REDEEMERS HEALTH VILLAGE

Human Resources Department

BACKGROUND CHECK POLICY

Policy Code: HR-POL-001

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Author:	Adedayo Bazunu, Acting Chief Human Resources Officer		
Directorate:	Human Resources Department		
Approved By:	Chief Executive Officer | REMCO, RHV Board		
Date Approved:	—		

Relevant Standards

- Labour Act of Nigeria (Cap L1 LFN 2004)
- Nigeria Data Protection Act (NDPA) 2023
- Code of Conduct for Healthcare Workers
- ILO Conventions on Worker Privacy and Non-Discrimination

Amendment History

Issue	Status	Date	Reason for Change	Authorised
1	Draft	May 27, 2024	New Policy Implementation	
2	Final	June 2025	Policy Review & Update	CHRO
3	Final	April 28, 2026	Board Submission Revision	CHRO/CEO

1. Purpose

This policy establishes a clear, consistent, and legally compliant framework for conducting background checks on all prospective and current employees of Redeemers Health Village (RHV). It aims to protect the safety and integrity of our patients, workforce, and institution, and to ensure that all employees meet the professional and ethical standards required for their roles.

2. Scope

This policy applies to all candidates for employment — full-time, part-time, temporary, locum, and contract staff — as well as current employees where periodic re-verification is deemed necessary by HR or Management.

3. Policy Statement

RHV is committed to maintaining a safe and secure environment for patients, employees, and all who enter our facilities. Pre-employment and periodic background screening is a non-negotiable component of responsible workforce governance. All background checks will be conducted lawfully, fairly, and without discrimination.

4. Types of Background Checks

4.1 Criminal Record Check

Verifies whether a candidate has any criminal convictions or pending charges. This check is mandatory for all roles involving patient contact, access to controlled substances, or handling of sensitive institutional information.

4.2 Professional Credentials Verification

Confirms employment history, professional registration status with the relevant Nigerian regulatory body (e.g., MDCN, NMCN, PCN, MLSCN), job titles held, and reasons for leaving previous employment. Professional licensure verification is mandatory for all clinical hires.

4.3 Educational Qualifications Verification

Validates degrees, diplomas, certifications, and licences with the issuing institutions or relevant professional bodies. Any discrepancy between stated and verified qualifications is grounds for immediate withdrawal of an offer or termination of employment.

4.4 Reference Check

A minimum of two professional references must be contacted and documented for all confirmed hires, providing an independent assessment of the candidate's character, work ethic, and professional conduct.

4.5 Credit Check (role-specific)

May be conducted for positions carrying significant financial authority or fiduciary responsibility (e.g., Finance, Procurement, C-suite roles) to assess financial integrity. Credit checks will not be used as a basis for discrimination.

5. Consent and Notification

- Candidates must provide written consent before any background check is initiated. The consent form will specify the types of checks to be conducted and outline the candidate's rights under Nigerian law and the NDPA 2023.
- Where adverse information is discovered, the candidate will be notified in writing and given a fair and documented opportunity to explain or dispute the finding before any final employment decision is made.

6. Procedure

1. Background checks are initiated after a conditional offer of employment has been extended and written consent has been obtained from the candidate.
2. The HR Department or an authorised third-party vendor collects relevant information from official government databases, professional regulatory bodies, previous employers, and educational institutions.
3. All collected information is verified for accuracy and assessed for relevance to the specific role and risk profile of the position.
4. The hiring manager, in consultation with HR, makes a final employment decision informed by the totality of the background check findings.
5. All findings, decisions, and supporting documentation are recorded securely in the candidate's pre-employment file and subsequently in their personnel file upon appointment.

7. Confidentiality and Data Protection

All information obtained during the background check process is strictly confidential and accessible only to authorised HR personnel and relevant decision-makers. RHV complies fully with the Nigeria Data Protection Act 2023 in the collection, processing, storage, and disposal of all personal data. Background check records will be retained for the period required by applicable law and then securely destroyed.

8. Adverse Findings — Decision Criteria

An adverse finding does not automatically disqualify a candidate. HR will assess each case on its merits, considering: the nature and gravity of the finding; its direct relevance to the duties of the role; the time elapsed since the event; and any evidence of rehabilitation, mitigating circumstances, or explanatory context provided by the candidate. All decisions will be documented, are subject to the CEO/CHRO's review, and may be appealed in writing.

9. Roles and Responsibilities

HR Department

Coordinates and administers all background checks; ensures full legal compliance; maintains confidentiality; retains records; and advises hiring managers on the implications of findings.

Hiring Managers

Communicates the background check requirement to candidates as part of the offer process and obtains initial written consent before forwarding to HR.

Third-Party Vendors

Where external vendors are engaged, they must operate under a data processing agreement with RHV, comply with all applicable Nigerian laws and data protection requirements, and be approved in advance by HR.

10. Non-Discrimination

Background checks are conducted consistently and in a non-discriminatory manner. No employment decision based on background check findings will be made on grounds of race, gender, age, religion, disability, national origin, or any other protected characteristic under Nigerian law.

11. Monitoring and Review

This policy will be reviewed annually by the CHRO. Regular compliance audits will be conducted to verify adherence to this policy and applicable law. Any significant changes to Nigerian legislation or RHV's operational risk profile may trigger an unscheduled review.