
Vetting & Barring Scheme Policy

POL-040

1. Introduction

John Graham Construction Ltd. (“GRAHAM”) complies fully with the Code of Practice, regarding the correct handling, holding and destroying of Disclosure information, for the purposes of assessing applicants' suitability for employment purposes, voluntary positions, licensing and other relevant purposes. It also complies fully with the Data Protection Act 2018 and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of information and has a written policy on these matters.

We are recognised as a Registered Body, Responsible Body and an Umbrella Body with AccessNI who process criminal record checks on behalf of GRAHAM employees and relevant employees of organisations to whom we sub-contract work.

GRAHAM are committed to being an inclusive workplace where all employees, customers and stakeholders can fully participate and contribute. We strive to ensure accessibility across all facets of our operations, including physical spaces, digital platforms, communication channels and services.

Our People policies are regularly audited against rigorous accessibility standards to ensure compliance and to support every employee.

Anyone who requires additional support or has any questions regarding accessibility can contact the HR team at HR-JGC@graham.co.uk

2. Scope

This procedure applies to all employees of the company who will work in positions covered by the:

Northern Ireland

Safeguarding Vulnerable Groups (NI) Order 2007

Protection of Children and Vulnerable Adults (NI) Order 2003 (POCVA)

Rehabilitation of Offenders (Northern Ireland) Order 1978

Scotland

Protection of Vulnerable Groups (Scotland) Act 2007

The Rehabilitation of Offenders Act 1974

England & Wales

Safeguarding Vulnerable Groups Act 2006

UK

Compliance with BS7858 Code of Practice for Security screening of individuals employed in a security environment.

3. Usage

We use disclosure information only for the purpose for which it has been provided. The information provided by an individual for a position within GRAHAM is not used or disclosed in a manner incompatible with the purpose. We process personal data only with the express consent of the individual. We notify the individual of any non-obvious use of the data, including further disclosure to a third party, identifying the Data Controller, the purpose for the processing, and any further relevant information.

4. Handling

GRAHAM recognises that, under section 124 of the Police Act 1997, it is a criminal offence to disclose Disclosure information to any unauthorised person. We, therefore, only pass Disclosure information to those who are authorised to see it in the course of their duties.

GRAHAM do not disclose information provided under subsections 112 to 115 of the 1997 Act, namely information which is not included in the Disclosure, to the applicant.

5. Access & Storage

We do not normally retain Disclosure information. If, under certain circumstances as outlined in point 6 below, we do have to retain Disclosure information, it is kept securely electronically. Access is strictly controlled to authorised and named individuals, who are entitled to see information in the course of their duties. With employee's permission, the certificate in certain circumstances, may be forwarded to a 3rd party for the purposes of Security Clearance.

We do not keep Disclosure information on an individual's personnel file.

6. Retention & Disposal

AccessNI is an electronic system and only the applicant receives a paper copy of Disclosure information. GRAHAM can request a copy from the applicant, but this is returned to them following analysis by the HR Department.

If, under certain circumstances, a copy of the disclosure is retained, we do not keep it for any longer than is required after recruitment (or any other relevant) decision has been taken. In general, this is no longer than 6 months. This is to allow for the resolution of any disputes or complaints. Disclosure information will only be retained for a longer than this period in exceptional circumstances which justify retention for a longer period. The same conditions relating to secure storage and access will apply during any such period.

7. Renewal

Applications will be renewed as and when required, where relevant regional legislation requires renewal for Basic, Standard, Enhanced and BS7858 Security Screening.

It is the employee's responsibility to notify the Human Resources Manager if there are any changes during the interim period e.g. they have been convicted of a criminal offence at any time during that period. Failure to provide this information may result in disciplinary action.

8. Umbrella Bodies

Before acting as an Umbrella Body (i.e. a body which countersigns applications for Standard or Enhanced Disclosures on behalf of another organization), GRAHAM will

take reasonable steps to ensure that the organisation on whose behalf we are acting will comply with the Code of Practice, and in full accordance with this policy. We will also take all reasonable steps to satisfy ourselves that they will handle, use, store, retain and dispose of Disclosure information in full compliance with the Code of Practice, and in full accordance with this policy. We will also ensure that any Body or individual at whose request applications for Disclosures are countersigned, has such a written policy and, if necessary, will provide a model policy for that Body or individual to use or adapt for this purpose.