

Organisational Risk Tolerance Policy — Pre-Employment Screening

Organisation: Northbridge Advisory Partners **Policy Reference:** NAP-RISK-2024-012 **Effective Date:** Current policy version **Last Reviewed:** Current policy review cycle **Next Scheduled Review:** Overdue (past the scheduled review date) **Policy Owner:** HR Director, People & Culture **Approved by:** Managing Partner

1. Purpose

This policy defines how Northbridge Advisory Partners classifies and responds to findings from pre-employment background checks. It establishes severity levels, escalation thresholds, and decision authority for hiring risk management.

2. Severity Definitions

Severity	Definition	Decision Authority
High	Confirmed finding that directly conflicts with a mandatory requirement for the role or creates a regulatory, legal, or client-contractual risk	HR Director + Legal Advisor — candidate cannot proceed without formal risk acceptance
Medium	Confirmed finding that does not directly conflict with mandatory requirements but raises concerns about suitability, or an unresolved item that could escalate to High if confirmed	Hiring Manager + HR Specialist — must document rationale if proceeding
Low	Minor discrepancy or administrative finding with no direct impact on role suitability or compliance	HR Specialist — document and file; no escalation required

3. Automatic Escalation Triggers

The following findings must be escalated to the HR Director regardless of the assessed severity:

- Any unspent criminal conviction
- Any finding related to fraud, financial misconduct, or data protection offences
- Any unsatisfied CCJ, active IVA, or undischarged bankruptcy
- Failure to verify employment at the candidate's most recent employer
- Evidence of falsified credentials or qualifications

4. Follow-Up Item Handling

- Follow-up items must be resolved within 10 business days of the initial report.
- If a follow-up item cannot be resolved within 10 business days, the HR Specialist must escalate to the Hiring Manager for a hold/proceed decision.
- Candidates with more than two unresolved follow-up items at the time of hiring decision must be reviewed by the HR Director before any offer is extended.

5. Satisfied CCJ Guidance

- Satisfied CCJs older than 6 years are disregarded for all roles.
- Satisfied CCJs between 3 and 6 years old are classified as Low severity unless the role involves direct financial management or fiduciary responsibility.
- Satisfied CCJs less than 3 years old are classified as Medium severity for all roles.

Note: This section was added during the most recent formal review. The previous policy (NAP-RISK-2023-007) did not distinguish between satisfied and unsatisfied CCJs, and some managers may still be applying the older interpretation. HR should confirm which version applies if there is a dispute.

6. Risk Rating Calculation

Each candidate receives an overall risk rating based on the aggregate of their findings:

Overall Rating	Criteria
High Risk	One or more High-severity confirmed issues
Medium Risk	One or more Medium-severity confirmed issues, OR three or more unresolved follow-up items
Low Risk	Only Low-severity findings, no unresolved follow-up items
Clear	No findings of any severity

7. Decision Framework

Overall Rating	Permitted Action
High Risk	Offer must not proceed without written risk acceptance from HR Director and Legal Advisor
Medium Risk	Offer may proceed with documented rationale from Hiring Manager; HR Specialist must file the risk note
Low Risk	Offer may proceed; findings documented in candidate file
Clear	Offer may proceed; no additional action required

8. Limitations

- This policy does not cover security clearance vetting (BPSS, SC, DV) — see NAP-SEC-2023-008.
- This policy does not address ongoing monitoring of employees post-hire.
- Risk classifications in this policy are guidance for HR decision-making and do not constitute legal advice.