



**Sentinel Group
Security**

**Security Screening
Procedures**

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Objective

The objective of this procedure is to outline the methods used by the company to make an informed judgement of the BS7858:2019 standards have if applicates meet this requirement for employment to be offered.

1 Responsibility

It is the responsibility of the HR department to ensure this procedure is implemented and maintained at all times. It is the responsibility of the Screening Controller to ensure that screening data is held confidentially and stored securely to prevent unauthorised access and alteration. The whole Operations department must support this process where required.

2 Procedure

1. General

- 1.1. The security screening of employees is imperative to the company to meet the businesses recruitment of personnel for its clients. BS 7858 gives recommendations for the security screening of individuals to be employed in an environment where the security and/or safety of people, goods and services, personal data or property is a requirement of the employing organisations operations and/or where such security screening is in the public and/or corporate interest.
- 1.2. The objective of security screening is to obtain sufficient information to enable the company to make an informed decision on employing an individual in a security environment. The company **must not** employ individuals whose career or 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 breaches of security, which such employment might offer.
- 1.3. The organisation should not employ individuals who, where required, cannot produce a valid work permit, visa or accession state worker registration card within the timescales required by law.
- 1.4. The security screening period should not be less than 5 years; however, the organisation can lengthen this screening period to cater for;
 - Contractual or legislative considerations.
 - Specific industry standards.
 - Some insurers require BS 7858 as part of the policy conditions and may have additional requirements (a longer security screening period e.g. 10 years).
- 1.5. Employees already screened to previous editions of BS: 7858:2019 need not be re-screened, provided evidence of previous security screening can be clearly demonstrated.

- 1.6. Screening to the standard is applied equally to all individuals in relevant employment, including full and part-time, temporary, and permanent, and to all levels of seniority, including Directors.
- 1.7. The full screening procedure should be carried out in the case of individuals regardless of their previous employment, even if that employment was in a security environment.

2. Screening Controller and Screening Officer

- 2.1. **Screening controller** – Is an individual within an organization, responsible for making sure that the security screening process is being carried out correctly.
- 2.2. **Screening officer** – Is an individual within an organization, engaged in security screening or a third-party providing security screening services.

The screening controller(s) and screening officer(s) should be security screened in accordance with the recommendations of this British Standard. An individual should not self-screen.

The screening controller(s) and screening officer(s) should sign a confidentiality agreement, covering both the period of employment and post-employment, relating to the disclosure of the organization's confidential information and/or material with respect to individuals and employee's past, present and future.

The screening controller(s) and screening officer(s) should also be mindful of the difference between personal opinion and fact when recording information about individuals.

3. Confidentiality

- 3.1. The Screening Controller(s) and Screening Officer(s) must sign a confidentiality agreement covering both the period of employment and post-employment, relating to disclosure of the organisation's confidential information and or material with respect to any individuals and employees past, present and future.
- 3.2. Details of confidentially arrangements are published within the Employee Handbook.
- 3.3. Details and information regarding the Data Protection Act are contained within the Company's Policies.

4. Training, Qualification and Experience

- 4.1. Personnel engaged in interviewing and security screening are to be trained in the duties commensurate with the role. Training should fully cover the recommendations given in BS 7858, the essential elements of the Data Protection Act and awareness of the SIA Licensing requirements and include an explanation of security requirements and their ongoing nature.
- 4.2. Employees involved in the screening of security staff should have attended a certificated screening course.

5. Administration of Documents

- 5.1. The screening controller should ensure that screening data is held confidentially and stored securely to prevent unauthorized access and alteration.

The company **must** maintain the following in electronic or paper format:

- A separate file for each individual subjected to security screening. The files of all individuals currently employed but still subject to completion of screening should be identified separately from other employee files; and
- verification progress sheets

6. Conditional Employment

- 6.1. The company must not make an offer of conditional employment unless:
 - The level of risk in the intended employment has been considered and is acceptable;
 - Preliminary checks have been completed satisfactorily; and
 - Limited security screening has been completed satisfactorily. Conditional employment should end if full security screening is not completed satisfactorily within the time period allowed.
- 6.2. The records of those still under conditional employment are prominently marked with the date on which conditional employment commenced and the date of when this conditional employment is to cease, screening having not been completed within 12 or 16 weeks after the date of commencement (dependant on the security screening period).

7. Interview

- 7.1. The interview is a crucial element of the screening procedure. This will allow access to the information provided by the applicant. This information can then be validated to ascertain that all documents are in their original state and not been tampered. Equipment can be used to support this process; the use of ultraviolet scanner is one example. Individuals applying for a vacant position therefore will have an interview prior to any offer of employment being made.

- 7.2. The individual being interviewed must be informed if they are successful in this process, they will be security screened. The applicant should give written permission to the company who will then be authorised to obtain information in accordance with relevant legislation. This process includes details about their background history, criminality checks and that the company will conduct relevant searches of public record information. A reminder will also be noted within the application form and relevant signatures and permission sought prior to any checks being conducted.
- 7.3. Supporting documents provided by the applicant should be photographic and visual inspection of the documents should compare details against the individual physically present.

8. Authorisations

- 8.1. Information is gathered to facilitate security screening in accordance with BS 7858 and in order to determine whether individuals are suitable to be employed in a security environment, and this is to be clearly stated on the security screening form / application form.

The security screening form should state that information is gathered to facilitate security screening in accordance with BS 7858, in order to determine whether individuals are suitable to be employed in a security environment. The organization should make the individual aware at their interview or application, whichever is appropriate, that, with the individual's written permission, the organization is authorized to obtain the following in accordance with relevant legislation:

- Background career/history checks. If permission to contact a current employer is withheld until an offer of employment is made, the individual should be informed that a condition of the offer of employment is that the offer can be withdrawn if the security screening is not concluded satisfactorily.
- The period of current employment should initially be verified by a personal reference and/or documents which substantiate employment;
- A search of public record information. e.g., County Court Judgments, bankruptcies, financial sanctions and proof of identity and proof of address; and criminality check:
 - Authorisation may be in the form of either a wet signature or electronic confirmation.
 - A wet signature is defined as the “original signature written on a piece of paper”, as opposed to a fax copy or an agreement offered orally or electronically.

9. Information Required

9.1. The company should request and be provided with the following information at the relevant point within the screening process.

The individual's personal details including:

- Full name, including forename(s) and surname/family name(s);
- Other and/or previous forename(s) and surname/family name(s) used during the security screening period;
- Aliases, i.e. any name(s) used in addition to current or previous name(s) during the security screening period;
- Full address history, including "from" and "to" dates, for the past five years;
- National Insurance number;
- Evidence of right to work in the UK 2);
- SIA licence number and expiry date (if held).
- Details of the individual's education, employment, periods of Contractual or legislative considerations; and/or Specific industry standards.
- Details of all cautions or convictions for criminal offences, including motoring offences and pending actions, subject to the provisions of the Rehabilitation of Offenders Act 1974 [6].
- Details of all bankruptcy proceedings and court judgments (including satisfied), financial judgments in the civil court made against the individual and individual voluntary arrangements with creditors from the previous six years.
- An acknowledgement that misrepresentation, or failure to disclose material facts, either during application or throughout employment may constitute grounds for withdrawal of an employment offer or termination of employment and/or legal action.
- The security screening period may be extended to account for contractual or legislative considerations and or specific industry standards.
- A declaration signed by the individual which acknowledges that employment is subject to satisfactory screening, that the individual consents to being screened and will provide information as required, that information provided is correct, and that any false statements or omissions could lead to termination of employment.

10. Preliminary Checks

10.1. As a minimum, preliminary checks include;

- Establishment of a screening file
- All information requested has been supplied through a fully completed application form and a full review of the information provided to confirm that the individual is likely to complete security screening;

- Wherever possible, the supporting documentation should be photographic i.e. passport or photo identification drivers' licence. Verification should include visual inspection of original documents and retention of a copy. The visual inspection should compare details within the document against the physically present individual and a check for signs of tampering or alteration.
- The company must also carry out verification checks according to the following circumstances: The Individual is holding a valid and current SIA licence <http://www.sia.homeoffice.gov.uk/Pages/licensing-id-checklist.aspx>

11. Individuals Holding a Valid and Current SIA License

11.1. The company requires seeing the original licence and which should be verified against the public register of licence holders. Cross-checking against other information provided by the individual is required. A copy of the public register search should be retained in the screening file.

12. Individuals Not Holding a Valid and Current SIA License

12.1. The company must be able to demonstrate that they have taken necessary steps to confirm the identity of the individual.

13. Official Public Record Information

13.1. Whilst conducting the search the following public record information is to be obtained;

- Confirmation of current address of residence: the documents that should be presented are listed on the SIA website (<http://www.sia.homeoffice.gov.uk/>) and conform to the SIA requirements for licensing.
- Copies of the documents should be retained in the screening file, with details of who examined and copied the original document.
- Any documents presented to establish proof of address of residence should be checked for authenticity.
- The individual's public financial information: the organization should establish these details by direct reference through a credit reference agency or its agent. The organization should include the following official public record information in the search:
- Confirmation that the individual is listed on the electoral roll;
- if not listed on the electoral roll then confirmation that the individual is known at the current address of residence;

- linked postal address for the previous five years should also be searched to ensure no adverse information is listed;
- county court judgments (CCJs) including IVAs;
- bankruptcy orders;
- aliases.

Key point: An individual's public financial information is not a credit check.

Key point: Examples of authentic documents such as an SIA License, passport and visa stamps, can be found on Government department web-sites (SIA Licensing and details of acceptable identity documents, refer to www.sia.homeoffice.gov.uk)

Key point: Attention is drawn to;

- Immigration, Asylum and Nationality Act.
- Accession (Immigration and Worker Registration) Regulations.
- Sections 15-26 of the Immigration (Restrictions on Employment) Order.
- The Immigration (Employment of Adults Subject to Immigration Control) (Maximum Penalty) Order.

Key point: Information relating to the prevention of illegal working can be found on the Home Office UK Border Agency web-site www.ukba.homeoffice.gov.uk

14. Concerns during a Search

14.1. If a concern is noted during a search the individual should be invited to make representation about the concern. The following applies;

- If single or multiple CCJ(s) are in excess of £10,000 (whether satisfied or not) an executive of the organisation, having reviewed the documentation, signs to accept the risk.
- If the individual is bankrupt, an executive of the organisation, having reviewed the documentation, signs to accept the risk.
- If the individual is a Director of another organisation, an executive of the employing organisation, and having reviewed the documentation, signs to accept the risk

15. Conditional Employment

15.1. The company should not make an offer of conditional employment unless:

- the level of risk in the intended employment has been considered and is acceptable;
- preliminary checks have been completed satisfactorily; and
- limited security screening has been completed satisfactorily.

Key Point: Conditional employment ends if full security screening is not completed satisfactorily within the time limit allowed.

16. Limited Security Screening

- In addition to the preliminary checks, the company should obtain the following for each individual being security screened.
- Confirmation of a continuous record of career and history for a minimum period of three years immediately prior to the date of application.

Key Point: The screening file will record;

- The name of the Screening Officer responsible for each oral reference; and
- The name of the Screening Controller that reviewed the file and confirmed that the limited security screening has been completed.

Key Point: Where an individual is offered, conditional employment following limited security screening, but before full security screening is carried out and completed, the terms and conditions of their employment clearly states that confirmed employment is subject to satisfactory completion of full security screening within the period allowed (normally 12 weeks) and that conditional employment will end if full security screening is not completed satisfactorily within the time period allowed.

17. Periods Allowed for Completion of Full Security Screening: (Conditional Employment)

- 17.1. Full security screening is to be completed within the following timeframes; for 5-year security screening, not later than 12 weeks after conditional employment has commenced; or for a longer period, not later than 16 weeks after conditional employment has commenced.

18. Extension of Period

- 18.1. Where a case exists for extending the period beyond the 12 or 16 weeks the full screening process may be extended by 4 weeks' subject to evidence that written requests to verify information supplied have been made and subject to approval by an executive.
- 18.2. The decision to extend is to be recorded on the Executive Acceptance of Risk Form, which is to be retained and easily accessible.

Key Point: Where screening has not been completed successfully an individual should not continue in relevant employment after expiry of the period allowed for security screening.

Key Point: 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 re-screened.

19. Completion of Screening (Verification of Information)

19.1. Verification of information should be completed within the period allowed for completion of security screening (12 or 16 weeks, or an extension of that period (of 4 weeks)).

Key Point: No unverified periods greater than 31 days should exist in the security screening period being verified.

19.2. For security screening purposes the organisation will seek verification of the following, with confirmation obtained in writing and copies retained;

- Date of leaving full time education.
- Periods and type of employment.

Key Point: The current employer should not be contacted without the individual's prior written permission

- Reasons for the individual leaving.
- Whether anything is known about the individual that would reflect adversely upon their suitability for the proposed employment; and
- Whether former employers would re-employ the individual.

Key Point: When obtaining references in writing it is important to ensure the validity of the source and where necessary conduct extra checks can be made to verify fax numbers, postal and e-mail addresses etc.

- Periods of registered unemployment.
- Periods of self-employment, nature of business and reason for termination.
- Periods of residence abroad.
- Periods of extended travel abroad (longer than 31 days).
- Career and history record incomplete.
- Statutory declaration.
- SIA License for the appropriate sector

IMPORTANT POINT: Where an individual is to be employed in a position that is likely to bring them into contact with children or vulnerable adults, a higher level of disclosure may be required from the appropriate government body.

20. Statutory Declaration

20.1. When the security screening process cannot demonstrably be completed, a Statutory Declaration made before a solicitor, commissioner for oaths, notary public or justice of the peace by the individual being screened may be used as an alternative.

20.2. A statutory Declaration is only to be used to cover;

- One incomplete period of no more than 6 months in the most recent 5 years of the security screening period; or

- Incomplete period(s) not exceeding a total of 6 months in any 5-year period in the preceding years where screening is undertaken for a period longer than 5 years. Prior approval of the following is required;
- A partner in the organisation; or
- The sole owner of the organisation; or
- A director of the organisation; or
- A senior executive of the organisation duly authorised in writing by one of those above.

21. Review of Screening Process

21.1. The organisation's security screening working practices are regularly reviewed and updated where deemed necessary. Areas of review and working practices include;

- All screening data held in hard copy format is secured in lockable filing cabinets and keys controlled by the Screening Controller.
- All screening data that is held electronically is secured on company computers by password access only, which is managed by the Screening Controller.
- Leavers documents are archived and kept in accordance with the standard and the Data Protection Act.
- Documents that are no longer needed or spoiled documents are securely shredded and disposed of securely.

21.2. The screening controller operates a systematic administrative system, which continually reviews the security screening procedure for each provisional employee throughout the security screening period.

21.3. Records show the date on which provisional employment commenced and is to cease, utilising a verification progress sheet.

21.4. Where persons are subject to work permits, visas etc. a similar systematic administrative system records details of start, renewal and finish dates, where applicable and are to be monitored and recorded.

21.5. Reviews of SIA Licenses, renewal, revocation etc. are to be monitored on a regular basis, and recorded, using the SIA website and or a similar systematic administrative system.

22. Records held after Cessation of Employment

22.1. After cessation of employment, the following records should be maintained for seven years:

- Written provision of information
- A signed statement
- Proof of identity;
- Confirmation of continuous record of career and history including:
- Periods of registered unemployment;

- Records of self-employment;
- Periods of residence abroad;
- Verification progress sheet
- Employment verification and personal references
- Statutory Declaration
- Executive Acceptance of Risk

23. Acquisitions, Transfers and Take-overs

- 23.1. Employees acquired by or through a take-over should be reviewed for compliance to ensure they meet requirements of selection and screening to BS 7858 and BS 7499 sub-section 5.3.2.
- 23.2. If it cannot be established from records that security screening in accordance with BS 7858 has already taken place for any member of staff in relevant employment, then security screening will be undertaken within the screening period, commencing on the date of acquisition or transfer of the business or undertaking.
- 23.3. Any previously unscreened employee who, as a result of the acquisition or transfer, is employed in a position requiring security screening will also be screened in accordance with BS 7858.
- 23.4. Employees acquired through a take-over also are to have training needs identified and addressed with a specific training policy for them.

24. Night-time Working

- 24.1. Where night-time working is involved, prospective employees should be asked to confirm that there is nothing in their circumstances that would be detrimental to their working nightshifts. Night-time workers should be offered the opportunity of a free medical assessment.

25. Drivers

- 25.1. Potential employees whose job involves driving company vehicles will be informed of the requirement to have driving licenses inspected every six months with a copy kept on file of the most up-to-date copy.

26. Ancillary staff

- 26.1. Recommendations within BS 7858 are applied to all ancillary staff who are defined as those “individuals involved in ancillary activities such as administration, personnel, building maintenance and cleaning”.
- 26.2. Where individuals employed within ancillary roles are not security screened in accordance with BS 7858 they are restricted from having access to sensitive information, assets or equipment.

27. Sub-Contractors

- 27.1. Recommendations in BS 7858 apply to all sub-contractors who, through contractual arrangements, are engaged in relevant employment.
- 27.2. Before the organisation allows individuals from a sub-contractor to be engaged in relevant employment the organisation either;
- Ensures the sub-contractor provides evidence that it operates in accordance with the recommendations within BS 7858 and in accordance with the organisations insurance policy or;
 - Carries out full security screening of all relevant contracted personnel.

Evidence can include;

- A fully completed BS 7858 compliant screening file relevant to their current contract.
- Current proof of certification by a UKAS accredited certification body which includes BS 7858 in the scope or an SIA Approved Contractor. In both cases a written statement that the individual(s) being supplied have been screened in accordance with BS 7858.

28. Out-sourced Security Screening

- 28.1. Where any screening services are outsourced the organisation will ensure that the recommendations of BS 7858 are applied.

Zafar Choudhry

Chief Executive Officer
Sentinel Group Security Ltd.

Date: 1st February 2021

Annex A

Identity and Residence / Address Documents: Group A and Group B Documents.

The following groups of documents that prove **identity** and prove the **address / place of residence** are required and are categorised as either Group A or Group B.

When providing evidence, the following documents must be provided;

- Two identity documents from group A. At least one document must show current address and at least one document must show date of birth

Or

- One identity document from group A and two documents from group B. At least one document must show current address and at least one document must show date of birth.

Group A

- **If a UK passport holder**, the passport number entered on the application form. The SIA do not require the submission of the actual passport.
- Signed valid passport of any other nationality.
- Signed valid UK photo driving license (both parts of the full or provisional licence are required)
- UK original birth certificate issued within 12 months of birth
- UK biometric residence permit

Group B

- Valid EU photo ID card.
- Valid UK firearms licence with photo
- Signed valid UK paper driving licence.
- Marriage certificate or Civil Partnership certificate, with translation if not in English.
- UK birth certificate issued more than 12 months after date of birth, but not a photocopy.
- Non-UK birth certificate, with translation if not in English.
- UK adoption certificate
- P45 statement of income for tax purposes on leaving a job issued in the last 12 months.
- P60 annual statement of income for tax purposes issued in the last 12 months.
- Bank or building society statement issued to your current address, less than three months old. You can use more than one statement as long as each is issued by a different bank or building society.
- Mortgage statement issued in the last 12 months.
- Utility bill (gas, electric, telephone, water, satellite, cable) issued to your current address within the last three months. You can only submit one utility bill in support of your application.
- Pension, endowment or ISA statement issued in last 12 months.
- British work permit or visa issued in last 12 months.
- Letter from H.M. Revenue & Customs, Department of Work and Pensions, employment service, or local authority issued within the last three months. You

can submit more than one letter as long as each is issued by a different Government department or a different local authority.

- A credit card statement sent to your current address within the last three months. You can submit more than one statement as long as each is issued by a different issuer.
- Council Tax statement issued in the last 12 months.
- Child benefit book issued in last 12 months.

Annex B

Form 1 – Oral enquiry

1. Employee (applicant)

Surname:

Forename(s):

2. Verifier

Name of organization:

Telephone number:

Telephone number verified:

Name of contact individual:

Dates employed:

– as stated by employee:

* – as confirmed:

* Please comment on the applicant's suitability for the role.
.....
.....

* Do you have any other relevant comments you wish to make regarding the applicant?
.....
.....

Signed: Date:
(Screening administrator)

* Where response indicates that applicant is NOT suitable for proposed employment, bring to immediate attention of screening controller responsible for screening.

Form 4 – Statutory declaration

I [insert full name as shown on your passport]
of
[insert residential address]
holder of Passport No [insert passport number]
Date of birth [insert date of birth]
Do solemnly and sincerely DECLARE as follows:
1) (set out the required information in numbered paragraphs)
2) ...
3) ...
I make this declaration conscientiously believing the same to be true and in accordance with the provisions of the Statutory Declarations Act 1835.
I hereby certify that, to the best of my knowledge, the details I have given above are complete and correct.
I understand that any false statement or omission to the company or its representatives may render me liable to dismissal without notice.
DECLAREDthe day of 20.....,

.....
(signature)
Company Representative:

.....
(signature)