



Employment Checks Procedure

Procedure

Approver and Sponsor	Deputy Vice-Chancellor (Operations)
Owner	Chief People and Culture Officer
Secretary	Corporate Secretary
Policy	UP22/15 Talent Acquisition

1 Purpose

- 1.1 This Procedure —
- is to explain the University's requirements for obtaining and assessing **Employment Checks**.
- 1.2 This Procedure is to be read in conjunction with the following –
- Child Protection Policy;
 - Information Privacy Policy;
 - Talent Acquisition Policy;
 - Talent Acquisition Procedure;
 - Visa and Immigration Policy; and
 - Gender Based Violence Policy.

2 Roles and Responsibilities

Role	Responsibilities
Policy Owner	<ul style="list-style-type: none"> The designated department, reporting to the Policy Sponsor, who manages the day-to-day operations of the Policy. Responsible for the administration of the Policy including its communication, maintenance and review.
Policy Sponsor	Accountable for strategic oversight of the Policy, ensures its alignment with University strategy, and champions compliance with the Policy. The Sponsor is also the approving authority on subordinate documentation.
Policy Approver	The ultimate authority on each Policy.
Transformation Team	Provide support for the development, review, mapping and operationalisation of Procedures and subordinate documentation.
Policy Secretariat	<ul style="list-style-type: none"> The department responsible for the Policy Framework and its governance. The Academic Secretary is the Policy Secretary for Academic Policy. The Corporate Secretary is the Policy Secretary for Institutional and Administrative Policy. The Policy Secretariat is to be contacted via policy@uwa.edu.au.

3 Definitions

Term	Definition
Adverse Finding	A result from an employment check that may indicate a risk or concern relevant to the role.
Candidate	A person being considered for employment at the University, whether internal or external.
Casual Employee	An engagement with no ongoing commitment, paid hourly with a casual loading, typically used for short-term or irregular work.
Child Related Work	Work that usually involves (or is likely to involve) regular, direct contact with a child in connection with the work categories in the Working with Children legislation.

Term	Definition
Conditional Offer	An offer of employment made subject to the satisfactory completion of required employment checks.
Employment Checks	The process of verifying job-related information to confirm a person's suitability for a role and to ensure there are no barriers to their employment at the University.
Finance Check (FC)	A check that assesses a person's financial history, including bankruptcy or disqualification, where the role involves financial delegation or oversight.
Gender Based Violence	As defined in the Gender Based Violence Policy.
National Police Certificate (NPC) Policy	A check that verifies whether a person has a criminal history relevant to the role. An approved document registered on the UWA Policy Library that expresses requirements for behaviour and practice.
Pre-employment Medical	An assessment of a candidate's physical and functional capacity to perform the role, conducted by an external provider.
Procedure	An approved document that enables compliance with the implementation of Policy principles by providing step-by-step instructions on how to action specific parts of a Policy.
Qualifications and Licenses	The verification of academic credentials, professional qualifications or licenses required for the role.
Referee Report	A formal assessment provided by a previous employer or manager to validate a candidate's experience and suitability.
Sanctions Check	A screening process to ensure compliance with Australian sanctions laws, particularly for roles involving international collaboration or research.
Senior Position	A leadership or executive role that requires a full suite of employment checks due to its strategic and governance responsibilities.
Talent Acquisition	The process of attracting, selecting and appointing Talent.
Trusted Position	A role that involves access to sensitive information, systems or financial resources and requires additional checks such as NPC or FC.
Working with Children Check (WWCC)	A clearance required for roles involving child-related work, in accordance with the Child Protection Policy.
University	Is defined in Part 1 section 2 of the University of Western Australia Act 1911 (WA).

4 Scope

- 4.1 This procedure applies to all paid and unpaid roles which require appropriate screening to confirm suitability for appointment.

5 Process

- 5.1 All prospective or current employees (including casual employees) applying for a new position are required to undergo applicable Employment Checks and to provide all required applications and/or information to enable Employment Checks to be progressed.
- 5.2 Current employees may be required to provide new checks upon request by the University at any time during their employment.
- 5.3 The cost for all employment checks is borne by the University.
- 5.4 An Offer of Appointment may be made on the condition that the required employment checks and conditions of employment are satisfactorily completed (referred to as a **Conditional Offer**).
- 5.5 The **Talent Acquisition** team must complete any required employment checks before the successful **Candidate** commences, unless an exemption is provided by the Chief People and Culture Officer.

6 Required Employment Checks

6.1 Employment Checks Matrix

- (a) The requirement for all employees at the University is set out in the table below and described in more detail across sections 6.2 – 6.11.

	Reference Check	Identity Check	Working Rights Check	National Police Check	Finance Check	Qualifications and Licenses	GBV Declaration	Working with Children Check	Medical	Sanctions Check
Casual	x	x	x	x	x	x	x			
Non-paid		x	x			x	x			
Trusted Positions	x	x	x	x	x	x	x	Staff undertaking child related work	Positions with identified health requirements, otherwise as required per the position description	Based on DFAT sanction list and roles
Senior Positions	x	x	x	x	x	x				
All Other Positions	x	x	x			x				

Key:
x = Mandatory checks
x = Defined by Function/Area or as identified on Position Description

- (b) Where a Casual employee is working in a Trusted Position, Senior Position or Child Care position, the relevant National Police Check (NPC) / Finance / Working With Children Check (WWCC) / Qualifications and Licenses check must be completed.

6.2 Referee Reports

- (a) At least two Referee Reports must be obtained for external appointments to verify their claims for the position, of which one must be from their current or recent line manager.
- (b) One referee report must be obtained for current employees of the University.
- (c) A referee report is not required if an employee of the University is appointed into a position within the same department, school or unit of the University and is known to the Hiring Manager.
- (d) Referee Reports will be conducted using the endorsed Referee Report template. The Talent Acquisition team will provide them to the Selection Committee Chair for review.

6.3 Identity Verification

- (a) An identity verification check will be undertaken on all new employees to verify their identity.
- (b) Where the candidate identifies as Indigenous or Torres Strait Islander and is unable to provide 100 points of identification, the Talent Acquisition team will collaborate with the Hiring Manager to determine an alternative identity verification approach.
- (c) Identity Verification checks are not required for internal hires if completed as part of a previous recruitment process, unless the previous checks have expired.

6.4 Right to Work in Australia

- (a) Employment with the University requires the Employee or Prospective Employee to hold Australian citizenship, or to be a permanent resident of Australia or New Zealand, or to have a valid Visa that provides work rights.

- (b) A person holding a Business Visitor Visa (Subclass 600, 601, 651) will not be permitted to undertake any form of work, whether paid or unpaid, for the University. If work is required, a Temporary Skill Shortage (TSS) Visa (Subclass 482) or a Temporary Work (Short Stay Specialist) Visa (Subclass 400) may be appropriate. The type of activity/nature of the work and duration need to be considered when determining the correct Visa.
- (c) The University is not obligated to secure or fund Visas which are not employer sponsored.
- (d) Right to Work checks are not required for internal hires if completed as part of a previous recruitment process, provided:
 - (i) The previous check remains valid (for instance, the Visa has not changed, the original evidence has not expired or been superseded);
 - (ii) The new position is not materially different or requires specific employment checks (such as regulated duties, higher risk, or substantially different classification).

6.5 National Police Certificate (NPC)

- (a) An NPC will be a condition of employment or other engagement (including role extensions) at the University where —
 - (i) there is a legal requirement;
 - (ii) the position has financial delegation of more than \$50,000;
 - (iii) the position is a Finance, People and Culture, System Administrator or Cybersecurity position;
 - (iv) the position has access to Personal Information or Sensitive Information;
 - (v) the University specifies the position requires an NPC based on the inherent position requirements (i.e. security officers, cash handlers etc.);
 - (vi) the University specifies this in the Position Description.
- (b) An NPC is not required for internal hires if completed as part of a previous recruitment process, unless the previous check is older than 18 months.
- (c) The Hiring Manager and Talent Acquisition Team will assess the relevance of any criminal offence to the suitability for the position and make a recommendation to the Chief People and Culture Officer.

6.6 Working with Children Check (WWCC)

- (a) All employees undertaking **Child Related Work** are required to obtain a **Working with Children Check** in accordance with the Child Protection Policy prior to commencing work.
- (b) Employees must provide a new WWCC once their current WWCC has expired.
- (c) It is the employee's responsibility to ensure their WWCC remains current throughout their employment. The University will conduct periodic audits and require employees to provide updated WWCC details prior to expiry. Failure to renew a WWCC within the required timeframe **will** result in suspension or cessation of child-related duties until compliance is achieved.
- (d) Copies of employee WWCC will be stored on employee personnel files, and a record of the details will also be stored in the University's payroll system for reporting purposes. People and Culture will monitor expiring WWCC and will request updated details from the employee if they have not yet provided them. People and Culture will be responsible for maintaining accurate and up to date records of WWCC.

6.7 Finance Check (FC)

- (a) A **FC** will be a condition of employment or other engagement at the University where —
 - (i) the position has a financial delegation of more than \$50,000;
 - (ii) the position is a Senior Management contract;
 - (iii) the position is a finance position;
 - (iv) the University specifies this in the Position Description.
- (b) Employees must provide a new FC when commencing a new role.

6.8 Qualifications and Licences

- (a) Evidence of **Qualifications and Licences** as outlined in the position description are required to be provided by the candidate and may be validated by the Talent Acquisition Team in consultation with the Hiring Manager as required.
- (b) Qualifications and licenses checks are not required for internal hires if completed as part of a previous recruitment process.

6.9 Gender Based Violence (GBV) Declaration

- (a) All internal and prospective employees are required to complete a **GBV Declaration** in accordance with the GBV Policy prior to commencing work.
- (b) Where an employee makes a positive declaration:
 - (i) The matter will be escalated immediately to the GBV Assessment Panel for review.
 - (ii) The University will follow the investigation and risk assessment process outlined in the GBV Prevention and Response Policy before any employment can commence.
 - (iii) No offer of employment will be confirmed until the investigation is completed, and a determination is made regarding suitability for appointment.
- (c) If a positive declaration is confirmed, the University will implement appropriate risk mitigation measures to ensure a safe and respectful workplace, aligned with the GBV Prevention and Response Policy and relevant legislation.
- (d) Failure to complete the GBV Declaration will result in the recruitment process being paused until compliance is achieved.

6.10 Pre-employment Medical

- (a) A **Pre-Employment Medical** is an assessment undertaken by an external provider to assess a candidate's physical and overall capacity to work.
- (b) Pre-employment medicals are required when —
 - (i) a candidate has declared an active Workers' Compensation claim; or
 - (ii) the University specifies this in the Position Description.
- (c) There may be occasions when the preferred candidate for a position is currently receiving Workers' Compensation benefits and/or is being assisted by a rehabilitation agency.
- (d) In these circumstances, the University will consider the following options —
 - (i) external preferred candidates who have an active Workers' Compensation claim will be requested to provide a current medical certificate of capacity prior to commencing work;
 - (ii) arranging a 'work trial' period for 1-12 weeks prior to appointment, transfer or promotion during which the selected candidate performs the role however continues to be paid Workers' Compensation. The aim of this is to enable the University to ensure the candidate has capacity to work in the position before appointment or transfer.
 - (iii) having a workplace assessment/job analysis completed by a rehabilitation professional to determine whether there is a risk to the preferred candidate and whether this may be attenuated by provision of suitable equipment and furniture or reasonable alteration to existing work practices;
 - (iv) arranging provision of suitable furniture and equipment; and
 - (v) arranging short-term training to support the preferred candidate to conduct their duties.

6.11 Sanctions Check

- (a) Sanctions laws prohibit Australian academics providing sanctioned services, which includes providing technical training, advice or assistance to researchers and students if they are associated with a specific country, region or organisation regulated by sanctions, unless a permit is obtained from the Australian Sanctions Office (ASO). It also prohibits international collaboration with citizens or entities associated with sanctioned countries on certain topics that are restricted unless a permit from the ASO is obtained.
- (b) A **Sanctions Check** will be undertaken for any appointment where the appointee:
 - (i) resides, holds citizenship of, or has close connection with a country subject to Australian sanctions;
 - (ii) will undertake duties involving topics that are mostly, but not exclusively identified in the Defence and Strategic Goods List (DSGL). This may include export-controlled goods or technology, dual-use research, or access to assets that may benefit a designated person or entity; and/or
 - (iii) will engage in research collaborations or teaching/training services with a person, entity or country subject to sanctions.
- (c) This sanction check relates to sanctions regimes that are currently implemented under both Australian sanction laws. The [list of countries](#) covered by the sanctions regimes is updated regularly by The Department of Foreign Affairs and Trade (DFAT).

7 Employment Checks for Current Employees

- 7.1 Over the course of their employment, the University may require current employees to undergo additional Employment Checks. A reason for such checks may include, but is not limited to:
- (a) the employee is applying for a new position at the University with different Employment Check requirements to their current position;
 - (b) the University deeming that such Employment Checks are necessary to comply with its obligations under legislation; and/or
 - (c) a third party with whom the employee in question deals with during the course of their University duties requires an Employment Check to be carried out, and any associated clearance to be attained, prior to that employee performing any work with them.

8 Adverse Findings

- 8.1 If a check reveals an **Adverse Finding**, the Talent Acquisition team will prepare a summary of findings and assess relevance to the role.
- 8.2 The Talent Acquisition team may escalate this assessment to the Chief People and Culture Officer for advice or a final decision. Where appropriate, the Talent Acquisition team may make a recommendation on the appointment. If required, the Talent Acquisition team may invite the candidate to respond or provide additional information to support this assessment.

9 Employee Disclosure

- 9.1 Employees must immediately notify their Manager and / or People and Culture of any changes to their *disclosable criminal record* or any other circumstances that is legally required to be disclosed and relevant to their employment (e.g. criminal charges, convictions, or other legally notifiable events).

10 Privacy and Confidentiality

- 10.1 Recording and reporting are completed in accordance with legislative and University requirements.
- 10.2 The Talent Acquisition team is responsible for maintaining records pertaining to employment checks in accordance with the University's obligations under the Privacy Act 1988 (Cth) and consistent with our [Information Privacy Policy](#).
- 10.3 All employment checks are confidential and are not disclosed to any individual, except to the extent necessary for the University to appropriately assess and manage risk and meet its obligations and responsibilities.

11 Monitoring, Review and Assurance

- 11.1 The Chief People and Culture Officer is responsible for continuous monitoring of the effectiveness, application and improvement of this Procedure.

Legislative Context

Relevant Legislation or Regulations
<i>University of Western Australia Act 1911 (WA)</i>
<i>University of Western Australia Statute (2020)</i>

End