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*The Background Screening Credentialing Council (BSCC) has drafted the following accreditation tip for the US Employment Screening / General Background Screening BSOAP Standard, this tip applies to US Versions 2.0, 3.0 and General Version 1.0. This response is provided for educational purposes only and does not constitute legal advice, express or implied of the BSCC, or the Professional Background Screening Association. Consultation with legal counsel is recommended in all matters of employment law.*

*For the purposes of this Letter, and to ensure our response applies to both Standards, the terms Organization and CRA may both be used.*

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**TITLE: Clause 6.10 Professionalism and Proficiency Training**

*Clause 6.10: Organization/CRA must have and follow procedures to provide initial and ongoing training to Organization/CRA workers, where training is commensurate with specific worker role and responsibilities. Organization/CRA must retain records of such training.*

**TITLE: Clause 6.11 Worker Confidentiality, Legal and Compliance Training**

*Clause 6.11: Organization/CRA must have and follow procedures to provide initial and annual training to all workers on confidentiality, security and legal compliance practices of the Organization/CRA and maintain records of such training.*

A **Non-Conformity** for Clauses 6.10 and 6.11 may look something like the following:

An Organization/CRA's inability to effectively demonstrate what training was conducted, either by showing materials, program, webinar, or training resources. Additionally, there may be a lack of proof that training was conducted. This proof may include a list or recording of the individuals who completed the training, what type of training each individual received, and the date received.

Training should also be conducted of Organization/CRA's sub-contractors. For clarity, sub-contractors refers to those workers directly engaged by the Organization/CRA's to perform the work of their business. This does not refer to sub-contractors more commonly referred to as vendors or researchers who deliver services to the Organization/CRA's.

This training can either be done by the Organization/CRA's directly or be done as a requirement of the sub-contractor engagement contract in compliance with the Organization/CRA's requirements.

In the case of Clause 6.11, the training must be done at the time of onboarding into a position, as well as annually thereafter.

The audit criteria for Clause 6.10 provides:

*Organization/CRA must provide information and training to workers which are specific based on*

*worker role and responsibilities. CRA must provide training on general requirements of confidentiality, professionalism, accuracy, and worker's role as a representative of the Organization/CRA. Organization/CRA must retain records of all such training. Training methods may include, but are not limited to: 1) written material, 2) online training, 3) training classes/webinars, 4) one-on-one training sessions, and/or 5) on-the-job training. Auditor will seek evidence of adherence to policies and procedures.*

The audit criteria for clause 6.11 provides:

*Organization/CRA must provide initial and annual training to Organization/CRA workers regarding confidentiality, security, and legal compliance practices by using one or more methods which include, but are not limited to: 1) written material, 2) online training, 3) training classes/webinars, 4) one-on-one training sessions, and/or 5) on-the-job training. CRA must retain records of such training. Auditor will seek evidence of adherence to policies and procedures.*

We hope the above provides further information and clarification on the information provided in the Standard and may be used to improve your accreditation submission.