



EMPLOYMENT SCREENING POLICY

Introduction

1. Employment screening enables the City of London to:
 - Make safer, legal and more informed recruitment and retention decisions; and
 - Comply with organisational security requirements, by minimising the risk of employing individuals seeking to use their position in an illegal or inappropriate manner.
2. This policy supports the City of London's recruitment procedures, risk management practices and [anti-fraud and corruption strategy](#).
3. This policy applies to all candidates seeking positions of employment, or casual work, with the City of London, including internal transferees, and current employees / casual workers of the City of London as categorised within the policy.
4. Candidates applying for positions within, and employees of, the City of London Police are **not** covered by this policy and should instead refer to the City of London Police procedures.

General Principles

5. The City of London will verify key application data and vet information via third parties where it impacts on the individual's suitability for the role, or where there are concerns over the authenticity of the information provided by the applicant. Some random vetting checks will additionally be carried out.
6. The City of London will additionally carry out appropriate checks on existing employees for such reasons as:
 - verifying their ongoing right to work in the UK; and
 - Periodically renewing appropriate checks (e.g. CRBs and time bound memberships).

Where appropriate, on-going monitoring will also take place through the Independent Safeguarding Authority (ISA).
7. Screening procedures will be carried out in a uniform and non discriminatory manner, proportionate to the risks of the post (as detailed in [appendix 1](#)) and will comply with the City of London's [Data Protection principles](#).

Pre-employment Screening

8. Within recruitment literature, candidates will be informed of the pre-employment screening requirements of the post they are applying for.



9. Recruiting managers will check, at the point of interview, proof of the individual's identity, right to work in the UK, and any essential qualifications / professional memberships. Guidelines for managers on verifying these documents are provided in [appendix 2](#).
10. Further pre-employment checks will not be undertaken until a conditional offer of employment has been made and accepted and will be completed by HR. Where appropriate, candidates will be asked to provide signed consent for pre-employment checks to be made.
11. All offers of employment will be conditional pending the completion of such checks to the organisation's satisfaction. Ordinarily, candidates will not be able to start working for the City of London until all relevant checks are completed. Exceptions will only be made, following a risk assessment, where the risk of a vacant post far outweighs the risk of commencing the individual's employment before the checks are completed. In such circumstances, appropriate safeguards will be put in place.
12. Issues raised during pre-employment screening (including the inability to verify details) must be risk assessed (see [appendix 3](#) for information) and should, where appropriate, be discussed with the candidate (to provide them with the opportunity to explain any inconsistencies) before considering the withdrawal of an offer of employment.
13. Any false, incomplete or misleading statements made by an applicant may lead to withdrawal of an offer of employment or dismissal.

Screening and self disclosure during employment

14. All employees who work directly with children or vulnerable adults will be CRB checked every three years on a rolling programme.
15. Where professional memberships or registrations are time bound, the City of London may require the employee to provide confirmation of renewal. Where an individual has a professional membership or registration revoked, they must disclose this to their line manager without delay.
16. Where an individual is working in the UK on a visa or work permit of a fixed term, the City of London will require the individual to provide proof (see section on '[Right to Live and Work in the UK](#)' within [appendix 1](#)) of their continuing right to live and work in the UK before continuing their employment.
17. It is a condition of employment that individual's inform the City of London Corporation if they are convicted of any criminal offence (including driving offences) during their association with the organisation.
18. Disciplinary action (including dismissal) may be taken where screening or self disclosure during employment reveals information which compromises the employment of an individual.

Responsibilities

19. Individuals must provide timely, authentic and accurate information relating to employment screening. Employees additionally have a responsibility to disclose information to the City of London which may compromise their ability to continue in their role (e.g. criminal convictions / loss of professional status).
20. Recruiting managers are responsible for:
- Determining the level of employee screening checks required for the post, in line with this policy;
 - Checking / verifying the authenticity of documents at interview stage;
 - Carrying out risk assessments and determining, with advice from the Corporate Recruitment Unit (CRU), whether information obtained (or which cannot be verified / is missing) during pre-employment screening is relevant to the individual's suitability for the role and should, therefore, affect the recruitment decision.
21. The CRU is responsible for:
- verifying and / or vetting required documentation and completing random spot checks;
 - Communicating appropriate information to recruiting managers;
 - recording that checks have been carried out and retaining / disposing of information in accordance with the City of London's [records retention guidance](#); and
 - providing further guidance and advice on this policy where necessary.

Monitoring

22. The CRU and Security & Contingency Planning team will monitor trends in applications and employment checks, particularly relating to multiple applications from unsuitable individuals and the use of bogus referees. The CRU will additionally conduct periodic vetting checks through relevant third parties on a random sample of successful applicants work history and education / qualification details.
23. Departmental HR will monitor the dates that individuals' right to work in the UK expire and CRB checks are due for renewal, and take appropriate action.

Further information

24. This policy is supported by the [Criminal Records Bureau Disclosures Policy](#) (Section B19b of the Employee Handbook).

PRE-EMPLOYMENT SCREENING REQUIREMENTS

- Checks carried out will be proportionate to the risks of a particular position. Where posts fall into more than one of the categories below, checks must be carried out to satisfy each.

[All positions](#)

[Positions requiring qualifications](#)

[Working with children / vulnerable adults](#)

[Access to sensitive / secure information](#)

[High profile / senior positions](#)

[Cash / asset handling positions](#)

[Events positions](#)

[Security positions](#)

- Candidates will always be made aware of the type of verification / screening that will take place during the recruitment process.
- All documents verified / copied MUST be originals.
- All verification / vetting will be carried out by the CRU (or department HR for casual staff) unless otherwise stated.

All positions

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All candidates, regardless of position, must have the following checks completed:

Check	Evidence required	Verification / Vetting
Proof of identification	<p>Evidence provided should confirm name, date of birth and visual (photographic) identity. Suitable original (i.e. not photocopied) documents are:</p> <ul style="list-style-type: none"> Full birth certificate (plus photo evidence) Passport Photo driving licence <p><i>(Plus a document explaining the name change where the evidence is in another name than that currently being used).</i></p>	<p>Checks by recruiting manager at interview – see guidelines in appendix 2 (copies sent to CRU / departmental HR).</p>
Right to live and work in the UK	<ul style="list-style-type: none"> UK Passport Passport showing right of abode in UK Passport or National ID card for European Economic Area (EEA) State or Swiss national UK Residence Permit issued to EEA or Swiss national (see appendix 5 for list of countries in EEA) Passport, travel document or 	<p>Checks by recruiting manager at interview – see guidelines in appendix 2 (with copies sent to CRU) to ensure:</p> <ul style="list-style-type: none"> The documents belong to the individual in possession of them (i.e. they are not an impostor) The documents are genuine The documents have not been tampered with The information in the documents does not contradict

Check	Evidence required	Verification / Vetting
	<p>residence document issued by Home Office showing right of residence as family member of EEA national (see appendix 5)</p> <ul style="list-style-type: none"> • Passport or travel document showing holder exempt from immigration control, indefinite leave to enter, remain or no time limit on stay • Passport or travel document showing current leave to enter, remain and permission to take employment in question (provided no work permit is required) • Registration card, or identity card issued by the UK Borders Agency, indicating holder is entitled to take employment in UK • Evidence of permanent or other approval to take employment issued by Work Permits UK • Workers Registration Scheme Certificate (see appendix 4) 	<p>other information provided by the individual during the recruitment process.</p>
Proof of address	Utility Bill (NOT a mobile phone bill) or Confirmation from electoral register	Checks by recruiting manager to ensure the document is genuine, has not been tampered with and is no more than 3 months' old.
Five years' employment history	Employment history recorded on application form	Ensure at least five years continuous employment. If there is cause for concern, verify the information provided with the relevant employing organisation/s by phone, letter or email.
Two satisfactory references	Written references returned by two relevant individuals as provided on the application form (e.g. the individual's line manager / supervisor / academic tutor from their current / most recent employment / education). These must not be from a personal referee.	Check the returned references are from the person & organisation stated on the application form. Check details provided match those provided by the employee. If a reference is ambiguous or implies an area of concern, verify its meaning with the person who supplied it.
Medical clearance	Pre-employment health questionnaire	Clearance provided by Occupational Health Service.
Declared Convictions	Convictions declaration on application form	An assessment will be made by the recruiting manager, with

Check	Evidence required	Verification / Vetting
		advice from the CRU, of the relevance of the conviction to the job role.

High profile / Senior Officer positions

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Those involved in high profile events and meetings with dignitaries / high profile personnel (E.g: Town Clerk, Deputy Town Clerk, Remembrancer, Chamberlain) may be subject to higher level security checks carried out by the Security & Contingency Planning Team, as deemed appropriate to the role.

Positions requiring academic/professional qualifications/memberships [Back to top](#)

Positions for which an individual must hold a specific qualification or membership of a professional body to be eligible to undertake the role (E.g. Accountancy positions), or where a specific level of qualification was an essential short-listing criteria.

Check	Evidence required	Verification / Vetting
Relevant qualifications	Certificate of relevant / highest level qualifications	<ul style="list-style-type: none"> • Check document to ensure it is genuine and has not been tampered with. • Compare details on certificates etc with those provided by the Applicant. • Where there are concerns, or where there is a legal/industry requirement to have current and valid qualifications or memberships, verify these by contacting the relevant awarding bodies.
Membership of relevant professional bodies	Current membership certificate eg. Corgi registration, CIPD, SIA	

Positions requiring cash / other asset handling

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Those working with money or high value assets, e.g. Payroll positions, Benefits Officer, Curator, Conservator, IS Technical Support for finance systems, Plate Room positions will be subject to the following additional checks:

Check	Evidence required	Verification / Vetting
Basic Disclosure Scotland	Basic Disclosure certificate (this will be sent by Disclosure Scotland to the employee, who will be required to forward it to the CRU / departmental HR).	CRU / departmental HR will assess whether disclosed convictions impact on the candidate's suitability for the role, in discussion with the recruiting manager.



Positions working with children and/or vulnerable adults

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Positions which require individuals to work with children / vulnerable adults (E.g. all positions within schools, some positions within Community and Children's Services – see www.crb.gov.uk for a list of all staff categories) will require the following additional checks:

Check	Evidence required	Verification / Vetting
Criminal Record Bureau Disclosure	See <u>CRB Policy</u>	CRU / departmental HR will assess whether disclosed convictions impact on the candidate's suitability for the role, in discussion, where possible, with the recruiting manager.
Independent Safeguarding Authority registration	Proof of registration with the ISA (required from 12 October 2009)	The individual's registration will be checked / verified through the ISA website <u>www.isa-gov.org.uk</u> by CRU / departmental HR.
London Child Protection Procedures for <u>Safer Recruitment</u>	Where the applicant is not currently working with children or vulnerable adults, but has done so in the past, a reference from the relevant employer should additionally be sought.	As per employment history checks for <u>All positions</u>

Events positions

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Positions involved in events attended by dignitaries / high profile personnel, e.g. Remembrancer's department, Mansion House and facilities staff, will require the following additional checks:

Check	Evidence required	Verification / Vetting
Basic Disclosure Scotland	Basic Disclosure certificate (this will be sent by Disclosure Scotland to the employee, who will be required to forward it to the CRU / departmental HR).	CRU / departmental HR will assess whether disclosed unspent convictions impact on the candidate's suitability for the role, in discussion with the recruiting manager.

Security Positions

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Positions with responsibility for monitoring the security of the City of London Corporation buildings, including the policing of entrances / ensuring that visitors are properly checked in and out of buildings. E.g. Security Attendant, Security Officer, Security Scanning Officer, Security Supervisor, require the following additional checks to comply with the British Standard for security.



Check	Evidence required	Verification / Vetting
Ten years' employment history	As per employment history checks for All positions , but covering ten years rather than five.	As per employment history checks for All positions
Sickness records	Information sought in reference requests	
References from all previous employers	As per reference checks for All positions , but for all previous employers, rather than just the last two.	As per reference checks for All positions
Credit reference checks	Information returned by legitimate credit reference company.	CRU / departmental HR will assess whether disclosed information impacts on the candidate's suitability for the role, in discussion with the recruiting manager.
Basic Disclosure Scotland	Basic Disclosure certificate (this will be sent by Disclosure Scotland to the employee, who will be required to forward it to the CRU / departmental HR).	

Positions with unsupervised access to sensitive / secure information [Back to top](#)

E.g. IT / audit roles with unsupervised access to secure systems. Cleaning / maintenance staff with unaccompanied access to areas containing sensitive / secure information.

Check	Evidence required	Verification / Vetting
Basic Disclosure Scotland	Basic Disclosure certificate (this will be sent by Disclosure Scotland to the employee, who will be required to forward it to the CRU / departmental HR).	CRU / departmental HR will assess whether disclosed unspent convictions impact on the candidate's suitability for the role, in discussion with the recruiting manager.

GUIDELINES ON CHECKING EMPLOYMENT SCREENING DOCUMENTS FOR RECRUITING MANAGERS

- 1.** Recruiting managers are required to satisfy themselves that a potential employee is the rightful holder of any of the documents they present to them. These documents should additionally allow the applicant to do the type of work being offered.
- 2.** In line with legal requirements, recruiting managers must carry out the following reasonable steps when checking all of the documents presented to them by the potential employee:
 - check any photographs, where available, to ensure they are consistent with the appearance of the potential employee;
 - check the date of birth listed to ensure it does not place the employee's age at odds with their appearance;
 - check that expiry dates have not passed;
 - Check for any obvious tampering
 - check any United Kingdom Government stamps or endorsements to ensure that the potential employee is eligible to do the type of work being offered;
 - if the potential employee provides two documents containing different names, they should additionally be asked for a document to explain the reason for this. The further document could be a marriage certificate, divorce document, deed poll, adoption certificate or statutory declaration.
- 3.** The recruiting manager must take a photocopy or a scan (using only the Write Once Read Many/WORM software package) of the following parts of proof of identify / right to work in the UK documents presented to them:
 - the front cover and all pages which give the potential employee's personal details. In particular, the page with the photograph and the page which shows his or her signature must be copied; and
 - any page containing a United Kingdom Government stamp or endorsement which allows the potential employee to do the type of work being offered.
- 4.** The recruiting manager must take a copy of every document they have seen so this can be placed on the employees file. By doing this the Immigration Service will be able to establish the organisation's statutory defence from civil liability if it is found that the person is working illegally.
- 5.** Managers should contact the CRU if they require further support with the screening process (e.g. to check if a particular passport or visa proves the individual's right to work in the UK).

EMPLOYMENT SCREENING RISK ASSESSMENT

Reference	Check	Severity of the conflicting information	Risk rating	How does the information relate to the job?	Risk rating	Overall Risk	Proposed Action
1							
2							
3							
4							

- Factors to consider when assessing risks include, but are not limited to:
 - Relevance to the post;
 - The risk to the service;
 - Any cause for concern experienced whilst the employee has been in post;
 - The level of supervision they will receive;
 - The severity of the information;
 - Mitigating circumstances.
- Ideally, a 3 point scale should be used with 1 being a low risk rating and 3 being a high risk rating.
- Once risks have been allocated a risk rating for both the severity of the information and how it relates to the job, the following table should be used to establish the action that should be taken:

How information relates to the job	3	A	R	R
	2	G	A	R
	1	G	G	A
		1	2	3
	Severity & Date of Conviction			

- Red** Withdraw conditional offer of employment
- Amber** Refer to CRU for guidance
- Green** Make unconditional offer of employment

- Further guidance on completing employment screening risk assessments is available from CRU.



WORKERS REGISTRATION SCHEME

1. The Workers Registration Scheme covers immigrants from:

- Czech Republic;
- Estonia
- Hungary
- Latvia
- Lithuania
- Poland
- Slovakia
- Slovenia

[Citizens of Bulgaria and Romania are not covered by this Scheme, see [appendix 5](#) for details].

2. When employing anyone from these countries who is either **new** to working in the UK or has been working in the UK for **less than 12 months** the City of London must ensure that the individual applies for a registration certificate from the Scheme as soon as possible.
3. If they have been working in the UK **continuously for 12 months or longer** (with any number of employers) they no longer have to register under the Scheme.
4. *After they have been working here for more than 12 months, they are advised to obtain an EEA Registration Certificate for identification purposes, however, this is not compulsory and its absence does not affect their right to live, work and enter the UK - it is **NOT** the same as the Workers Registration Scheme certificate.*
5. It is a criminal offence, with fines of up to £5000, for the City of London to employ a worker from one of the relevant countries who has not met the 12 month qualification who:
- has not applied for a Workers Registration Scheme certificate within **one month** of starting work for the organisation; or
 - has not provided the City of London with a copy of their completed Workers Registration Scheme application form.
6. Where an application form indicates that an applicant is from one of the countries covered by the Scheme, it is advisable to verify the dates of their employment with the previous employer(s) within the UK to determine whether the 12 month rule has been met. Where it has not been met, all offers of employment should clearly state that both the offer and the right to continue in post are contingent upon the individual applying for, and obtaining, a Workers Registration Scheme Certificate.



EEA COUNTRIES

The following are classified as EEA Countries:

- Austria
- Belgium
- Bulgaria*
- Cyprus
- Czech Republic
- Denmark
- Estonia
- Finland
- France
- Germany
- Greece
- Hungary
- Iceland
- Ireland
- Italy
- Latvia
- Liechtenstein
- Lithuania
- Luxembourg
- Malta
- Netherlands
- Norway
- Poland
- Portugal
- Romania*
- Slovenia
- Spain
- Sweden
- United Kingdom

* Whilst citizens of Bulgaria and Romania have right of residence in the UK, restrictions currently exist on their right to take up employment. Details on these restrictions can be found on the UK Borders Agency Website: www.ukba.homeoffice.gov.uk.