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Operating Procedures for Managing Internal Mobility and Background Screening of Exempt Employees

Internal mobility of Harvard exempt-level staff is an integral element of any talent strategy. It fosters a culture of recognition, supports retention of high-performing staff, expands the organizational impact of key skills and experience, and enables succession planning by filling current and future skills gaps. Managers' active support of staff members' professional growth aspirations advance these ends and an organizational culture of belonging and opportunity.

Effective talent mobility depends on the accuracy and timely sharing of information about the skills, capabilities, and performance of staff members who aspire to grow into new roles within the University. To facilitate an effective and compliant process for managing internal mobility, these procedures establish requirements about internal references, background screens, and the creation of a Requisition (Req) in Harvard Careers for all open positions. The Requisition triggers the internal hiring process including pre-hire background screening and references for all internal finalists. The objectives of these procedures are as follows:

- Ensure a Req is created for all open, exempt roles regardless of position level
- Ensure obligations for internal reference checks and relevant University background screens are met in all cases of internal movement and to include waived postings
- Remove cultural barriers such as fear of perceived disloyalty or marginalization due to expressed interest in internal mobility
- Provide transparency about the process and expectations for employees seeking to move internally
- Support workforce and succession planning
- Promote inclusive excellence in the internal hiring process
- Clarify affirmative action ("AA") obligations and incorporate AA goals into the process
- Comply with applicable state and federal guidelines for hiring
- Enable effective reporting and use of data analytics on hiring activity

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I. Compliance

Compliant hiring enables effective data management, reporting, and responsible and inclusive hiring.

a. Internal references

Regardless of the University's decentralized operating model, when it comes to individuals seeking job opportunities within Harvard, we are one employer. Internal reference checks for all positions (excluding reclassifications), and in some circumstances, renewed background screens in line with University Background Screening Requirements must be performed on finalists as a condition for the individual to assume a new position.

b. Background Screens

In the employment context, background screenings, also commonly known as background checks, are the process by which an organization (employer) verifies that an applicant for employment is who they claim to be and confirms their education/credentials, employment history, and (in some circumstances) criminal and credit history. The frequency and scope of background checks may vary depending on the nature of the position to which an individual is applying or being promoted. Harvard's [Background Screening Requirements](#) are typically executed when a finalist is identified, or when the University extends a conditional offer of employment. Post-employment or renewed background checks may be conducted when a staff member transfers or is promoted (please see below for background screen information related to Senior Positions). Appropriate background screens for waived postings should be documented prior to posting in the University's applicant tracking system.

c. Affirmative Action Obligations

The hiring manager, in collaboration with local HR, must undertake a careful and regular analysis of the current composition of diversity in the hiring unit and in their respective School/CADM in the job group, and other university priorities prior to determining that a search will not include external applicants. Questions about underutilization, affirmative action, and compliant recruitment can be referred to [the Office for Equity, Diversity, Inclusion & Belonging \(OEDIB\)](#) or your local Talent Acquisition team.

II. Eligibility criteria for internal movement of exempt employees

- a. As a rule, exempt employees are expected to serve at least one (1) full year in a role before transferring with exceptions for circumstances such as:
- Mismatch of employee with role or manager (or some similar hardship)
 - Anticipated expiration of a term appointment
 - The University determines, in its sole discretion, that an earlier transfer or promotion of the employee serves its best interests
 - Exceptions to the 1 (one) year in role expectation will require review and approval by local HR Dean or Director of the current and new school or unit.
- b. As with all University hiring, internal candidates must meet the [Basic Qualifications](#) for any posted or waived position. Similarly, internal candidates are subject to [the University's Background Screening Requirements](#)



- c. Internal candidates should generally be disqualified from consideration if:
- They have received documented or verbal disciplinary action or other problematic circumstances exist. Extenuating circumstances may be considered, provided that the existence of the performance documentation/conversations is disclosed to the new school or unit prior to offer.
 - The results of the relevant background screens do not meet the hiring requirements

Note: Confidentiality will be maintained up to a certain point in support of the internal applicant and an effective process. A reference check between HR offices will be initiated after the individual has passed the first screening conversation and becomes a viable candidate. Internal candidates should notify their manager in advance of final reference checking as a **required** step in the internal movement process.

Senior Positions

Individuals who hold certain senior level management and leadership positions (“Senior Positions”) are expected to exercise a high level of conduct, judgment, and discretion regularly and reliably. These individuals will serve in such a capacity that prior conduct and lapses in judgment, decision-making, and integrity may have direct, negative impacts on the safety, security, and well-being of the Harvard community, including but not limited to financial loss and reputational harm to the University. For these reasons, criminal record checks for such positions may be job-related and consistent with business necessity.

Covered Senior Positions are determined at the sole discretion of the University and may include but are not limited to Vice President, Administrative or Executive Dean, top HR or Finance Dean/Director, Assistant or Associate Provost, Executive Director/top administrative role of a Harvard institute, initiative or affiliate, and other direct reports to Deans, Executive Vice President, President, and Provost.

Such positions should be carefully identified and may differ based on size and scope of the school or unit. The criteria should not be loosely or broadly applied or treated as a default for a criminal record check. Inclusion in this category beyond the positions listed above should be at senior leadership and HR discretion and based on the potential negative impact of lapses of judgment, decision-making, and integrity as described above.

Please refer to the HUCTW or other relevant collective bargaining agreement for guidelines around internal mobility for union members