:**

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Visit fadv.com.au

As the trusted partner of over 35,000 organizations worldwide, we at First Advantage provide easy-to-understand background screening results so you can confidently make decisions about prospective employees, vendors and renters. Not only does this safeguard your brand, but you also arrive at dramatically better background insights – insights you can rely on.

It's time to partner with First Advantage. Now in 26 locations, 12 countries and conducting over 55 million international background screens on 17.2 million applicants annually. **Trusted Knowledge.**

Exceptional People.



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