We, Universal Security Services Group (USSG) Ltd ('USSG ' and/or 'the company') aim to provide equal opportunities in employment, and our recruitment and selection procedures reflect that. We correctly train our HR staff or other such members of staff who have recruitment and selection responsibilities, to ensure that they avoid unlawful discrimination, both conscious and the unconscious varieties.

Our policy is to hire, promote, and advance employees solely based on merit. All decisions related to hiring, recruitment, promotion or advancement will be made on this basis.

From time to time, all job descriptions, if utilised, shall be reviewed, and revised to make sure that they comply with our company's policies, practices, and procedures.

When we place advertisements for job vacancies, we will take these issues into account, and they will be non-discriminatory in nature.

We are committed to providing fair treatment to each job applicant and considering them only based on their ability to carry out the essential functions of the job. All job interview questions must be of a non-discriminatory nature, and only concern job requirements.

Recruitment and Screening – Security Guarding

1. Purpose and Introduction

1.1 This procedure defines how USSG recruits and screens all staff. Successful completion of security screening is one criterion upon which the decision to grant confirmed employment beyond the period of conditional employment is based.

1.2 The company will not employ persons whose history indicates that they would be unlikely to resist the opportunities for illicit personal gain, or the possibilities of being compromised, or the opportunities for creating any other improper breach of security, which such employment might offer.

2. Scope

2.1 This procedure covers all personnel employed at USSG who are engaged in security and personal data handling.

3. References

3.1 All procedures are written to Standards, Codes of Practice and Schedules as listed within AS11 Standards Adherence Document

4. Definitions

4.1 **Screening Period**

To be not less than 5 years immediately prior to the date of the application for relevant employment or transfer to relevant employment, or back to the date of ceasing full-time secondary education if this date is more recent.
In addition, a consumer information check will be undertaken.

4.2 **Conditional Employment**

The initial period of employment for a new employee during which security screening is required is twelve weeks conditional employment for a five-year screening period.

4.3 **Ancillary Staff**

Persons involved in ancillary activities such as administration, personnel, building maintenance and cleaning.

Responsible	Process	Notes
	Job Application and Interview	All new personnel will only be selected after the following procedures have been adopted. **Risk Management** Individuals will not be selected whose career or history indicates that they would be unsuitable for the role. Where staff is inherited under TUPE legislation then Employment Law Regulations should be considered. All applications, interviews and screening procedures MUST be dealt with in strict confidentiality.
Company Management	After contact with or from USSG , the prospective employee will be interviewed for suitability for the role and shall fully complete the company's Job Application Form (JAF).	Interview applicants identified as suitable for the role. Prospective employees must be aged 18 years or over. Nighttime workers are asked if there is anything in their circumstances which is detrimental to them working night shifts. Applicants for nighttime shift work will be offered a free medical assessment. (BS7499 requirement)
HR Dept	On receipt of the completed JAF a personnel file for each individual will be created and filed under that person's full name.	All records appertaining to that individual will be maintained in that file for the course of their employment, and up to a period of six years after leaving our employ.
Company Management	After the JAF has been fully completed and the contents indicate suitability for employment in the Security Industry - then, and only then, will the employee be given authorisation for employment with the company.	Where a Job Application Form is received and it is decided not to offer the applicant employment with the company, the applicant will be informed of this decision by letter or email. HR will also advise appropriate staff of the same.
HR Dept &	When completing the JAF, the applicant is requested to bring original	Where applicants hold a valid and current SIA Licence the original should be seen and verified against

Company Management

documents to support ALL screening requirements as detailed within the JAF.

All Security Guard applicants MUST hold a current and valid SIA Licence that covers them for the sectors they are applying to work in.

HR Dept

As part of the applicant's recruitment; screening checks will be conducted regarding the applicant's education and career history.

the public register of licence holders. The document details should be cross-checked against other information provided by the applicant. A copy of the public register search result should be retained on file.

The applicant must provide evidence of the following to confirm their identity and address:

These are either a:-

- Valid Passport
  Or
- Birth Certificate
  & Valid Photo ID
  (Driving Licence, or
  Governing Body's Pass)

to confirm their Identity, and

Either 1 example of an addressed document dated within 3 months of hire from a :-

- Utility bill
- Rent Book
- Military Service Certificate
- Deed Poll Certificate
- Official Correspondence

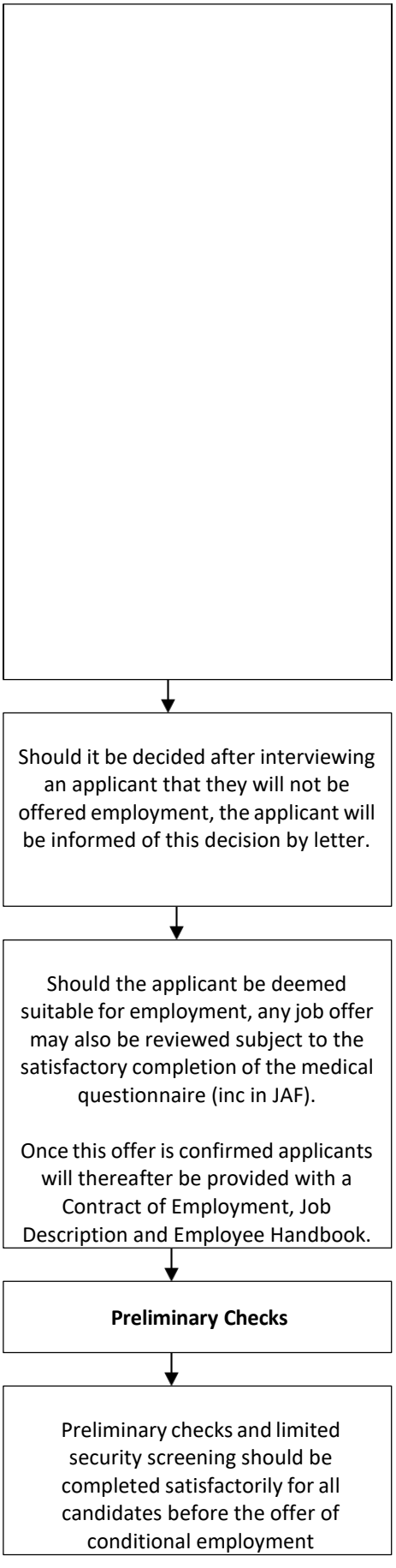
Where applicable, original documentation must be checked by a UV light to ensure authenticity.

The applicant must be informed of this and told that anything that appears to be a forgery would be reported to the relevant authority. All copies of the original documentation taken must be signed and dated confirming authenticity by a USSG representative.

It must be shown on the Vetting Progress Checklist that this information was verified, by whom and when.

(for ACS purposes only)

- When frontline licensable employees are recruited a skills assessment must be conducted at the



interview stage and/or during the recruitment process to identify any immediate training needs they may have

- When frontline licensable employees are recruited with a pre-existing licence linked qualification a test must be conducted at the interview stage to assess their level of competence in the licence linked training
- Testing of competence and skills assessment may take place through: -
- Completion of the company's SIA Linked Skills Assessment form, or
- Targeted questioning, such as scenario posing, for example completing an incident report

HR Dept

Should it be decided after interviewing an applicant that they will not be offered employment, the applicant will be informed of this decision by letter.

It should also be noted that this is also subject to satisfactory screening.

HR Dept

Should the applicant be deemed suitable for employment, any job offer may also be reviewed subject to the satisfactory completion of the medical questionnaire (inc in JAF).

Once this offer is confirmed applicants will thereafter be provided with a Contract of Employment, Job Description and Employee Handbook.

It should also be noted that this is all subject to satisfactory screening.

HR Dept

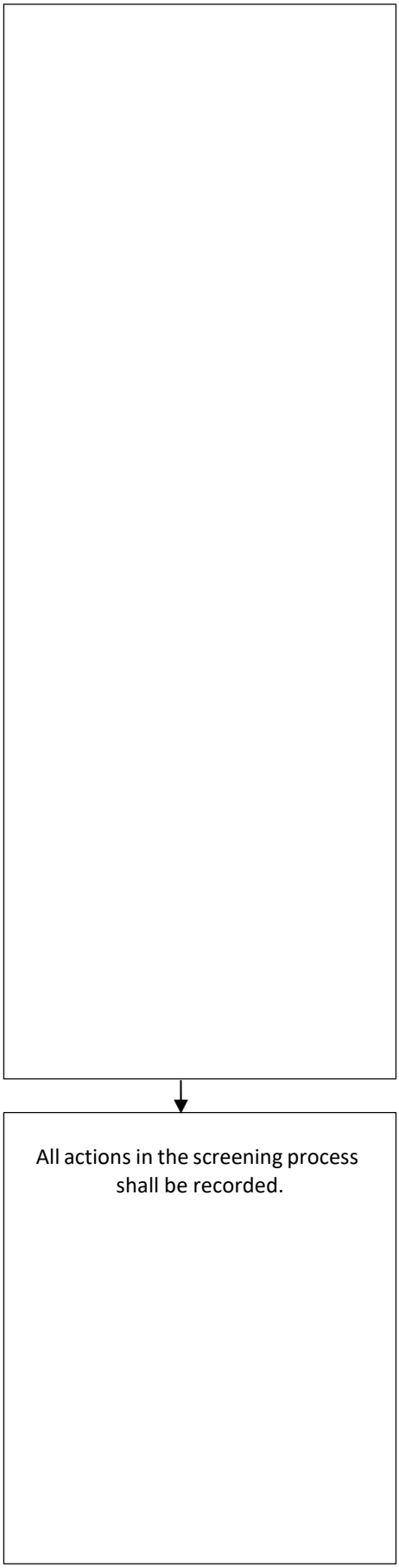
Preliminary Checks

Preliminary checks and limited security screening should be completed satisfactorily for all candidates before the offer of conditional employment

Preliminary checks should, as a minimum, include the following: -

- Establishment of a screening file
- A fully completed Job Application Form and a full review of the information provided to confirm

		that the individual is likely to complete security screening • Confirmation of identity including verification of documents • Confirmation of current history checks
Managing Director & HR Dept	**Screening**	Shall be responsible for the security screening of all applicants.
HR Dept	The staff responsible for screening should be screened in accordance with the recommendations of British Standard 7858 (Current Version). Other support staff if engaged in screening should be trained for the duties envisaged. Training should be reviewed at least annually. A separate screening file shall be created for each individual subjected to security screening. The screening process MUST ensure that the applicant has a month-by-month record of continuous career history supported by former employers, government departments, educational authorities etc.	Confirmation from any such organisation shall be in writing. The screening process MUST be of a minimum of the last five years. As a standard USSG screen up to five years.
HR Dept	USSG screening is dependent upon those having knowledge of the person being screened, supplying information and references.	Every effort must be made to encourage persons and firms to cooperate in supplying information and references in respect of their previous employee when requested to do so, unless there are good and substantial reasons for not supplying such information and references.
HR Dept	Screening shall consider the following information as required:-	• Date of leaving full-time secondary education; in the case of applicants who state that they ceased full-time secondary education less than five years prior to the application for employment; the written record should confirm the date of leaving. For individuals who left at the end of the school year the



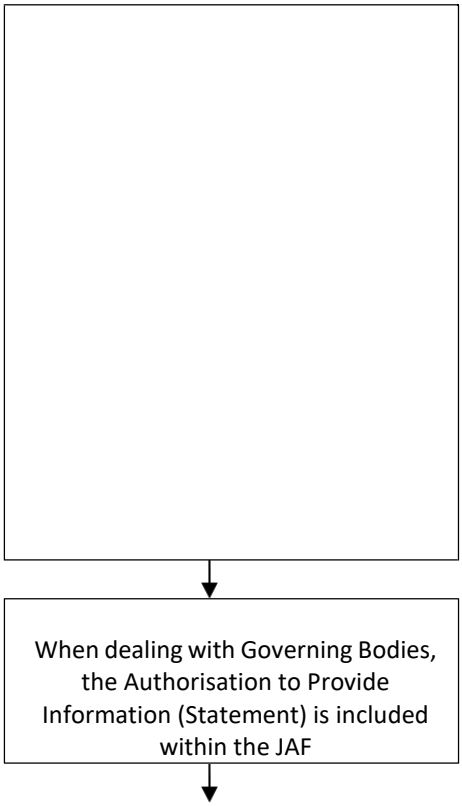
HR Dept

All actions in the screening process shall be recorded.

period up to 1st November should be considered as part of the school career. For individuals leaving at other times of year the period of grace should be limited to two months

- Periods of employment; obtained from previous employers, although reference to a current employer shall not be made without the applicant's prior permission.
- Periods of registered unemployment; obtained from the DWP or other Government agencies. Where a Government Department states that records are not available, the period for which the record is not available shall be treated as a gap.
- Periods of self-employment; obtained from the Inland Revenue, Customs and Excise (VAT), Bankers, Accountant, Solicitor, Trade or Client references, etc, as appropriate. Evidence shall also be obtained confirming that the applicant's business was properly conducted and was terminated satisfactorily.
- Periods of residence abroad; obtained where possible by e.g., approaches to employers, confirmation of dates obtained from passports and work permits by contact with appropriate Embassies and Consuls.

All screening information shall be confirmed in writing. However, for the purpose of offering the candidate conditional employment it is possible to accept oral confirmation of screening information. It is essential however that written evidence should be obtained before commencement of full employment. The maximum period allowed of conditional employment is twelve weeks for a five-year screening process and 16 weeks for more than five years. Cases extending beyond the maximum may be extended by a



maximum of four weeks subject to evidence that written requests to verify the information supplied have been made and subject to approval by an executive.
Where screening has not been completed successfully relevant employment should not continue after the period allowed for security screening.
Where the screening file is completed within 31 days of the end of the period allowed the individual may be offered the opportunity of returning to relevant employment. After 31 days the individual needs to be rescreened.

HR Dept

When dealing with Governing Bodies, the Authorisation to Provide Information (Statement) is included within the JAF

Where appropriate, the Governing body will be advised of this authority when requesting screening information about the applicant.

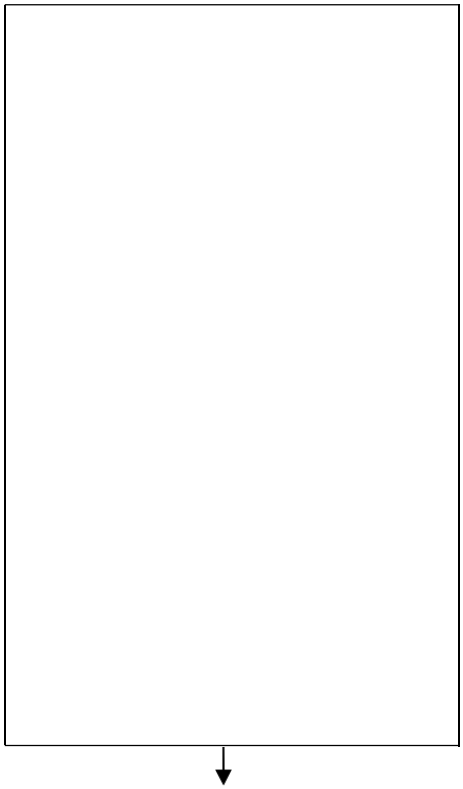
Limited Security Screening (Including Oral References)

HR Dept

Screening enquiries, however made, should be subject to the following:

Procedures in the respective Vetting Progress Checklist should be continually reviewed for each employee throughout the screening period;

- Records relating to such employees should clearly show the dates that conditional employment commenced and when it is to cease.



- Screening files are separated within the personnel files and should be retained during employment. Screening files should be retained for up to six years after cessation of employment. All records should be maintained and stored securely.
- Screening controllers and those involved in the screening process should themselves be subject to such screening and should sign a confidentiality agreement relating to the disclosure of confidential information.
- For further information Global watchlist check. Cross-referencing the individual's name(s) against various sanctions, watchlists and fraud databases, including, but not limited to, the HM Treasury's consolidated list of financial sanctions targets in the UK (see www.hm-treasury.gov.uk/fin_sanctions_index.htm).

HR Dept

Right to Work Checks

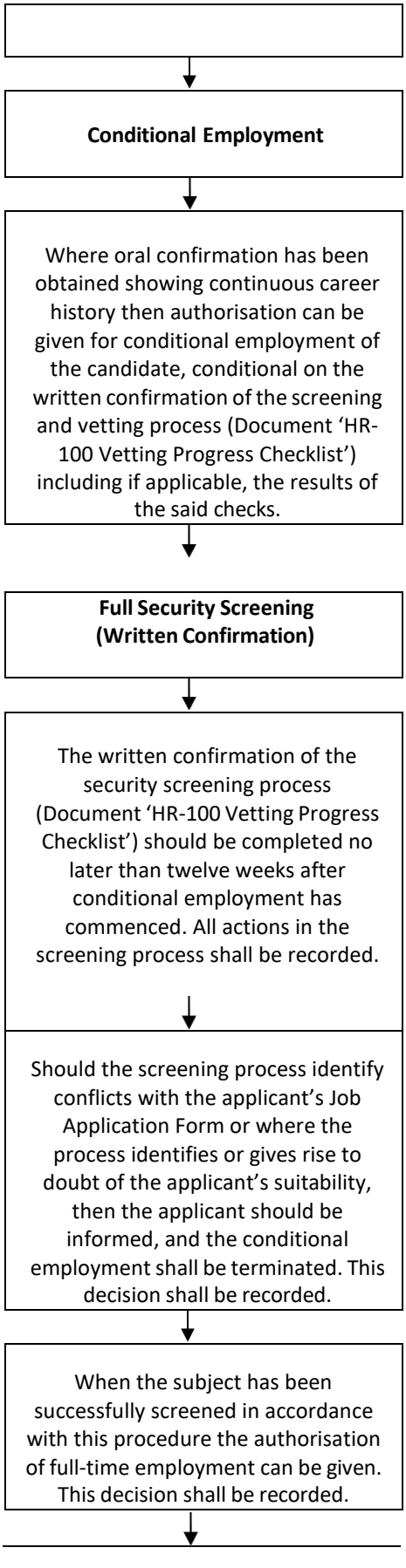
All Right to Work Checks must be carried out for employees who have applied for employment with the information provided by their completed Job Application Form

As an employer you have a responsibility to prevent an illegal migrant working in the UK.

The documents that establish a person's entitlement to work can be found at Appendix A.

To comply with legislation, you **MUST** follow the procedure set out in Appendix A.

You must check and satisfy yourself that all documents are original, genuine, have not been tampered with and



HR Dept

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relate to the person applying for employment.

An offer of conditional employment should not be made unless: -

- The level of risk in the intended employment has been considered and is acceptable
- Preliminary checks have been completed satisfactorily
- Limited security screening has been completed satisfactorily

Conditional employment should in no case continue for a period exceeding twelve weeks.

Shall continually monitor the screening process for each conditional employee throughout the twelve-week conditional employment period.

HR Dept

Gaps in Career Record

Where there are gaps in the career record which cannot be independently confirmed in accordance with the written verification procedure, the following procedure should be followed:-

- The Document 'HR-006 Statutory Declaration' should as a minimum confirm that the applicant was where he or she alleged to be.
- Applicants must obtain the information to complete the above document, under the provisions of the Data Protection Act (Information from this source can only be supplied by the person being screened and care should be taken to ensure that the information supplied is authentic).
- The provisions of the Statutory Declaration document is made before a Solicitor, Commissioner for Oaths, Notary Public or Justice of the Peace, by the person being screened as detailed therein.

Existing Employees

HR Dept

Persons who at the time of these procedures being introduced are already in the employment of USSG, and who have not already been recruited in accordance with the above, will submit a Job Application Form and undergo the screening procedures.

1. **Subcontractors**

2. Persons who are engaged on a subcontractor basis should also be subjected to such screening

Where subcontractors are used the following must be obtained: -

- Evidence that such individuals have been screened in accordance with BS 7858.
- Where they are individuals supplied through a company this can include current proof of the company's UKAS accreditation which includes BS 7858 in the scope or that they are a SIA approved contractor.
- In both cases a written statement that the individuals being supplied have been screened in accordance with BS 7858 is required.
- (for NSI - a written statement is required for **each** individual being supplied)

Or

- Full security screening is to be carried out of all the relevant personnel

Appendix A

1. Right to Work Checks

As an employer you have a responsibility to prevent illegal migrants working in the UK. Failure to do so may render you liable to a fine if the person you employ is subject to Immigration Control, over 16 and not entitled to undertake the work in question.

However, under the law you will have an excuse against such liability if you check and copy certain **ORIGINAL** documents **BEFORE** someone starts working for you.

If you **KNOWINGLY** employ a person who is not permitted to work, you will not have an excuse and could face a fine and/or imprisonment.

In addition to the Proof of Address requirement, a detailed within the company's Job Application Form (JAF).
The JAF also advises of the requirement to provide Proof of Identification, not limited to both documented and personal photograph evidence.
Such documents that establish a person's entitlement to work are split into two lists (detailed below, scroll down) from which :-

List A – which allow the person to work for you for an indefinite period and **ONLY** need checking once.

Or

List B – which allow a person to work for a limited time only and **MUST** be subject to repeat checks at least once every twelve months.

To comply with legislation the following procedure **MUST** be followed:-

The prospective employee (or existing employee if carrying out Repeat Checks) must provide to you, either:-

- One of the single document or document combinations specified from **List A**

or

- One of the single document or document combinations specified from **List B**

2. You Should Only Accept Original Documents

You **MUST** take all reasonable steps to check that documents are valid, relate to the applicant and allow them to do the work in question.

You should check that photographs are consistent with the appearance of the applicant (i.e.. you must see them in person), that the dates of birth are consistent, that expiry dates of any limited leave to enter or remain within the UK have not passed.

Check that any visas, stamps etc, allow the applicant to do the work on offer, satisfy yourself that the documents are genuine and have not been tampered with and if two documents are given with different names ask for further documents to explain this, i.e.. Marriage certificate, divorce decree etc.

You must make a photocopy or scan of the relevant pages of each document. In the case of a passport, the front cover and any page that provides details of nationality, photograph, date of birth, signature, date of expiry or biometric details, and:-

Any page containing UK Government endorsements indicating that the holder has an entitlement to be in the UK and is entitled to undertake the work on offer.

Other documents should be copied in their entirety.
You should keep a record of every document copied and the copies should be stored securely whilst the person works for you and for up to six years thereafter.

Acceptable documents:-

3. List A - Single Document from the following:

- A valid passport showing that the holder is a British Citizen or stating that the holder is a 'Citizen of the UK and Colonies' AND 'has the right of abode in the UK.'
- A valid passport or identity card showing the holder is a resident of an EEC country or Switzerland.
- A valid residence permit, registration certificate or document indicating permanent residence.
- A permanent residence card.
- A valid 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.

4. List A – Or a Document Combination of the following:

- A valid Photo ID with the full name of the person.

Plus, one of the following:-

- An Immigration Status Document endorsed to show that the holder is allowed to stay indefinitely in the UK.
- A full UK birth certificate issued which includes the name(s) of at least one of the holder's parents.
- A full UK adoption certificate which includes the name(s) of at least one of the holder's parents.
- A birth certificate issued in the Channel Islands, the Isle of Man or Ireland.
- An adoption certificate issued in the Channel Islands, the Isle of Man or Ireland.
- A certificate of registration or naturalization as a British citizen.
- A letter issued by the Home Office or Border Agency which indicates the holder is allowed to stay indefinitely in the UK.

5. List B - (to be checked at least once every twelve months) - Single Document from the following:

- A valid passport or travel document endorsed to show that the holder is allowed to stay in the UK and is allowed to do the work in question, provided it does not require the issue of a work permit.
- A Biometric Immigration Document issued by the Border Agency which indicates that the person named in it can stay in the UK and is allowed to do the work in the question.

6. List B – Or a Document Combination of the following:

- A work permit or other approval to take employment issued by the Home Office or Border Agency.
- Along with actual permission from the Border Agency for the person to take the employment in question. You must also ensure that the applicant has been given leave to enter and remain in the UK.

or

- A letter issued by the Home Office or Border Agency to the holder or the employer confirming the same.

7. List B – Or a Document Combination of the following:

- A Certificate of Application issued by the Home Office or Border Agency to or for a family member of a national of an EEC country or Switzerland stating that the holder is permitted to take employment which is less than six months old.

or

- A residence card or document issued by the Home Office or Border Agency to a family member of a national of an EEC country or Switzerland.

or

- An Application Registration Card issued by the Home Office or Border Agency stating that the holder is permitted to take employment.

8. List B – Or a Document Combination of the following:

- A document issued by a previous employer or Government agency which contains the National Insurance number and name of the holder.

And any one of the following documents:-

- An Immigration Status Document issued by the Home Office or Border Agency to the holder with an endorsement indicating that the person named in it can stay in the UK and is allowed to do the type of work in question.

or

- A letter issued by the Home Office or Border Agency to the holder or the employer which indicates that the person named in it can stay in the UK and is allowed to do the work in question.

If, when rechecking documents, an employee provides a document or documents from List A, no further checks are necessary for the duration of that employment

The Managing Director shall review this policy annually or following significant changes.

Rashid Baig

For Universal Support Services Group (USSG) LTD
This policy was last reviewed as per Header