

Recruitment, selection and vetting policy

1 Introduction

The Lanes Group is an employment business supplying temporary workers to work within the logistics, automotive & construction sector. The work seekers that we engage must pass thorough and robust vetting procedures before we can consider them for any placement or assignment with our clients and this policy sets out our commitment to comply with the highest standards at each stage of the recruitment process.

We have processes in place whereby we obtain feedback from our clients once placements are made.

2 Recruitment and Selection

*At the time of writing, temporary changes to right to work checks and DBS checks are in place as a result of the Covid-19 pandemic. These changes will be withdrawn in due course so are annexed to this policy, rather than referred to throughout. Once the temporary measures are lifted, the process will revert to the original system for checking which is set out below.

2.1 Face to face interviews

Before placing any work seekers on assignments, The Lanes Group meets with them face to face either in person or via video. Before meeting the work seeker, we ask them to forward a copy of their CV and advise them of the documentation they are required to forward to us or bring with them to the interview.

During the interview, a qualified consultant will assess the work seekers suitability for the role by discussing their previous work history and qualifications. The Lanes Group uses a template of standard relevant questions to ensure equality of approach and seek to understand the work seekers knowledge and understanding of protocols and to assess how they would react to various scenarios.

Provided the outcome of the interview is satisfactory, The Lanes Group will then start the pre-employment checks.

2.2 Right to work checks

The Lanes Group conducts right to work checks on every work seeker we intend to supply to our clients to comply with immigration and equality law. We will conduct a physical document check or an online check to establish a candidate's right to work. Where a right to work check is conducted using the online service, the information is provided in real-time, directly from Home Office systems and so there will be no requirement to see the documents listed below.

2.2.1 Physical right to work checks

For physical document checks we follow the three-step process set out in the Home Office Guidance: An employer's guide to right to work checks:

Step one:

We obtain the work seekers original documents. The work seeker must provide us with either one document from LIST A of the Home Office right to work checklist or any of the documents or combination of documents from LIST B of the checklist. We only accept original documents. Photocopies or electronic scans are not acceptable.

Step two:

We take reasonable steps to check that the document is valid and that the work seeker is the person named in the document.

For each document we complete the following checks:

- check any photographs are consistent with the appearance of the work seeker;
- check any dates of birth listed are consistent across documents and that we are satisfied that these correspond with the appearance of the work seeker;
- check that the expiry date for permission to be in the UK has not passed;
- check that the documents are valid and genuine, have not been tampered with and belong to the holder; and
- if given two documents which have different names, we ask for a further document to explain the reason for this. The further document could be a marriage certificate, a divorce decree absolute, a deed poll or a statutory declaration.

Step three:

We make a copy of the relevant page/s of the document in a format which cannot be subsequently altered. This can include a photocopy or a scan or where we take an electronic copy, this will be in a non-rewritable format.

Where the work seeker has provided us with a passport, we will photocopy or scan the following: any page with the document expiry date, the holder's nationality, date of birth, signature, leave expiry date, biometric details, photograph and any page containing information indicating that the holder has an entitlement to enter or remain in the UK and undertake the work in question.

For all other documents, we make a clear copy or scan of the document in full, including both sides of a Biometric Residence Permit.

All copies of documents taken will be kept securely for the duration of the work-seekers engagement with The Lanes Group and for two years afterwards. The copy will then be securely destroyed.

2.2.2 Online right to work checks

For online right to work checks we will follow the three basic steps set out in the Home Office Guidance: An employer's guide to right to work checks:

Step one:

We use the Home Office online right to work checking service in respect of an individual and will only employ the person, if the online check confirms they are entitled to do the work in question;

Step two:

We satisfy ourselves that any photograph on the online right to work check is of the individual presenting themselves for work; and

Step three:

We retain a clear copy of the response provided by the online right to work check (storing that response securely, electronically or in hardcopy) for the duration of employment and for two years afterwards.

2.3 ID checks and proof of address

In addition to the above right to work documents, we also require the work seeker to provide us with two documents to confirm their identity and proof of address. The type of documents that we accept are: driving licence, utility bill, bank statement, government document/letter which includes the work seekers national insurance number.

Copies of documents will be taken and noted with the date the documents were checked. Copies will be kept securely for the duration of the work-seekers engagement with The Lanes Group and for at least 1 year after. The copy will then be securely destroyed.

2.4 References

In accordance with Regulation 22 of the Conduct of Employment Agencies and Employment Businesses Regulations 2003 (and the terms of the Crown Commercial Service (CCS) Framework), we require references that must cover the previous five years of employment for all work seekers. One reference must be from the work seekers' most recent employer. References must be from non-family members who give their consent for the reference to be forwarded to our clients.

We will verify all references by contacting the referees directly, either by telephone or email.

Verbal references will be recorded, and a copy of the record will be sent to the referee via their school email address to obtain their written confirmation that the record is correct and their consent to forward it to a third party. If the referee does not provide their written confirmation that the record is correct and give their consent, the reference will not be accepted.

Open references may be accepted, provided that they include the following information:

- the dates between which the work seeker worked for or with the referee;
- the role the work seeker undertook;
- whether the work seeker is deemed suitable to work with children;
- whether the referee would re-employ the work seeker; and
- whether the work seeker was subject to any disciplinary action and the circumstances, if any.

References from other employment businesses must, as a minimum, include dates of employment and details of any safeguarding issues if they are known.

3 Vetting

3.1 Rehabilitation of Offenders Act Declaration

During the registration process, all work seekers are required to complete our Rehabilitation of Offenders Act Declaration and, as required for regulated sectors, disclose all spent and unspent convictions, subject to the filtering rules.

3.2 Rehabilitation of Offenders Policy

As an organisation assessing applicants' suitability for positions which are included in the Rehabilitation of Offenders Act 1974 (Exceptions) Order and using criminal record checks processed through the Disclosure and Barring Service (DBS), The Lanes Group complies fully with the DBS code of practice and undertakes to treat all applicants for positions fairly.

The Lanes Group undertakes not to discriminate unfairly against any subject of a criminal record check on the basis of a conviction or other information revealed.

The Lanes Group can only ask an individual to provide details of convictions and cautions that The Lanes Group are legally entitled to know about. Where a DBS certificate at either standard or enhanced level can legally be requested (where the position is one that is included in the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 as amended), and where appropriate (Police Act Regulations as amended),

The Lanes Group can only ask an individual about convictions and cautions that are not protected.

The Lanes Group is committed to the fair treatment of its staff, potential staff or users of its services, regardless of race, gender, religion, sexual orientation, responsibilities for dependents, age, physical/mental disability or offending background.

The Lanes Group has a written policy on the recruitment of ex-offenders, which is made available to all DBS applicants at the start of the recruitment process.

The Lanes Group actively promotes equality of opportunity for all with the right mix of talent, skills and potential and welcome applications from a wide range of candidates, including those with criminal records.

The Lanes Group select all candidates for interview based on their skills, qualifications and experience.

The Lanes Group ensures that all staff of The Lanes Group who are involved in the recruitment process have been suitably trained to identify and assess the relevance and circumstances of offences.

The Lanes Group also ensures that they have received appropriate guidance and training in the relevant legislation relating to the employment of ex-offenders, e.g. the Rehabilitation of Offenders Act 1974.

At interview, or in a separate discussion, The Lanes Group ensures that an open and measured discussion takes place on the subject of any offences or other matter that might be relevant to the position. Failure to reveal information that is directly relevant to the position sought could lead to withdrawal of an offer of employment/assignment.

The Lanes Group makes every subject of a criminal record check submitted to DBS aware of the existence of the code of practice and makes a copy available on request.

The Lanes Group undertakes to discuss any matter revealed on a DBS certificate with the individual seeking the position before withdrawing a conditional offer of employment

3.3 Disclosure and Barring Service and Update Service checks

The Lanes Group requires all our work seekers to have an enhanced Disclosure and Barring Service (DBS).

We view and take a copy of the original DBS certificate and, with consent from the work seeker, carry out a status check on the DBS Update Service. We record details of the check and the date the check is undertaken on the work seeker's file. If the Update Service check states that there is new information, we will require the work seeker to apply for a new DBS certificate before proceeding with their registration.

If a work seeker wishes to register with The Lanes Group and they are not already on the Update Service, a new DBS check will be required, and we would encourage the work seeker to subscribe to the Update Service. If they do not subscribe to the Update Service, we will require a new DBS check to be undertaken at least once a year.

The Lanes Group will undertake repeat status checks on the Update Service at least once a year, or more often if required by our clients, but no more than four times a year. We always obtain the work seeker's consent to undertake a status check.

If the DBS check shows details of a conviction or caution, in line with the Rehabilitation of Offenders Act 2014, we must email a copy of the DBS to the client.

The definition of 'work with adults', as set out in the Police Act 1997 (Criminal Records) Regulations is narrower than the definition of 'work with children' and refers to providing personal care to the adult. It is, therefore, not always the case that we will be entitled to view information relating to the adult barred lists. If there is any uncertainty as to whether a particular role is eligible for a criminal record check, we can use the DBS eligibility tool and, if necessary, obtain guidance from the DBS.

If a particular role is not eligible for an enhanced check against both the child and adult barred lists, we must not proceed with the check and if the work seeker has an existing DBS certificate covering both child and adult workforce, we will require them to undertake a new DBS for child workforce only.

3.4 Overseas Police Checks

All work seekers who have lived and worked in a single overseas country for more than six months in the last five years must provide an overseas police check.

If the work seeker is unable to provide a police check from the relevant country (for example, if the relevant country does not provide police checks), The Lanes Group may accept a statement of good conduct from the work seeker's previous employer within the relevant country. We would require the statement to include confirmation that, to the best of their knowledge, the work seeker has no criminal convictions and that they know of no reason why the work seeker should not work with children.

If we are unable to obtain a police check or a statement of good conduct, we will not proceed with the registration of the work seeker.

3.5 Letter of professional standing for work seekers that have lived or worked overseas

For work seekers seeking roles that have lived or worked overseas, The Lanes Group will request sight of a letter of professional standing issued by the professional regulatory authority where the individual worked. This check is completed to confirm the work seekers suitability for the role in line with The Lanes Group obligations under the Conduct Regulations.

Where the letter cannot be obtained and all reasonably practicable steps have been taken to obtain it, The Lanes Group will request the work seeker to provide an alternative document which confirms their suitability for the role. This may be a letter of good standing from the manager in the HR department that they worked in or additional professional references.

The Lanes Group will then inform the client of the steps taken to comply with the suitability requirements which are set out in Regulation 22 of the Conduct Regulations.

I have read and understood this policy and agree to abide by its terms.

Signed:

Dated: 01.01.2022