

New Starter Vetting Policy



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| Owner | Chief People Officer |
| Version Number | 1.0 |
| Primary Audience | All employees |
| Document ID | New starter vetting policy |
| Document Location | MIB Central intranet |
| Objective | |
| This policy sets out the security vetting checks that are undertaken for new starters, and the guidelines for assessing new starter security vetting check results. | |

A. Context

1. Introduction

Business context

MIB is involved in data asset management and on a day-to-day basis many of our employees have access to sensitive personal data. To ensure that we protect this data and maintain the high level of confidence that our stakeholders have in MIB, it is necessary to have a robust vetting and checking process in place.

Some checks must be completed before you can begin working with us. These checks help ensure that we comply with current legislation, and are essential to the integrity of MIB. These include:

- Right to work check
- Financial, address, and identity detail check
- MID check

The following checks do not need to be completed before you begin working with us, but should be completed within your first 3 months of employment with MIB:

- Directorship check
- FCA register check
- Basic DBS check
- Sanctions check
- 2 year history check (for roles up to Grade 10) or;
- 5 year history check (for roles Grade 11 and above)

If satisfactory responses are not received to any of the above, or if information is found which indicates that false or misleading information may have been provided to secure employment with MIB, then MIB reserves the right to take disciplinary action up to and including termination of employment.

New starter security vetting check results will be assessed based on RAG status. What is considered red, amber, or green may vary depending on the area of the business that you have applied to work in. Roles in the following business areas are classed as high risk roles:

- ExCo
- Finance
- People
- Technology and Change (excluding the Change team)

Please be aware that those working in high risk roles will also be required to take part in annual vetting checks. This includes employees who move into a high risk role from another business area. More information about this can be found in our Annual Vetting Policy.

Our aim is to:

- Set out which vetting checks are undertaken for new joiners to the business (employees only)
- Explain how vetting checks are assessed

2. Scope

The new starter vetting process begins when you have formally accepted an offer of employment with MIB. This policy sets out how MIB will assess check results for pre-joiners and employees only. This policy does not form part of your contract of employment, and we reserve the right to amend or withdraw it at any time.

3. Risk appetite alignment

The Board has a clear commitment that employees and prospective employees will be treated fairly, and have no appetite to breach relevant legislation.

B. Policy application and management

1. Roles and responsibilities

All employees are responsible for:

- Responding to queries from our vetting provider in a timely manner
- Providing honest and accurate information throughout the vetting process
- Taking reasonable steps to make your line manager or the People Team aware of any information which may mean that check results will be amber or red, at the earliest opportunity

Managers are responsible for:

- Ensuring all new joiners to their team are aware of this policy
- Making clear that security vetting checks should be completed by the end of the probationary period

- Seeking guidance from the People Team where probation is upcoming and vetting checks have not been completed

The People team is responsible for:

- Providing this policy to all new joiners
- Notifying line managers and new joiners when security vetting is completed
- Making fair and reasonable judgements on vetting check results in line with this policy
- Providing appropriate support to employees, including managers, on the interpretation of this policy

The Executive Committee is responsible for:

- Implementing this policy and ensuring it is followed

The Board is responsible for:

- Ensuring this policy complies with legal and ethical requirements and obligations, and that those working for MIB, in any capacity, comply with it

2. Policy application

RAG Status:

Green = authorised to proceed with employment

Amber = further investigation is required. In order to proceed with employment, approval from the Head of People Operations or in some instances an ExCo member may be required

Red = unable to proceed with employment

Criminal records check

A Disclosure and Barring Service (DBS) check which provides detail on any unspent criminal convictions

All roles:

Green if the following applies:

- You have no unspent criminal convictions

Amber if the following applies:

- You have an unspent criminal conviction(s) that is not considered to be a serious criminal offence and does not impact the reputation of MIB

Red if any of the following apply:

- You have an unspent criminal conviction(s) that is considered to impact the reputation of MIB and/or is considered a serious criminal offence, for example serious violent crimes, fraud, and serious motoring offences

Directorship check

A search to establish any current or previously held directorships

Low risk roles:

Green if the following applies:

- You have no directorships or disqualified directorships

Amber if any of the following apply:

- You have a current directorship that has no connection with MIB, its stakeholders or suppliers, and there is no conflict of interest
- You have a disqualified directorship that upon further investigation is deemed to be acceptable and not of concern

Red if any of the following apply:

- You have a current directorship that is a conflict of interest with MIB, its stakeholders, or suppliers
- You have a disqualified directorship that upon further investigation is deemed to be unacceptable

High risk roles:

Green if the following applies:

- You have no directorships or disqualified directorships

Amber if the following applies:

- You have a current directorship that has no connection with MIB, its stakeholders or suppliers, and there is no conflict of interest.

Red if any of the following apply:

- You have a current directorship that is a conflict of interest with MIB, its stakeholders, or suppliers
- You have a disqualified directorship

Financial Conduct Authority (FCA) Register check

A check of the FCA register to confirm periods in regulated roles, and any adverse information

All roles:

Green if the following applies:

- No adverse information is found

Amber:

- Not applicable

Red if the following applies:

- Adverse information is found

Financial, address, and identity detail check

A search against public records for detail regarding county court judgements (CCJs), bankruptcies, and voluntary arrangements.

Low risk roles

Green if all the following apply:

- You have no voluntary arrangements on record
- You have no unsatisfied CCJs on record
- You have never been declared bankrupt

Amber if any of the following apply:

- You have unsatisfied CCJs on record but can provide satisfactory evidence of a repayment plan in place, and can produce annual evidence of continued payment until satisfied
- You have taken out a voluntary arrangement
- You have been declared bankrupt

Red if the following applies:

- You have unsatisfied CCJs on record and cannot provide satisfactory evidence of a repayment plan in place

High risk roles:

Green if all the following apply:

- You have no voluntary arrangements on record
- You have no unsatisfied CCJs on record
- You have never been declared bankrupt

Amber if any of the following apply:

- You have unsatisfied CCJs on record below the value of £25,000 but can provide satisfactory evidence of a repayment plan in place, and can produce annual evidence of continued payment until satisfied
- You have taken out a voluntary arrangement
- You have been declared bankrupt

Red if any of the following apply:

- You have unsatisfied CCJs on record below the value of £25,000 and cannot provide satisfactory evidence of a repayment plan in place
- You have unsatisfied CCJs on record at or above the value of £25,000

Motor Insurance Database (MID) check

A check to confirm that your vehicle is on the MID and is appropriately insured

All roles:

Green if any of the following apply:

- Your vehicle is listed on the MID with an appropriate insurance policy
- You do not own or drive a vehicle

Amber if the following applies:

- Your vehicle is listed on the MID but the insurance details are not as expected. In some instances you may be required to provide evidence of your insurance policy

Red if any of the following apply:

- Your vehicle is found to be knowingly uninsured and is not SORN
- You have deliberately concealed vehicle registration details from MIB

Right to work check

A check to ensure that you have the right to work in the UK. In cases of time-limited right to work, follow-up checks will be required.

All roles:

Green:

- You can provide satisfactory evidence that shows your right to work in the UK

Amber:

- Not applicable

Red:

- You cannot provide satisfactory evidence that shows your right to work in the UK

Sanctions check

A search for politically exposed persons, sanctions, or restrictions imposed and a global watch list check

All roles:

Green if the following applies:

- No match is found

Amber if the following applies:

- A match is found, however upon further investigation it is deemed that the match is not you

Red if the following applies:

- A match is found, and upon further investigation is deemed to be you

2 or 5 year history check

It is important that you provide your full 2 or 5 year history on your CV and to our vetting provider. References will be obtained to cover a period of 2 or 5 years and may include references from periods of employment, education, or unemployment

All roles:

Green if all of the following apply:

- References align with the information provided on your CV
- Satisfactory references are received

Amber if any of the following apply:

- References do not align with the information provided on your CV
- You have unexplained gaps in the 2 year period
- Unsatisfactory references are received
- References cannot be obtained, but alternative satisfactory evidence can be provided

Red if any of the following apply:

- References cannot be obtained, and alternative satisfactory evidence cannot be provided
- Information is found which indicates that false or misleading information may have been provided to secure employment with MIB

4. Monitoring and reporting

The People team will continue to monitor this policy on an annual basis.

5. Breach reporting

Any breach of this policy must be escalated immediately on detection to the People team.

Serious breaches of this policy and associated procedures may constitute gross misconduct and could potentially result in dismissal.

D. Documentation management

Contact points for queries or guidance :

| Name | Contact details |
|--|----------------------|
| Nicola Griffith – People Operations Lead | ngriffith@mib.org.uk |
| Steve Biggs – Head of People Operations | sbiggs@mib.org.uk |

Review and approval

| 1. Sign off | | |
|--|----------|----------|
| Steve Biggs | May 2024 | Approved |
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| Next review date | | |
| All policies should be reviewed at least annually or when significant change occurs to the policy subject matter or to the business. | | |
| The next review date for this policy is May 2025 . | | |

Version control/history

| Version no. | Author | Effective date | Status/comments (include version status, i.e. draft or approved version) |
|-------------|-----------------|----------------|---|
| 0.1 | Nicola Griffith | N/A | DRAFT |
| 1.0 | Nicola Griffith | 23 May 2024 | Final Version |