

## APPENDIX 7

### VETTING

#### Introduction

The Company works with a range of clients and industry sectors across the EMEA Region. The Company's employees are often responsible for the creation, production and/or distribution of client Documentation, which may contain confidential and business critical information. The Company's screening processes for all temporary workers and permanent employees have therefore been developed to ensure:

- The integrity and quality of all the Company's personnel
- 100% compliance to the Company's contractual requirements
- Support the Company's Risk Mitigation Strategy

The Company's screening processes are regularly reviewed in line with increasing legislation and industry regulation to ensure they meet requirements of both the law and clients in each country in which the Company operates.

Please note failure to comply or pass the security screening in a timely manner may result in withdrawing from any contractual relationship with the Supplier.

#### Policy Statement

The Company is committed to carrying out pre-employment screening on any potential employee prior to confirmation of permanent or temporary appointment. We will ensure existing employees or those joining us through TUPE transfers meet the same requirements unless indemnification is provided in the client agreement.

#### Eligibility

This policy applies to all Supplier Personnel.

#### Countries in Scope

The following countries are considered in scope under this policy:

UK, Belgium, Czech Republic, Finland, France, Germany, Ireland, Italy, Luxembourg, Netherlands, Poland, Romania, Russia, Spain, Ukraine

#### General Principles

The Company requires all workers to comply with either Standard Level or High-Level security screening. The level of screening is determined by the client site or the role of the employee and is influenced by the level of exposure an employee has to confidential and secure information.

All checks should be carried out in each country as outlined in the policy unless prohibited under specific in-country data privacy or employment law.

The checks at each level currently encompass the following:

#### Standard level (level 1)

- Proof of Identity
- Proof of Eligibility to Work in Country
- 2 years address verification (provided on a recent utility bill, bank statement or Government issued correspondence)
- 2 years employment referencing via HR departments, previous managers, work books or job certificates and/or education history where applicable, with gap analysis

## High level (level 2)

- Proof of Identity
- Proof of Eligibility to work in-country
- 5 years Address Verification (provided on a recent utility bill or bank statement or Government issued correspondence)
- 5 years Employment Referencing via HR departments, previous managers, work books or job certificates and/or education history where applicable, with gap analysis
- Verification of Highest Education
- Criminal Records Check (Disclosure Scotland, Certificate of Good Conduct, Criminal Extract, Police Certificate as applicable)
- Credit Check to highlight any County Court Judgement's, Individual Voluntary Arrangements or bankruptcies (where available)
- Global Sanctions Check to reference international financial enforcement and sanctions bodies

In addition to these checks, there may be additional forms to be completed at either level which are client specific such as a confidentiality agreement or other security documentation. These forms will be administered and completed locally.

The requirements per country can be identified in the country matrix on page 8 of this policy. The Company reserves the right to request further relevant information if required.

## Returning to the Company employment

If an individual has previously been employed by the Company and is returning to the Company's employment, they will always be required to participate through the screening process again. This applies regardless of whether the employee previously worked on a temporary and/or permanent basis.

The only exception to this is if the employee has a gap of less than three months in their employment with the Company. In this instance no further screening will be required as their screening details will still be on file. If the gap in their employment with the Company is greater than six months, the gap will be investigated and re-screening will take place.

## Moving internally within the Company

If a recruiting manager offers a secondment or permanent position to an existing employee and therefore instigates an internal transfer, both managers are responsible for ensuring the screening of that employee is sufficient for the new role they are moving into.

## Dispensation

Individuals are not permitted to commence work without a full clearance completion certificate being issued. If the site requires the individual to commence prior to the completion certificate being issued, a Dispensation Form must be signed off by the Client Services Director and sent to Resourcing prior to the individual commencing employment or internal transfer. The request will then be sent to the relevant HR Director for final sign off.

## What checks will be carried out?

### Proof of Identity

The Company requires verification and confirmation of the individual's identity. This will usually be original documents, either:

- Passport or Travel Document (must provide a copy of front cover and photo page, **plus** any pages relating to a visa, entry clearance, or right to work scheme etc), or
- Full Birth Certificate identifying the individual as a country national (must detail at least one parents details including place of birth)
- National Identity card
- All pages of the chosen form of ID must be signed and verified in the following way:
- Printed name of person verifying the documents

- Signature of person verifying the documents
- Date the documents are verified
- And using the words of "True and certified copy" – please note that no other alternative words are permitted
- All ID must be signed on the same date and by a manager and can be emailed to Resourcing

### **Eligibility to work in-country**

The Company requires verification and confirmation of the individual's eligibility to work in the country in which they are working. Any restrictions are highlighted by our external provider.

- Passport identifying the individual as an EU or EEA National
- National Identity card
- Biometric Identity Card for Migrant Worker (UK Only)
- Official Birth Certificate (long version if UK) **plus** proof of National Insurance or Social Security Number
- Residence Permit demonstrating the individual is eligible to work in-country (limited or indefinite)
- Visa documents identifying eligibility to work in-country issued by relevant Immigration Directorate or Embassy
- Accession Worker Registration Certificate (Croatia only) Croatia is the only EU/EEA Country where there are any restrictions on employing nationals in the UK. Croatian nationals require Home Office authorization to work in the UK. Once a Croatian has completed 12 months continuous employment they become exempt from the workers registration requirement and are allowed the same rights as any other EU/EEA National.
- Official Documentation from country Immigration Directorate indicating eligibility to work
- All pages of the chosen form of Eligibility to Work documents must be signed and verified in the following way:
  - Printed name of person verifying the documents
  - Signature of person verifying the documents
  - Date the documents are verified
  - And using the words of "True and certified copy" – please note that no other alternative words are permitted

(Further guidance can be found in the Identity and Right to Work Check Guidance)

### **Proof of address**

The individual's current address will be confirmed by the individual providing proof of one of the documents below. This must be dated within the last three months and can be any of the following original documents (further guidance can be found in the Proof of Address Reference Guide):

- Utility bill (gas, electricity, water, state social security tax documents)
- Bank, building society or credit card statement
- Tenancy / mortgage agreement or statement
- Insurance document (must be a current insurance)
- Payslip (containing the individual's address)
- A search of publicly available UK Electoral Roll at the individual's current and previous addresses will be carried out

Please note that a mobile phone bill will not be accepted as a proof of address document.

All pages of the chosen form of proof of address must be signed and verified in the following way:

- Printed name of person verifying the document
- Signature of person verifying the document
- Date the document is verified
- And using the words of "true and certified copy" – please note that no other alternative words are permitted

All documentation must be signed on the same date (if more than 1 copy) and by a manager and can be emailed to Resourcing.

### **Employment History**

This will seek to confirm a 2 years history for standard screening and 5 years history for high level screening. Confirmation of full employment history will be from the appropriate HR Department and/or Line Managers (from previous employers) - in writing. If references cannot be collected or are culturally not issued the following proof may be considered:

- Job Certificates
- Official Work Books
- Wages/pay slips, State Taxation Documents
- Employment Contract and Communications
- For Pensioner - proof of receipt of pension payments

If employment history is not available, then the requirement is to check for the highest educational references available.

Any periods of self-employment will need to be confirmed by the individual's accountant, solicitors or by State Social Security communication, e.g. tax return and bank statements.

### **Employment Gaps**

The Company will check any gaps in employment history above three months, or following a period of redundancy or when the individual was in full time education. The evidence that may be requested is outlined as follows:

**Redundancy** - evidence of a period of redundancy should be provided by formal documentation relating to the terms of redundancy or evidence of the payment (this doesn't have to be in the period being referenced), taxation and wage documentation.

**Unemployment** – individuals should contact the state unemployment office to provide a letter from the country's relevant Social Security Department confirming payment of benefits to the individual or confirming non-employment status, or, a Bank Statement evidencing receipt of benefits. Individuals who were searching for employment should be able to provide confirmation emails or letters from direct employers or employment agencies, confirming receipt of CV / application forms, interview details, or refusals.

**Voluntary work** - written evidence of voluntary work during the period on the headed paper of the institution concerned.

**Travelling abroad** - individuals that have been travelling should be able to provide stamps in their passport. Individuals may have to show old passports and the Company must ensure ALL visa stamps from a passport are copied and date certified. If passport stamps are not available the following proof may be collected; hotel, car hire & card receipts, sole bank statement evidencing overseas transactions during the period, inoculation records, formal documentation from a recognised travel company/airline for booking or travel during the period in question (including flight confirmations, train, boat tickets or car hire), bank account statement showing transactions in relevant currency if combined with additional verification which supports.

**Sabbaticals** - formal documentation from the employer confirming the sabbatical and outlining the terms.

**Maternity / Paternity / Carer** - individuals caring for children should provide a child's birth certificate within the period, up to 16 years maximum, Notice of Award of child benefit payments during the period or formal confirmation of award of child tax credit in respect of the birth of the child. If not the parent, a link to relationship must be established with documentary evidence. Individuals with other caring responsibilities should provide evidence of allowances received, death certificate, power of attorney or doctor's note/communication.

**Medical illness** - individuals should be able to provide a medical certificate covering the period or documentation from a medical practitioner or establishment that verifies that the individual was undergoing treatment during that period.

**Character References** - the Company will only accept character references if no other evidence relating to the gap can be provided. Please note that under Level 3 requirements, character references are not accepted and other client terms may vary.

## **Academic Qualifications**

The requirement is to provide the highest academic qualification attained at degree or higher diploma level. Secondary education or in-country equivalent will only be confirmed if attained in the last 6 years.

- The following can be accepted as proof of full-time education (at least 20 hours per week) for Graduates, University Leavers and Mature Students
- University/College letter of acceptance, which must be on headed paper, be issued by a recognised University/College (i.e. Government funded) and not a language school (unless an international student) and must confirm acceptance of student onto course and address must match POA (or dated in period of previous address)
- Student Loan Company/LEA/SAAS Award letter (UK only), which must match that on POA (or dated in period of previous address)
- Educational Certificates
- Confirmation of withdrawal from University including relevant dates
- Introduction from a recognised University/College (as above), which must be addressed to the individual or the bank, must be on headed paper or carry an appropriate stamp and must confirm the individuals name date of birth & course, be current or dated within the period of the previous address

Where existing employees are being screened for client site requirements, academic qualification checks may not be required.

## **Criminal Record Check (CRC)**

Criminal checks will be conducted to cover the last 7 years, unless otherwise restricted. This check will identify any criminal activity recorded against the individual. For most EMEA countries the Company utilise jurisdictional court records to ascertain an individual's criminal history (Standard and High-Level Country Matrix outlines where this is not permissible). In the UK a Basic Criminality Disclosure Certificate is obtained from Disclosure Scotland verifying all unspent convictions under the Rehabilitation of Offenders Act 1974. For all countries results are compared to candidate's self-declaration and any adverse findings are advised to the client for a decision.

Please note it is a contractual requirement for the Company employees to declare any criminal convictions during employment either via their line manager or to HR.

## **Financial Probity Check**

Identify any adverse financial information recorded against the individual. This check covers adverse credit history, registered debts, including Bankruptcy, Court judgments, Scottish Decrees and Creditor Voluntary Arrangements. Only credible Credit Reference Agencies should be used to perform such checks. Credit information is limited across the EMEA region and the nature of the information reported is not uniform (Standard and High-Level Country Matrix outlines where this is not permissible). All adverse findings will be validated through current address verification procedures and advised to the client for a decision.

Please note it is a contractual requirement for the Company employees to declare any financial sanctions during employment either via their line manager or to HR.

## **Global Sanctions Check**

Requirement to check for sanctions and enforcements imposed by a financial regulator for regulatory misdemeanours, debarment lists and any other information. A cross reference check is carried out against the world's leading financial sanction and enforcement bodies, which includes international warrants issued by law enforcement bodies.

## **International checks**

When recruiting in-country, individuals may have previously lived and worked in other countries during the time period which is being verified. In such cases Individuals will need screening checks carried out in the specific countries in which they have worked or lived within the time period (where permissible and available) which will be charged at an additional cost.

### Standard and High-Level Country Matrix

Individuals who have worked or lived abroad will need screening checks carried out from that specific country which will be determined by their residency and employment history and their availability governed by in-country legislation and privacy laws as outlined below.

Country	ID Checks	Proof of Right to Work	Address Checks	Highest Education Check	Professional Qualifications	Employment Referencing	Financial Probity Checks	Criminal Records Check	International Sanctions List
Belgium	Yes	Yes	Yes	Yes	Yes				
Czech Republic			Yes	Yes	Yes				
Finland			Yes	Yes	Yes				
France			Yes	Yes	Yes				
Germany			Yes	Yes	Yes				
Ireland			Yes	Yes	Yes				
Italy			Yes						
Luxembourg			Yes	Yes	Yes				
Netherlands			Yes	Yes	Yes				
Poland			Yes	Yes	Yes				
Romania			Yes	Yes	Yes				
Russia			Yes	Yes	Yes				
Spain			current address only	Yes	Yes	Yes	Yes	Yes	Yes
Ukraine	Yes	Yes	Yes	Yes	Yes				

### Third Parties and Sub-Contractors

It is both the Company policy and the expectations of our clients that all individuals engaged on client sites are appropriately screened to the same standard. It is the managers' responsibility to ensure that all individuals are security screened to the appropriate level for the site and that any third parties and subcontractor companies have fulfilled the requirement as outlined in this policy for their own employees.

Further guidance can be obtained from the Company Procurement on the contractual obligations for all known suppliers and sub-contracting companies.

