



**RECRUITMENT & SELECTION
POLICY AND PROCEDURE**

JUNE 2024

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1. PURPOSE

- 1.1 The Company recognises the critical importance of effective recruitment and selection processes in ensuring that the best candidates are appointed. Making successful recruitment and selection decisions will have a positive impact upon the overall performance of the organisation and the achievement of our strategic goals.
- 1.2 This policy sets out the Company's overall approach to recruitment and selection and should be read in conjunction with other relevant sources of information contained in the People Team pages on [Lighthouse](#).

2. SCOPE

- 2.1 This is a group level policy that applies to all employees of the subsidiary companies of Anglian Water Group Limited, with the exception of Celtic Anglian Water Limited, Alpheus Environmental Limited and Wave Limited (and their respective subsidiaries).

3. STATUS

- 3.1 This policy and procedure is subject to regular review by the Company and is updated as appropriate.

4. POLICY OWNER

- 4.1 Head of Workforce Demand and Resourcing.

5. POLICY

- 5.1 The Company is committed to providing equal opportunities to all persons without discrimination and to the development of efficient recruitment and selection practices which, in accordance with the Equality Act 2010, do not discriminate on the grounds of age, disability, race, religion or belief, sex, sexual orientation, gender reassignment, marriage / civil partnerships, pregnancy and maternity.
- 5.2 It is Company policy that Line Managers are responsible for recruitment, with support from the Recruitment Team.
- 5.3 The Company aims at all times to recruit the person who is most suited to a particular job. Recruitment will be solely on the basis of the applicant's abilities and individual merits as measured against the criteria for the job. Qualifications, experience and skills will be assessed at the level that is relevant to the job.
- 5.4 It is Company policy that:

- Employees and external candidates applying for vacant positions must declare a close personal relationship to the Hiring Manager. No candidate will suffer a disproportionate impact for declaring a close personal relationship.
- Hiring Managers must not promote, shortlist, interview or appoint candidates (internal or external) with whom they have a close personal relationship, i.e. Hiring Managers are expected to remove themselves from the recruitment process in these circumstances.

Please see the Company's Personal Relationships at Work [Policy](#).

- 5.5 Recruitment activity will commence once the Recruitment Team has received a fully authorised requisition that is both submitted and authorised via Workday. All new and replacement roles and those in addition to headcount require appropriate senior manager and People Team approval.
- 5.6 The Company has obtained a license to sponsor international candidates on a skilled worker visa. The Recruitment Team will notify Hiring Managers if any of their candidates require sponsorship and will discuss the specific details at the time of recruitment. Any questions prior to hiring should be raised with the [Recruitment Team](#). Please note that for sponsored candidates there may be specific visa restrictions, which may impact subsequent internal movement.
- 5.7 Apointments to the Board are managed by the Nomination Committee (see [Appendix 3](#))

6. PROCEDURE – STEP 1: Decision to Recruit

6.1 When to Recruit

- 6.1.1 In normal circumstances recruitment will take place when a vacancy occurs or the need for temporary cover arises. Reasons to recruit may include, but are not limited to, the following events:
- an employee leaves an existing position;
 - an employee takes maternity leave;
 - an employee is absent for an extended period;
 - an employee's working arrangements change, e.g. reduced hours; or
 - a new position is established.

All of the above are subject to the appropriate authorisation.

- 6.1.2 Recruitment will not be regarded as an automatic response in the event of these circumstances. The Hiring Manager should take the opportunity to review current work practices and the design of the position prior to making a decision to recruit. The relevant HR Business Partner (HRBP) can assist with this review.

6.2 Types of Resource

- 6.2.1 When considering the process of recruiting to a position, the Hiring Manager should consider carefully the type of resource required. A number of options exist including, a permanent or fixed term contract, an agency worker or, in exceptional cases, a contractor or consultant. Hiring Managers should be aware of the potential implications of using the different types of resource, including contractual obligations.
- 6.2.2 Further advice and guidance on this matter can be sought from the relevant HRBP or the Recruitment Team. Details of the areas covered by each HRBP can be accessed [here](#).
- 6.2.3 In particular, Hiring Managers should consult their HRBP or the Recruitment Team **before** engaging any contractor or consultant (other than under our existing framework agreements and where our supplier / partner has confirmed that the individuals being provided are employed by them). From April 2021 where an individual is provided through an "intermediary" such as a personal services company, depending on the nature of the work they do and how they get paid, they may be considered to be an employee for tax and NI purposes. An assessment of their employment status should be carried out prior to any commitment to using that contractor / consultant. If the Company fails to make the required deductions, it can be fined by HMRC. It is the responsibility of all Hiring Managers to ensure that appropriate checks are made prior to engaging any contractors / consultants to ensure that the Company is not exposed to additional costs / liabilities. Failure to do so could result in the disciplinary process being followed
- 6.3 Flexible Working Arrangements
- 6.3.1 In addition to giving consideration to the type of resource needed, the Hiring Manager should also consider whether the position to be advertised could be undertaken on a flexible basis. Allowing for greater flexibility in the way a position can be filled may have a positive impact on the quality of candidates it is possible to attract. Options might include part-time or flexible working arrangements, or a change to the location of the role.
- 6.3.2 For further guidance on considering flexible options please see the Flexible Working Policy and Procedure, which is available on [Lighthouse](#).
- 6.4 Temporary Labour
- 6.4.1 All temporary labour requirements must be processed and approved using the on-line recruitment system. Normally, any labour requirements for less than 12 weeks will be filled using an agency worker from the Preferred Supplier list. Any requirements over 12 weeks and up to 12 months will be filled either as a Secondment or a fixed term opportunity.

- 6.4.2 All Agency Workers must be interviewed prior to starting work. If the role the Agency Worker is occupying has approval to become a fixed term contract or permanent working directly for the Company, it must be advertised first for one week internally and then suitable candidates interviewed before an offer is made. Where an Agency Worker is appointed to a fixed term or permanent contract, all pre-employment checks will be undertaken, which may take up to 4 weeks to process.
- 6.4.3 On the rare occasion where a Consultant is required, the same process and approvals are required using the Company's on-line recruitment system. Please also see section 6.2.3 above as there may be additional tax and national insurance liabilities that need to be considered.
- 6.4.4 When an assignment is nearing its end date, the Recruitment Team must be informed whether the assignment is ending or being extended. If the assignment is being extended the correct approvals are required.

6.5 Fixed Term Contracts

6.5.1 *Legislation*

Fixed-term employees have the same statutory employment rights as permanent employees.

To comply with the legislation, the Company should offer fixed term contracts where the need for a particular job to be done is temporary. Normally, fixed-term contracts should be offered where:

- it is known in advance that a particular job will come to an end on a specific date;
- the employment is for the purpose of completing a particular task;
- the employment is for the purpose of replacing an employee who is to be absent from work for a period of time (e.g. on maternity leave); or
- the post is dependent on external funding and it is thought likely that the funding will be available for only a temporary period of time.

6.5.2 *Timescales and Employment Rights*

A fixed term contract should finish before it reaches a full 2-year term. This period should include the notice period. Where a fixed term employee has two years' continuous service and their contract is terminated, they may be entitled to statutory redundancy pay.

6.5.3 *Permanent Transfer*

To comply with legislation, the Company must give a fixed term employee, who has had successive fixed term contracts for a period of four years, permanent status automatically from the date that they reach four years' continuous service.

6.5.4 *Process*

Payroll/Systems will monitor start dates/end dates and will flag where notice should be given, where a redundancy payment might be due and where an employee needs to be given automatic permanent status. A letter giving notice should be issued and the fixed term contract has to be terminated by People Support. It is the responsibility of the hiring manager to communicate the changes to payroll.

7. PROCEDURE – STEP 2: Job Description

- 7.1 A current job description, for a role is required in order to advertise a position; the Recruitment Team will use this to formulate the advert for a vacancy.
- 7.2 This means that for new and substantially changed roles, a job evaluation exercise **must** be undertaken before a vacancy can be advertised. Advice and guidance on preparing a job description and the Job Evaluation Process is available from the relevant HRBP.

8. PROCEDURE – STEP 3: Advertising

- 8.1 The choice of advertising approach should take into account its relevance to the role being advertised, overall cost, and the impact of any previous advertising activity. The Recruitment Team will be able to advise on the most appropriate method, and potential sources of suitable candidates, including the possible availability of candidates within the organisation. It is important to remember that the Hiring Manager and their team are likely to have a good network in which to publicise the opportunity. It is good practice to plan recruitment timescales with the allocated member of the Recruitment Team at the start of the process and, where possible, include the interview date in the advert. This helps candidates to manage their diaries.
- 8.2 All adverts will give sufficiently clear and accurate information to enable potential applicants to assess their own suitability for the role.
- 8.3 Employees who are identified as requiring redeployment (see [Redeployment Process](#)) within the Company, for whatever reason, may be considered for roles before they are advertised.
- 8.4 Where an employee is in a permanent or Secondment role and has been identified as part of the succession planning/talent management process or possesses scarce skills that are not otherwise available, they can be slotted directly into a different permanent role without the need to advertise. This must be agreed by the relevant HRBP.

8.5 For all roles, if a Secondment becomes a permanent role, there is no requirement to advertise this role if the employee who occupied the Secondment was previously interviewed and the role was advertised initially. This must be agreed by the relevant HRBP.

[Appendix 1](#) provides a summary of when posts should be advertised.

8.6 Internal Recruitment

8.6.1 Normally, permanent vacancies will be advertised for a minimum of 1 week. This is to provide internal candidates with an opportunity to progress their career within the Company.

8.6.2 Internal vacancies are open to applications from both current employees, alliance partners and agency workers who are working with us at the time of advertisement. NB: An agency worker can apply for an internally advertised role from their start date.

8.7 External Recruitment

8.7.1 In addition to being advertised internally, some roles will be advertised externally.

8.7.2 As a minimum, all vacancies advertised externally will be placed on our Careers website, usually for 2 weeks. Further external advertising, such as the use of jobs boards, media and social media advertising will be subject to agreement between the Hiring Manager and the Recruitment Team.

8.7.3 In certain circumstances it may be appropriate to engage a third party, such as a recruitment agency, in the recruitment process. The Recruitment Team will be able to advise on the most appropriate provider and potential costs. The Company operates a Preferred Supplier List (PSL) and only organisations on the recruitment PSL should be used in the first instance. Organisations not on the PSL may be used in exceptional circumstances only and will be subject to approval by the Recruitment Team Manager.

8.8 Recruitment Budget

8.8.1 The Recruitment Team hold a central recruitment budget for permanent recruitment services, e.g. the use of external advertising and recruitment agencies.

8.8.2 Costs incurred for the recruitment of fixed term contracts, agency workers (including temporary to permanent appointments), search firms and consultants will be met by local budgets.

9. PROCEDURE – Step 4: Applications & Selection Process

9.1 Applications

- 9.1.1 All candidates are required to apply on-line. Additional screening and application questions can be asked of any candidates to help with the selection process. Further guidance on which questions to ask can be sought from the Recruitment Team.
- 9.1.2 Applications received after the closing date will be considered in exceptional circumstances only and only with the agreement of the Hiring Manager and Recruitment Team.
- 9.1.3 Internal candidates are encouraged to discuss their wish to apply for another role with their current line manager before doing so. If applying for a Secondment opportunity, employees **must** discuss this with their Line Manager before applying.

9.2 Long-Listing

- 9.2.1 Usually, an initial sift of applications will be conducted by the Recruitment Team and a long list presented to the Hiring Manager. Normally, this will happen as applications are received and/or shortly after the closing date of the advert.

9.3 Short-listing

- 9.3.1 In all cases, a structured short-listing process will be completed by the Hiring Manager. Candidates will be shortlisted fairly against a set of pre-determined criteria from the job description and cannot be excluded from the short-list on the grounds of age, disability, race, religion or belief, sex, sexual orientation, gender reassignment, marriage/civil partnerships, pregnancy or maternity.
- 9.3.2 It is advisable to consider two elements when shortlisting - essential and desirable criteria. These should be defined within the job description and help to provide consistency and fairness through the process.

9.4 Online Testing and Assessment

- 9.4.1 In certain circumstances, online tests may be used to support the selection process. All tests will be non-discriminatory and appropriate to the requirements of the position.
- 9.4.2 During the selection process, other forms of assessment may be used including presentations, in-tray exercises, report writing and ability tests (this could include numerical and verbal tests). Candidates should be

advised of the use of such methods in advance and must be informed clearly what is expected of them.

9.4.3 Further advice on the types of tests available or appropriateness of assessment is available from the relevant HRBP or the Recruitment Team.

9.5 Psychometric Questionnaires (Personality Profiling)

9.5.1 The Company may use psychometric questionnaires as part of the selection process. These are used in addition to other assessment methods as they provide additional relevant information. Only trained individuals who hold relevant qualifications may select, use and interpret psychometric profiles.

9.5.2 Further advice on the types of questionnaires available and where these are appropriate to use, is available from the relevant HRBP or the Recruitment Team.

9.6 Interviews

9.6.1 Once the short-listing process has been completed, selected candidates will be invited to attend an interview. The interview date should be set to allow candidates reasonable notice (5 working days is good practice) to prepare for their interview. The Recruitment Team will arrange interviews directly with applicants. The Recruitment Team must be given a minimum of 2 working days' notice to arrange interviews. It is important that the Recruitment Team is involved at this stage to ensure any necessary reasonable adjustments can be made.

9.6.2 Interviews should be conducted by a panel consisting of no less than two people. It is important that the interview panel has some level of interview training. As a minimum standard, the interview panel must make sure that they have completed the online interview skills training on Workday prior to holding interviews. Ideally, at least one member of the interview panel should have attended the full interview skills training in the last 3 years. This training can be booked through Workday. When forming the panel, Hiring Managers must ensure that no close personal relationships exist between any panel member and the candidates being interviewed.

9.6.3 When interviewing for senior manager roles, one member of the panel should be an HRBP or Recruitment Team. Other panel members, such as a key internal customer, maybe relevant depending upon the role.

9.6.4 In all cases, a set of questions should be asked that clearly link to the skills, behaviours and technical expertise required for the role. Each question will be scored objectively based on the evidence supplied by the candidate at interview.

9.6.5 The Recruitment Team will provide guidance on suggested questions and an interview template to the Hiring Manager before each set of interviews.

9.7 Making an Offer

9.7.1 Verbal offers are implied contracts and are legally binding once made. Therefore, it is vital that this part of the process is handled correctly. It should be agreed with the Recruitment Team on a role by role basis who is best placed to make the offer. Verbal offers should not be made until all approvals have been obtained.

9.7.2 A verbal offer will be followed by a written contract generated by the People Support Team. Due to the time it can take to complete the pre-employment check process, start dates of less than 20 working days from the point of submitting an offer request to Recruitment should not be promised to external candidates. Normally, this requirement should not impact new starters, who in the most part, are required to serve a minimum 4 week notice period with their current employers.

9.7.3 Re-engagement of employees who have previously worked for the Company requires authorisation from the relevant HRBP. Details of the areas covered by each HRBP can be accessed [here](#).

9.8 Pre-employment Checks

9.8.1 As our water network is part of the UK's critical national infrastructure, it is vital that we do everything possible to check the trustworthiness and integrity of prospective employees. Therefore, the Company makes all offers of employment subject to the satisfactory completion of a number of pre-employment checks that must be completed **prior** to an employee starting in the business. These checks take approximately 3 weeks to complete and start dates should take this into consideration. If candidates do not pass the required checks, a risk assessment is undertaken that could result in the offer of employment being withdrawn. These checks include but are not restricted to the following:

- **Eligibility to Work in the UK**

All external and internal candidates must be able to provide documentation, during the interview process, demonstrating their Right to Work in the UK. Candidates are asked to bring the relevant documentation with them to their interview. Hiring Managers are required to use the checklist contained on the interview guidance provided to ensure that they are checking and copying the documents in line with UK Border Agency rules.

All photocopied documents for new starters should be scanned and uploaded to Workday at the time of offer, clearly signed and dated as proof of viewing and verifying the original document. Candidates

cannot start until proof of their Right to Work has been received by the Recruitment Team. Paper documents that are no longer required must be destroyed confidentially, ideally by shredding i.e. those from unsuccessful applicants and those from successful candidates that have been scanned and uploaded to Workday.

Failure to check Right to Work documents for new starters could lead to unlimited fines and reputational damage.

- **References**

All external candidates must provide details of referees covering a minimum of the last three years of employment with a minimum of two previous employers. Where there are gaps in someone's employment history, other checks may be required. The People Support Team will advise where this is applicable.

- **Driving Licences**

All external candidates, or internal candidates moving to a post where they qualify for an annual electronic driving licence check, are expected to complete a driving licence mandate form. Details provided will be validated electronically by a third party in order to demonstrate that the candidate is entitled to drive in the UK and to drive the required category of vehicle.

- **Qualifications & Memberships**

If it is a requirement of the role that a specific qualification or membership is needed, an original certificate and/or proof must be verified by the Hiring Manager at interview or before an offer is made. It is the responsibility of the Hiring Manager to hold copies of these qualifications locally.

- **Health Clearance**

All external candidates, or internal candidates moving to a new post, are expected to complete a health questionnaire. Details provided will be assessed and, depending upon the responses given by the candidate, a member of the Occupational Health team may contact the candidate to further explore any conditions that may affect the individual's ability to perform the role.

- **Drugs and Alcohol Clearance**

External or internal candidates appointed to a post that requires clearance, are expected to carry out a Drugs and Alcohol test. The candidate will be contacted to arrange a mutually convenient time to meet with our third-party provider.

- **Criminal Records Check**

Depending on the nature of the role, candidates may require a criminal records check. This may include roles where there is direct contact

with vulnerable adults or children and young people or it is required as part of a security check based on access to certain sites or information. Details provided will be sent to a third party who will liaise with the Disclosure and Barring Service (DBS) on our behalf. See [Appendix 2](#) for our policy on the recruitment of ex-offenders.

- **Counter Terrorism Check**

Some posts require a Counter Terrorism Check. Candidates are expected to complete an on-line security questionnaire provided by a third party on our behalf. Candidates may be required to start on a different site or not be able to start work until the check has been completed satisfactorily.

- **Other Checks**

Depending on the nature of certain roles, some candidates may be subject to other pre-employment checks, e.g. finance checks. This is determined through a risk-based approach.

9.9 Start Dates

9.9.1 Where an internal candidate is offered a position it is the responsibility of the Hiring Manager to make arrangements with the candidate's current Manager for the transfer of the individual into the new role. Arrangements should take into account operational requirements on both sides. A transfer may be phased and normally, for most roles, should be commensurate with the individual's contractual notice period.

9.9.2 No external candidate will be allowed to start in post without a contract being issued and the relevant pre-employment checks having been completed. Anyone starting without any one of these elements in place is not authorised to work on the Company's premises.

9.9.3 In the case of agency workers, their contract of employment will be with their agency rather than with the Company. Therefore, there is no paperwork to be signed prior to their start date. Line Managers must use the 1st Day checklist supplied by the Recruitment Team to ensure that any relevant paperwork and inductions are completed at the start of their assignment. Once complete, the 1st Day checklist should be held locally by the Line Manager.

9.10 Candidate Feedback

9.10.1 For those external candidates not shortlisted for interview, there is no requirement to offer any feedback. For internal candidates, it is good practice for the Hiring Manager to offer feedback to help employees develop.

9.10.2 Feedback is required only for those candidates who attend an interview and request it. It is not reasonably practicable to provide feedback for all candidates. It should be agreed with the Recruitment Team, on a role by role basis, how best to give feedback. It is highly recommended that feedback to internal candidates is given by the Hiring Manager. Feedback should be given verbally, relate to the skills and behaviours being measured, be constructive and include clear reasons for the decision.

9.10.3 Feedback on any psychometric questionnaires undertaken should must be given by a person qualified in psychometric profiling. Please contact the Recruitment Team who will be able to assist with assigning a person to do this.

10. Secondments

10.1 The Company encourages Secondments (temporary placements in another role for fixed period of time) as a means of providing development opportunities for existing employees and support for its succession planning/talent management process.

10.2 Authorisation

10.2.1 All Secondments must be raised by the Host Manager and authorised via our on-line recruitment system. All Secondments will require approval from an appropriate senior manager.

10.3 Advertising

10.3.1 Where a Secondment is for a duration of 6 months or more, it must be advertised internally for a minimum of 1 week. For a Secondment of less than 6 months, formal advertising is not necessary – details of the opportunity and the skills required can be circulated locally by email. In addition, where a suitable employee has been identified as part of the succession planning/talent management process or possesses scarce skills, they can be slotted directly into a suitable Secondment opportunity without it being advertised. Where a Secondment is not advertised, it must be agreed by the relevant HRBP.

10.4 Eligibility and Permissions to Apply

10.4.1 It is the Company's normal policy that to apply for a Secondment position an applicant should have worked continuously for the Company for at least 12 months and should not be subject to performance or disciplinary action. If a fixed term employee or agency worker applies and is successful they will be offered a fixed term contract.

10.4.2 Employees must discuss their application for a Secondment with their line manager (Home Manager) **before** applying. In exceptional cases of

particular business need, a line manager may decline an employee Secondment request at this stage, providing they have approval from an appropriate senior manager. If the employee fails to discuss their application with their line manager a Secondment request can be declined at a later stage in the recruitment process.

10.4.3 Secondments for personal development should be discussed during an employee's PDR or one to one reviews.

10.5 Interview Process

10.5.1 For all Secondments that are advertised, the formal interview process will be followed.

10.5.2 If the Secondment opportunity is not advertised, interviews are required only where more than one suitable candidate has been identified.

10.6 Notifications

10.6.1 For all Secondment durations, the People Support Team will generate a letter to the employee once the secondment offer has the relevant approval. The letter will outline the Secondment details including job title, location, Host Manager and Secondment end date.

10.7 Terms & Conditions

10.7.1 For the duration of the secondment the employee's contractual terms and conditions will remain unchanged, except for:

- **Pay**
If appropriate, base salary will be increased for the duration of the Secondment. Pre-existing pay protection arrangements will apply for the duration of the Secondment.
- **Annual Leave/Overtime**
Annual leave entitlement and overtime eligibility will be aligned to the role seconded to and will apply for the duration of the Secondment.
- **Allowances**
Any allowances appropriate for the role seconded to will be paid for the duration of the Secondment.
- **Bonus Scheme**
The bonus plan appropriate for the role seconded to will apply for the duration of the Secondment.

Please note: as the employee's contractual terms and conditions remain unchanged during the secondment **no new contract will be provided.**

10.7.2 It is normal policy for the costs of a secondee to be borne by the Host Manager.

10.8 Extending a Secondment

10.8.1 All requests to extend a Secondment beyond the original end date must be authorised by the appropriate senior manager and the HRBP. The employee has the right to decline an extension to their Secondment and return to their substantive position on the originally agreed end date.

10.8.2 Should a Secondment be extended beyond 12 months, it becomes the responsibility of the host business unit to find the secondee a suitable alternative position at the end of the Secondment, unless otherwise agreed.

10.9 Ending a Secondment

10.9.1 A discussion will take place with the employee by the Host Manager to confirm the end date of a secondment. This information will be shared in a timely manner with the Home Manager.

10.9.2 Host Managers should seek advice from their HRBP if it is necessary to end a Secondment early.

11. **RECORDS**

11.1 All paper documentation relating to the recruitment and selection process for unsuccessful candidates must be stored confidentially and destroyed confidentially after a minimum of 6 months.

11.2 Paperwork relating to new hires will be transferred to, and held on, the employee's electronic record in accordance with the Company's Data Retention [Policy](#).

12. **FURTHER ASSISTANCE**

Please contact the Recruitment Team or relevant HRBP for further assistance. Details of the areas covered by each HRBP can be accessed [here](#).

LAST REVIEWED

June 2024

Appendix 1: When do Roles need to be Advertised and Interviews held?

Recruitment scenario	Advertise	Interview	Exclusions
Internal candidate moving from a permanent position to a permanent position	Yes	Yes	Not required where an employee is identified as part of the succession planning/talent management process or possesses scarce skills that are not otherwise available
Internal candidate moving from a Secondment to a permanent position	Yes	Yes	Not required where an employee is identified as part of the succession planning/talent management process or possesses scarce skills that are not otherwise available OR if the employee who occupied the Secondment was previously interviewed and the role was advertised initially
Secondments of less than 6 months	No	No	If a suitable candidate has not been identified, the role should be advertised.
Secondments of more than 6 months	Yes	Yes	Where an employee has been identified as part of the succession planning/talent management process or possesses scarce skills, they can be directly slotted into a suitable Secondment opportunity without it being advertised.
An employee moving from a fixed term contract to a permanent role	No	No	Only required where they are changing roles

<p>Agency worker moving to a fixed term contract or permanent role</p>	<p>Yes</p>	<p>Yes</p>	<p>Not required where role was advertised initially, and agency worker was previously interviewed for the role.</p>
<p>Any external candidate joining on any form of contract</p>	<p>Yes</p>	<p>Yes</p>	<p>No exclusions</p>

Appendix 2: The Recruitment of Ex-Offenders

1. Introduction

- 1.1 The Company is committed to equality of opportunity for all job applicants and aims to select people for employment (paid or unpaid) on the basis of their individual skills, abilities, experience, knowledge and, where appropriate, qualifications and training.
- 1.2 The Company will consider ex-offenders for employment on their individual merits. The Company's approach towards employing ex-offenders differs, however, depending on whether the job is or is not exempt from the provisions of the Rehabilitation of Offenders Act 1974.

2. Rehabilitation of Offenders Act

- 2.1 Under the Rehabilitation of Offenders Act 1974, a conviction becomes "spent" after the elapse of a defined period of time, which in turn depends on the type of conviction and the length of time that has elapsed since it occurred. This allows a job applicant to be treated for most purposes as if his or her conviction had never happened.
- 2.2 Even if asked a direct question about past convictions, a job applicant with a spent conviction is entitled to state that there have been none (s.4(2)(a) of the Rehabilitation of Offenders Act 1974).
- 2.3 Managers who are interviewing may ask questions about convictions in general, provided that they respect the right of applicants to conceal any convictions that are spent.
- 2.4 If a job applicant chooses of his or her own volition to disclose a spent conviction, or if the company chances to find out about it from another source, the company will disregard it when making the decision as to whom to employ. A refusal to employ a "rehabilitated" person on the grounds of a spent conviction is unlawful (s.4(3)(b) of the Rehabilitation of Offenders Act 1974).

3. Jobs covered by the Rehabilitation of Offenders Act 1974

- 3.1 The Company will not refuse automatically to employ a particular individual just because they have a previous criminal conviction.
- 3.2 During job interviews, job applicants will be asked to disclose any unspent convictions, but will not be asked questions about spent convictions, nor will they be expected to disclose any spent convictions.

- 3.3 If an applicant has a conviction that is not spent and if the nature of the offence is relevant to the job for which he/she has applied, the Company will review the individual circumstances of the case and may, at its discretion, decline to select the individual for employment.

4. Jobs that are exempt from the Rehabilitation of Offenders Act 1974

- 4.1 If the job into which the Company is seeking to recruit is one of the excluded jobs listed in the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 or the Rehabilitation of Offenders Act 1974 (Exclusions and Exceptions) (Scotland) Order 2003, the Company will require the applicant to disclose all convictions, whether spent or unspent (other than where protected cautions and protected convictions do not need to be disclosed, depending on the job concerned). Even in these circumstances, however, the Company will not refuse to employ a particular individual unless the nature of the conviction has some relevance to the job for which the individual has applied.
- 4.2 If the job is exempt, i.e. is one that involves regular, unsupervised access to children, young people or vulnerable adults, the Company, once it has selected the person to whom it wishes to offer employment, will seek documentary evidence about that applicant's criminal convictions and will seek their agreement to make a joint application to the Disclosure and Barring Service (DBS) for a standard, enhanced or enhanced with DBS barred lists check (as appropriate). The Company will reimburse the individual the fee for obtaining the appropriate criminal records certificate. Where the individual is member of the DBS update service, the Company will, with their permission, carry out a status check on any current certificate.
- 4.3 The Company is committed to ensuring that all information provided about an individual's criminal convictions, including any information released in disclosures, is used fairly and stored and handled appropriately and in accordance with the provisions of the General Data Protection Regulations and Data Protection Act 2018. Data held on file about an individual's criminal convictions will be held only as long as it is required for employment purposes and will not be disclosed to any unauthorised person.

5. Objective Assessment Procedure

- 5.1 Information obtained through a disclosure check will be shared with the Hiring Manager, who will be responsible for evaluating the implications of any offences/convictions revealed in accordance with the procedure detailed below.
- 5.2 The Company recognises that an employer's right to request information about previous convictions must be balanced by the right of ex-offenders to equal opportunities in employment. The existence of a criminal record does not automatically debar an individual from employment (paid or unpaid).

- 5.3 Fair and objective judgements will be made about an individual's suitability for employment, based on a comparison of the level of skills, knowledge, qualifications and experience that he/she has in relation to the detailed requirements of the job description and person specification for the post.
- 5.4 The Company makes appointment decisions based on merit and ability. However, the Company expects hiring managers in making an objective assessment to assess the risk and to evaluate all offences/convictions that:
- are declared by candidates on their application form for all posts, i.e. not only those posts exempt from the Rehabilitation of Offenders Act 1974;
 - come to light as the result of a disclosure check; and
 - occur/come to light during employment.
- 5.5 All disclosures, regardless of the seriousness of the offence(s) / conviction(s)/charge(s) revealed, will be subject to an objective assessment. The specifics of the disclosure will be considered in relation to the particular job/situation and take into account:
- **Type of Offence/Sentence Given**

Managers will establish the nature and seriousness of the offence(s). The type of sentence given will often indicate this. If there appears to be a discrepancy in the offence(s) and punishment(s) given, e.g. a £10 fine for an act of indecency, this information will be verified with the individual and/or the DBS if the information has come from a disclosure check. The type of offence may automatically debar an individual from work with children/young people/vulnerable adults.
 - **Nature of the Job/Situation**

Managers will consider the nature/seriousness of the offence(s) in relation to the particular post. For example:

 - If the post involves working with children and young people/vulnerable adults, applicants barred from working with this group will not be appointed (it would be a criminal offence to do so).
 - It is the company's normal policy to consider it a high risk to employ persons, who may have regular contact with children and young people/vulnerable adults, if they have been convicted or charged at any time of the following offences against children or adults:
 - serious drug related offences;
 - robbery/burglary/theft; and/or
 - deception/fraud.
 - It is the company's normal policy to consider it a high risk to employ persons who may have access to money or have budget responsibility (including monitoring) who have been convicted of:
 - robbery/burglary/theft; or
 - deception/fraud.
 - In determining 'risk' managers will consider the level of independence afforded to the postholder. A person who works alone

with minimal supervision will be considered a greater risk than one who works in a group and/or is closely supervised.

- The potential risk posed to other employees will be assessed.

- **Date of Offence(s)**

The Company recognises that offences that took place many years ago may have less relevance than recent offences. As a general rule, a pattern of unrelated or similar offences over a period of time will be considered more serious than an isolated, minor conviction.

- **Mitigating Circumstances**

Managers will ask individuals about offence(s)/convictions so that the context can be considered. Particular circumstances, that no longer apply, may have influenced the offence(s) at that time, e.g. the person was young and experiencing domestic, personal, financial or other problems that have now been resolved.

- **Attitude of the Person**

The attitude of the person will be considered. The Company will look for evidence that the individual has been rehabilitated and has demonstrated a determination not to re-offend. Managers will question an individual's motivation/commitment to work for the Company.

- **Declaration of Offence(s)**

Failure to disclose a criminal conviction that has not yet become, or will never become spent, OR a spent conviction when applying for work with children, young people and vulnerable adults is a disciplinary offence and may be, in some cases a criminal offence.

- 5.6 In reaching a decision the risk of one particular factor alone may be so high as to render the person unsuitable for appointment/employment. Otherwise the risk assessed separately for each factor will be combined and the risk evaluated as a whole.

6. Appointment Decisions

- 6.1 All decisions to appoint an individual with unspent (and spent convictions where appropriately disclosed) will be approved by the Group Head of ER and Business Partnering. The decision to appoint/not appoint is final and there will be no right of internal appeal.

Appendix 3: The Nomination Committee

The Nomination Committee is responsible for reviewing the structure, size, and composition of the Board, including the skills, knowledge, experience, and diversity of its members. The Committee is also responsible for succession planning for Directors and other senior executives (e.g Group Treasurer), taking into account the challenges and opportunities facing the Company, and the skills and expertise needed on the Board in the future.

The Committee is responsible for identifying and nominating candidates to fill Board vacancies as and when they arise. Before any appointment is made by the Board, the Committee evaluates the balance of skills, knowledge, experience, and diversity on the Board, and prepares a description of the role and capabilities required for a particular appointment.

The Committee also makes recommendations to the Board concerning the formulation of plans for succession for both executive and non-executive Directors, and in particular for the key roles of Chairman and Chief Executive.

The Committee is also responsible for making recommendations to the Board concerning the membership of the Audit and Remuneration Committees, and any other Board committees as appropriate.