

Staff, Freelance and Delivery Partners Vetting Policy

1. Access to MiddletonMurray's assets

In respect of each member (or prospective member) of MiddletonMurray (MM) staff (this includes freelance staff) to be given access to our Assets, (defined as premises, partner premises, systems, information or data), we verify the following four elements outlined below:

- Identity;
- Employment History (for a minimum of past 3 years);
- Nationality and Immigration Status;
- Criminal Record (unspent convictions only).

There is no requirement to repeat the verification process for any individual member of staff, providing they remain continuously employed.

1.2 Where a staff's contract of employment transfers from one organisation to another under the terms of the TUPE Regulations, we will ensure that these Standards are being met.

1.3 In compliance with the four elements of the Standard to be verified, every member of staff will be asked to provide the following:

- Confirmation of name, date of birth and address;
- National Insurance number or other unique personal identifying number where appropriate;
- Full details of previous employers (name, address and dates), for a minimum of past 3 years;
- Confirmation of any necessary qualifications/licences;
- Educational details and references where someone is new to the workforce when these are considered necessary;
- Confirmation of permission to work in the UK, if appropriate;
- A Criminal Record Declaration Form

1.3 MM will take steps to confirm the accuracy of the information provided. Ensure that there are no obvious gaps and that the information is consistent by cross-referencing the data provided.

1.5 Following a conditional offer of employment, a 'Basic Disclosure Certificate' would be obtained to confirm the accuracy of the information regarding unspent convictions provided on the Criminal Record Declaration Form.

2. Verification of Identity

2.1 The individual's full name, signature, date of birth and full permanent address should be corroborated using as many of the following qualifying documents as is considered necessary on a case-by-case basis. Only original documents should be used for identification purposes – copies are not appropriate. Where a signature has not previously been provided (e.g. because of an e-application), the individual should be asked to provide it at a later date (e.g. at interview), for checking against relevant documentation:

- Current signed full passport, travel document, National ID Card and/or other documentation related to immigration status and permission to work;
- Current UK photocard driving licence;
- Current full UK driving licence (old version);
- Current benefit book or card or original notification letter from the DWP confirming the right to benefit);
- Building industry sub-contractor's certificate issued by HMRC;
- Recent HMRC tax notification;
- Current firearms certificate;
- Birth certificate (long version only);
- Adoption certificate;



16 TO 18



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- Marriage certificate;
- Divorce, dissolution or annulment papers;
- Civil Partnership Certificate;
- Citizencard (www.citizencard.com);
- Gender recognition certificate;
- Police registration document;
- HM Forces identity card;
- Proof of residence from a financial institution.

3. Verification of Employment History

3.1MM would, as a minimum, verify recent (minimum of past 3 years) employment history. Approaches to a previous and/or current employer would be made without the individual's prior written permission. For periods of self-employment, the individual would be asked to co-operate in providing evidence (e.g. from bankers, accountants, solicitors, trade or client references etc.), as appropriate, confirming that the individual's business was properly conducted and was terminated satisfactorily.

3.1MM will take reasonable steps to ensure references are genuine. These steps might include:

- Telephoning the author to confirm they provided the reference. In these circumstances the telephone number should be ascertained independently. A telephone number supplied by the individual being checked should not be relied upon;
- Checking the existence of the employer (e.g. that it appears in the phone book or relevant business directories).
- Alternatively, for speed and to keep delays in the process to a minimum, we may wish to e-mail former employers for confirmation of an individual's employment history. In these circumstances, email addresses would be ascertained independently.

- An email address supplied by the individual being checked would be checked over the phone

3.1 Depending on the individual's circumstances, the following actions may also be required:

- Where an individual has been overseas for 6 months or more during the previous 3 years, every effort would be made to verify employment details or obtain a reference from an overseas employer;
- Where for any reason, confirmation of employment history or an employer's reference is not available, a personal reference would be obtained from a referee of some standing in the individuals community (e.g. a GP, medical practitioner, officer of the armed forces, teacher, lecturer, lawyer, bank manager, civil servant, etc). (This is not necessary if the period of coverage is less than 6 months).
- Where an individual has been in full time education during the period, confirmation or a reference would also be obtained from the relevant academic institution(s).

4. Verification of Nationality and Immigration Status

4.1 Under the Immigration, Asylum and Nationality Act 2006, it is an offence for any person to employ a person aged 16 or over who is subject to immigration control, unless that person has valid and subsisting leave to enter or remain in the UK, which does not prohibit him from taking up the employment in question, or unless certain other conditions are fulfilled.

5. Verification of Criminal Record ("unspent" convictions only)

5.1 Individuals would be asked to complete a 'Criminal Record Declaration Form'. We will also obtain independent verification of all



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information that has been provided.

5.2 In completing the form, individuals would be required to disclose criminal convictions that are unspent under the Rehabilitation of Offenders Act 1974 (ROA). Under the Act, most convictions become spent after five years because most lead to a fine or community order. Those convictions that result in short prison sentences take longer, while convictions that lead to conditional discharge orders generally become spent after the orders have expired. Cautions, reprimands and final warnings, which are formal admonishments mainly given in police stations, usually become spent instantly.

5.3 Where unspent convictions have been declared, MM will consider the following:

- The number of offences and their seriousness. In general a number of offences and convictions resulting in prison sentences will be of greater concern than single convictions and those that have resulted in fines and discharge orders. Those offences that result in community penalties are generally more serious than those that result in fines and discharge orders, but less serious than those that result in imprisonment.
- The relevance of the offence(s). In general, the relevant offences in relation to MM's assets are property offences, notably theft and fraud, but also criminal damage. Other offences, such as drink-driving, assault and public order offences may in some instances be serious, but are not necessarily relevant to a particular post.
- The length of time since the offence occurred. While there will always be exceptions to this rule, Home Office statistics show that if someone goes more

than two years from conviction or release from prison without re-offending, their chances of being cautioned or convicted again is considerably reduced.

- The nature and background of the offence. Offence labels tend to sound worse than the behaviours they describe and the circumstances behind individual offences vary from the mitigating to the sorely aggravating. It is important to speak to individuals about their offences in order to make assessment about whether they represent a risk or not.
- The individual's attitude to the offence and evidence of change. Many offenders will regret what they have done and feel a sense of remorse. Many will have been young at the time of their offences and will have matured and settled down and are unlikely to get into trouble again. This is especially true of young women but is also true of young men, although generally they take longer to settle down.

6. Post Verification Process

- 6.1 Details of the checks carried out in each case and the results should be recorded and the completed verification record would be retained on the individual's personnel record.
- 6.2 We will ensure that all staff fully complies with the provisions of the Data Protection Act 1998 in respect of access to and retention of data held by them.
- 6.2 We will ensure that all staff complies with requirements of our funders.

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16 TO 18



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