

Clifford Chance

People  
Screening &  
Onboarding



# People screening & onboarding

The highest standards of integrity are essential to the commercial success and reputation of Clifford Chance.

We expect our Suppliers to ensure ethical and professional standards are in place regarding the recruitment of their staff, and anyone assigned to support the provision of the Services to Clifford Chance and/or our clients, and to promote these standards with their subsidiaries, subcontractors and in their end-to-end supply chain.

## Minimum standards:

- The Supplier shall vet any member of staff involved in the provision of the Services, in accordance with good industry practice, applicable local laws and guidance, and at its own cost. Subject to applicable local laws, checks should include those set out below. The Supplier should discuss with Clifford Chance if it considers that any of its own equivalent policies and procedures already cover the standards set out in this document.
- The Supplier may, in consultation with Clifford Chance, undertake vetting procedures and checks in conjunction with appropriate governmental, legal, regulatory and credit bodies, authorities and agencies, and any other appropriate and reputable third-party screening providers, provided that the Supplier shall remain liable for the acts and omissions of such bodies, authorities, agencies and screening providers.
- The Supplier should retain a copy of all vetting procedures and checks undertaken, and share such copies with Clifford Chance upon request, subject always to applicable local laws.

<b>Employment History &amp; Qualifications</b>	Prior to the start of the engagement, the Supplier shall review and verify the employment history (at least two references and for at least the last three years) and academic and professional qualifications of the member of staff.
<b>Identify Verification</b>	Prior to the start of the engagement, the Supplier shall verify the identity of the member of staff using any of the following example documents and/or other acceptable documents in accordance with applicable local laws and guidance: <ul style="list-style-type: none"> <li>a) Passport</li> <li>b) Residence permit</li> </ul>
<b>Address Verification</b>	Prior to the start of the engagement, and in the event of any change, the Supplier shall verify the address of residence of the member of staff using any of the following example documents and/or other acceptable documents in accordance with applicable local laws and guidance: <ul style="list-style-type: none"> <li>a) Bank Statement</li> <li>b) Household Utility Bill</li> <li>c) Photographic ID</li> <li>d) Tax Bill</li> </ul>
<b>Credit/Bankruptcy Checks</b>	Prior to the start of the engagement and in accordance with applicable local laws and guidance, the Supplier shall undertake a credit and bankruptcy check of the member of staff (including an international credit and bankruptcy check, if applicable).
<b>Unspent Criminal Convictions Check</b>	Prior to the start of the engagement and in accordance with applicable local laws and guidance, the Supplier shall undertake a check to ensure that the member of staff does not hold any unspent criminal convictions.
<b>Right to Work</b>	Prior to the start of the engagement, the Supplier shall ensure that the member of staff is legally permitted to work and be involved in the provision of the Services in the relevant country by checking their original document(s) confirming their immigration status, or by completing an online check, and shall make and retain a clear and dated record of the check, in each case, in accordance with applicable local laws and guidance.

# People screening & onboarding

(continued)

<b>Free to Work</b>	Prior to the start of the engagement, the Supplier shall confirm that the member of staff is free to work and be involved in the provision of the Services without breaching any prior contractual obligations, restrictions or court orders.
<b>Compliance Checks</b>	Prior to the start of the engagement, the Supplier shall undertake a search against UK and international government, law enforcement, regulatory and financial databases, in accordance with applicable local laws and guidance, to ensure that the member of staff does not have any links to bribery, corruption, politically exposed persons, fraud, money laundering or terrorism (or any allegations of the foregoing), or to any other risks.
<b>Directorship and Media Checks (Senior Positions &amp; Regulated Roles Only)</b>	Prior to the start of the engagement, the Supplier shall undertake a search of all publicly available media (including social media) and a check to ensure that the member of staff not been disqualified from being a director, in accordance with applicable local laws and guidance, in respect of any senior and/or regulated members of staff.

In the event that the vetting procedures and checks undertaken by the Supplier identify any issue(s) with the member of staff, which a reasonable supplier would consider to be a concern, the Supplier shall promptly notify Clifford Chance and ensure that the member of staff is not involved in the provision of the Services unless and until approved in writing by Clifford Chance. Regardless of approval, and in accordance with our standard terms, the Supplier shall remain liable for the acts and omissions of members of staff.

# Clifford Chance

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