

Pre and Post Employment Screening Policy

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1.0 SCOPE AND PURPOSE

The purpose of this policy is to set forth Danbro's Pre and Post Employments Checks Policy for employees and prospective employees. Danbro is committed to the recruitment of qualified employees, and strives to provide a safe and secure working environment by ensuring that effective recruitment processes and on-going employment checks are carried out.

The types of checks which are carried out are:

- Proof of right to work in the UK
- Employment history and references
- Professional registration and/or qualifications
- Criminal record and barring checks
- Credit history checks
- Occupational Summary
- Medical assessments

This policy applies to all employees and will be made available to applicants from the outset of the recruitment process.

2.0 DISCLOSURE OF CRIMINAL CONVICTIONS

It is Danbro's policy to require candidates to disclose any unspent convictions as part of their application. Under the Rehabilitation of Offenders Act 1974 ex-offenders are not required to disclose to prospective employers, convictions defined as 'spent under the Act. However certain posts, particularly those working with vulnerable groups, in positions of trust or sensitive areas are exempt from these provisions and in these cases all convictions must be declared and DBS clearance obtained prior to starting employment.

Danbro will not discriminate unfairly against applicants with a criminal record. Having a criminal record will not necessarily mean that an employee is unable to work for the Company; the nature of a disclosed conviction and its relevance to the post in question will be considered. This is with the exception of: a person who has unspent convictions for offences of dishonesty, fraud, violence or damage to property, which are likely to be incompatible with working for Danbro.

Where a conviction has been disclosed during the application process, a discussion will take place at the end of the interview regarding the offence and its relevance to the position. Failure to reveal information relating to unspent convictions will lead to withdrawal of an offer of employment, or termination of employment.

All employees are required to disclose criminal convictions acquired during their employment with the Company, which may be relevant to their position or that related to violence, assault or damage to property. Disclosure is to be made confidentially to the People Team who will consider the effect of the offence on the employees post. Examples of convictions relevant to positions include a driving offence for a driver position and theft or fraud for a finance position.

3.0 DISCLOSURE AND BARRING SERVICE

Danbro uses the Disclosure and Barring Service (DBS) to obtain information to enable us to assess the suitability of applicants for employment for posts working in positions of trust.

Danbro complies with the DBS code of practice including the secure storage, handling, use, retention & disposal of DBS disclosures and disclosure information and with its obligations under the General Data Protection Regulations.

DBS disclosure information will only be used for the specific purpose for which it was requested and for which the applicant's full consent will have been obtained.

Access and Retention - Once a recruitment (or other relevant) decision has been made, DBS disclosure information will not be stored unless, in exceptional circumstances, it is considered necessary to keep such information to allow for consideration and resolution of any disputes or complaints. If it is necessary to keep such information for longer than six months, consideration will be given to the Data Protection rights of the individual.

Disposal - Once the retention period has elapsed, Danbro will ensure that any DBS disclosure information is destroyed and while awaiting destruction, DBS disclosure information will be kept securely.

4.0 POSTS WHICH REQUIRE A DBS CHECK

Danbro will ensure that it has a relevant and up-to-date DBS checks for all employees undertaking regulated activity.

Danbro requires a Standard DBS Check to be undertaken for the following posts:

1. Barrister (in England and Wales), advocate (in Scotland), solicitor
2. Chartered accountant, certified accountant

In addition, Danbro requires a Basic Disclosure to be undertaken for all other posts involving frequent access to very highly sensitive, confidential information and/or client information.

A Basic Disclosure is obtained via Disclosure Scotland. This check includes unspent convictions only: <http://www.disclosurescotland.co.uk/basicdisclosureonline/index.htm>

5.0 APPLICATION PROCESS

Should Danbro consider that a position requires a DBS check, we will ensure that candidates are aware that a DBS disclosure is required as part of the application process and arrange for a DBS check at the appropriate stage.

When a candidate has been selected, Danbro will indicate that the appointment is subject to DBS clearance and the contract will be issued to this effect. If an employee requires a DBS check to perform their role, this must be satisfactorily completed prior to their start date of employment.

Danbro will only accept portability of DBS checks, which individuals may have from previous employers, as proof of satisfactory clearance when:

- The disclosure is at the correct level i.e. Basic or Standard
- Free from any offences which would prevent them from being employed by Danbro

DBS forms are to be completed by the individual and returned to the People Team for a countersignature and administration.

6.0 CREDIT HISTORY CHECK

Should Danbro consider that a position requires a credit report, we will ensure that candidates are aware that this is required as part of the application process. Danbro will arrange for the credit report to be conducted at the appropriate stage.

When a candidate has been selected, Danbro will indicate that the appointment is subject to a satisfactory credit report and the contract will be issued to this effect. If an employee requires a credit report, this must be satisfactorily completed prior to their start date of employment.

Danbro requires a credit report for individuals applying or working in positions with access to, or responsibility for money, including, but not limited to, Purchase Cards.

Credit reports will only be used for the specific purpose for which it was requested and for which the applicant's full consent will have been obtained.

7.0 EMPLOYMENT HISTORY AND REFERENCES

It is Danbro's policy to seek at least two written references, one of which must be from the candidate's last employer.

All offers of appointment are made conditional upon the receipt of two satisfactory written references. References will only be sought in advance of a conditional offer being made where the candidate has provided their express written consent.

In all cases, a suitable referee from the candidate's current or most recent employer must be provided as one of the referees unless there is a valid reason as to why this is not possible.

Danbro reserves the right to withdraw an offer of employment where it receives credible information which, if true, would cause the Company to consider the preferred candidate as unsuitable for the position.

Danbro will act reasonably when reaching decisions about whether or not to withdraw an offer of employment.

An employment reference will only be used for the specific purpose for which it was requested and for which the applicant's full consent will have been obtained.

8.0 PROOF OF RIGHT TO WORK IN THE UK

Danbro has a legal obligation to ensure that employees have the right to work in the United Kingdom. This is controlled by the Immigration, Asylum and Nationality Act 2006, to ensure that employers only employ people who are legally permitted to work in the UK.

All new employees are required to provide documentary evidence of their right to work in the UK by:

- a) Sending in a photocopy of the documentary evidence to the People Team prior to the start date of employment; and
- b) Bringing in hard copies of the documentary evidence of the first day of employment.

Danbro is required to check and photocopy certain documents and to undertake checks on employees whose right to work in the UK is time-limited.

This requirement applies to all both existing and prospective employees, irrespective of their nationality. It is a criminal offence to employ someone who does not have the right to work in the UK.

Please see **Appendix 1** for a full list of acceptable documents.

9.0 PROFESSIONAL QUALIFICATIONS & MEMBERSHIPS

The verification and collection of qualifications and professional memberships/certifications/accreditations enables Danbro to ensure that both existing and prospective employees have the right qualifications to do the job.

Danbro will ensure that candidates are informed where offers of employment are conditional upon the individual holding particular qualifications and/or professional memberships/certifications/accreditations.

Danbro is required to verify and collect certified copies of the following qualifications and professional memberships/certifications/accreditations:

- Qualifications specified as essential criterion for an advertised and/or vacant opportunity;
- All qualifications claimed as being held by an employee; and
- All required professional memberships/certifications/accreditations.

From time to time, Danbro may expand the range of qualifications and professional memberships/certifications/accreditations and existing and/or prospective employees must produce to be verified and collected, due to changes in compliance, quality and reporting requirements.

Prospective employees will be required to bring with them certified copies of all qualifications and professional memberships/certifications/accreditations claimed by them on their first day of employment.

All existing and prospective employees must submit to the People Team, certified copies of any qualifications and professional memberships/certifications/ accreditations subsequently obtained, published or claimed as being held during their employment with the Company.

The certified photocopies of qualifications and professional memberships/certifications/ accreditations will be retained by the People Team and placed on the employee's personal file in compliance with the General Data Protection Regulations.

10.0 PSYCHOMETRIC TESTING

Danbro uses psychometric testing to enhance the quality and quantity of information available to support decisions on selection, development and training decisions and as an aid to organisational change. We are committed to the highest standards of practice in the use of psychometric testing, in order to maximise the benefit of testing to the Company and the individual, and to promote fairness and equality of opportunity.

Currently Danbro uses **Elenchus** to conduct Personality and Occupational Questionnaires. These questionnaires are designed to assess people and measure differences between individuals. They are designed and developed in such a way they can be shown to measure what they claim to measure with a reasonable degree of accuracy. The testing is divided into two categories:

1. Aptitude assessment
2. Personality assessment

During recruitment and selection exercises, psychometric testing will always be used in addition to other methods of assessment including an interview. Psychometric testing is not used prior to candidate shortlisting, only after shortlisting. The use of psychometric testing will be determined by advice from the Managing Director, The People Team and the recruiting manager as early as possible in the recruitment and selection process.

Overall responsibility for testing standards rests with the Managing Director and The People Team. This responsibility includes ordering and storing reports, co-ordination and recording of all assessment activities and interpretation of assessment including feedback to the recruiting manager and candidates.

Candidates will receive adequate notice that they will be required to take a psychometric test as part of the recruitment and selection process; including the duration and adequate information about the test. Candidates will also be given the opportunity to request any reasonable adjustments prior to taking the test.

Psychometric reports will only be used for the specific purpose for which they were requested and for which the applicant's full consent will have been obtained.

11.0 MEDICAL ASSESSMENTS

Offers of appointment may be subject to the satisfactory completion of a medical examination.

Danbro will ensure that if a candidate is required to undertake a medical examination prior to the commencement of their employment, this will be indicated in the offer of appointment letter.

Where there is concern for an employee's health, the Company may require that a medical examination, by a Doctor or Occupational Health Professional appointed by the Company or through the Government-funded Fit for Work Service (FFW), be undertaken. The Company may advise the applicant or employee on the medical advice received and will consider the appropriate action to be taken. No applicant or employee with a disability will be unlawfully discriminated against.

Medical assessments will only be used for the specific purpose for which they were requested and for which the applicant's full consent will have been obtained.

APPENDIX 1

We must obtain the **original** documentation, or combination of documents, from **List A** or **List B** as proof that someone is allowed to work in the UK.

List A

The list below includes documents which will show that the holder has an on-going right to work in the UK.

1.	A passport showing that the holder, or a person named in the passport as the child of the holder, is a British citizen or a citizen of the United Kingdom and Colonies having the right of abode in the United Kingdom
2.	A passport or national identity card showing that the holder, or a person named in the passport as the child of the holder, is a national of the European Economic Area or Switzerland
3.	A residence permit, registration certificate or document certifying or indicating permanent residence issued by the Home Office, the Border and Immigration Agency, or the UK Border Agency to a national of a European Economic Area country or Switzerland
4.	A permanent residence card or document issued by the Home Office, the Border and Immigration Agency, or the UK Border Agency to the family member of a national of a European Economic Area country or Switzerland
5.	A Biometric Residence Permit issued by the UK Border Agency to the holder which indicates that the person named in it is allowed to stay indefinitely in the UK, or has no time limit on their stay in the UK
6.	A passport or other travel document endorsed to show that the holder is exempt from immigration control, is allowed to stay indefinitely in the UK, has the right of abode in the UK, or has no time limit on their stay in the UK
7.	An Immigration Status Document issued by the Home Office, the Border and Immigration Agency, or the UK Border Agency to the holder with an endorsement indicating that the person named in it is allowed to stay indefinitely in the UK or has no time limit on their stay in the UK together with an official document issued by a previous employer or Government agency with the person's name and National Insurance number (a P45, P46, National Insurance card, or letter from a Government agency)
8.	A full birth or adoption certificate issued in the UK which includes the name(s) of at least one of the holder's parents together with an official document issued by a previous employer or Government agency with the person's name and National Insurance number (a P45, P46, National Insurance card, or letter from a Government agency)
9.	A birth or adoption certificate issued in the Channel Islands, the Isle of Man or Ireland together with an official document issued by a previous employer or Government agency with the person's name and National Insurance number (a P45, P46, National Insurance card, or letter from a Government agency)
10.	A certificate of registration or naturalization as a British citizen together with an official document issued by a previous employer or Government agency with the person's name and National Insurance number (a P45, P46, National Insurance card, or letter from a Government agency)

11.	A letter issued by the Home Office, the Border and Immigration Agency, or the UK Border Agency to the holder which indicates that the person named in it is allowed to stay indefinitely in the UK together with an official document issued by a previous employer or Government agency with the person's name and National Insurance number (a P45, P46, National Insurance card, or letter from a Government agency)
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List B

The list below includes documents which will show that the holder has a right to work in the UK for a **limited period of time**.

If these checks are correctly carried out, then an employer will have a 'statutory excuse' against payment of a civil penalty for up to 12 months from the date of the check.

Repeat document checks should be carried out **at least once every 12 months**.

1.	A passport or other travel document endorsed to show that the holder is allowed to stay in the UK and is allowed to do the type of work you are offering
2.	A Biometric Residence Permit issued by the UK Border Agency to the holder which indicates that the person named in it can stay in the UK and is allowed to do the type of work you are offering
3.	A residence card or document issued by the Home Office, the Border and Immigration Agency, or the UK Border Agency to a family member of a national of a European Economic Area country or Switzerland
4.	A work permit or other approval or other approval to take employment issued by the Home Office, the Border and Immigration Agency or the UK Border Agency together with either a passport or travel document endorsed to show the holder is allowed to stay in the UK and is allowed to do the work you are offering or a letter issued by the Home Office, the Border and Immigration Agency or the UK Border Agency to the holder or to you confirming the same
5.	A Certificate of Application which is less than 6 months old issued by the Home Office, the Border and Immigration Agency or the UK Border Agency to or for the family member of a national of a European Economic Area country or Switzerland stating the holder is allowed to take employment together with a positive verification letter from the UK Border Agency's Employer Checking Service
6.	An Application Registration Card (ARC) issued by the Home Office, the Border and Immigration Agency stating that the holder is 'ALLOWED TO WORK' or 'EMPLOYMENT PERMITTED' together with a positive verification letter from the UK Border Agency's Employer Checking Service
7.	An Immigration Status Document issued by the Home Office, the Border and Immigration Agency or the UK Border Agency to the holder with an endorsement indicating that the person named on it can stay in the UK and is allowed to do the type of work you are offering together with an official document issued by a previous employer or Government agency with the person's name and National Insurance number (a P45, P46, National Insurance card, or letter from a Government agency)
8.	A letter issued by the Home Office, the Border and Immigration Agency or the UK Border Agency to the holder or to you as the potential employer or employer, which indicates that the person named in it can stay in the UK and is allowed to do the type of work you are offering together with an official document issued by a previous employer or Government agency with the person's name and National Insurance number (a P45, P46, National Insurance card, or letter from a Government agency)