

RIGHT TO WORK IN THE UK

Policy and Procedure

Business Scope

Provision of Civil, Electrical and Mechanical Services to the Commercial, Industrial and Public Sectors, within the UK. These services are coordinated through a head office complex and delivered in the field via skilled and trained operators. The laying of Asphalt Mixes by hand and machine in accordance with National Highways Sector Scheme 16.

1. POLICY STATEMENT

- 1.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour, and human trafficking ("**modern slavery**"), all of which include the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.
- 1.2 Northavon Group Limited has a zero-tolerance approach to modern slavery and illegal employment in the UK within its business and supply chains.
- 1.3 This policy applies to all persons:
 - (a) working for the Group, or on our behalf, in any capacity, including employees at all levels, directors, officers and agency workers; and
 - (b) our contractors, external consultants, agencies, third-party representatives, and business partners ("**Suppliers**").
- 1.4 Northavon Group will ensure that all persons employed by the company or applying for employment with the company are legitimately allowed to work in the United Kingdom and Northavon Group will comply with all legislative requirements in this regard as stipulated in the pertinent statutory instruments.
- 1.5 With regard to Northavon Group's supply chain, as part of our contracting process, we include specific prohibitions against modern slavery and illegal employment in the UK and we expect that our Suppliers hold their own suppliers to the same high standards. Northavon Group will ensure that its supply chain partners have Right to Work In the UK policies and procedures which are suitable, sufficient and compliant. Where necessary this will be verified by the Northavon Group Compliance function.

2. PROCEDURE & METHODS

Northavon Group shall ensure that the following procedural aspects are complied with when conducting Right to Work checks:

- 2.1 The amended methods to be used for Right to Work checks are effective from 1 October 2022.
- 2.2 From the above date Northavon Group shall no longer view photographed or scanned copies of Right to Work documents and then confirm later via video calls.
- 2.3 Effective from 1 October 2022 only two types of Right to Work checks shall be undertaken, namely:
 - A digital check via an IDSP (Identity Service Provider) or the Home Office checking service
 - An in person manual check

- 2.4 An IDSP is a certified identification document validation service provider which is able to carry out digital identity checks for individuals not in scope to use the Home Office checking service.
- 2.5 Northavon Group shall only employ the services of an IDSP after checking that the provider is certified by one of the certification bodies accredited by UKAS.
- 2.6 Right to Work checks shall be conducted by Northavon Group Limited in accordance with the detailed procedure attached hereto at page 3.

This policy is reviewed and revised at regular intervals, not less than annually, to ensure that it is relevant, up to date and fit for purpose.

Signed:

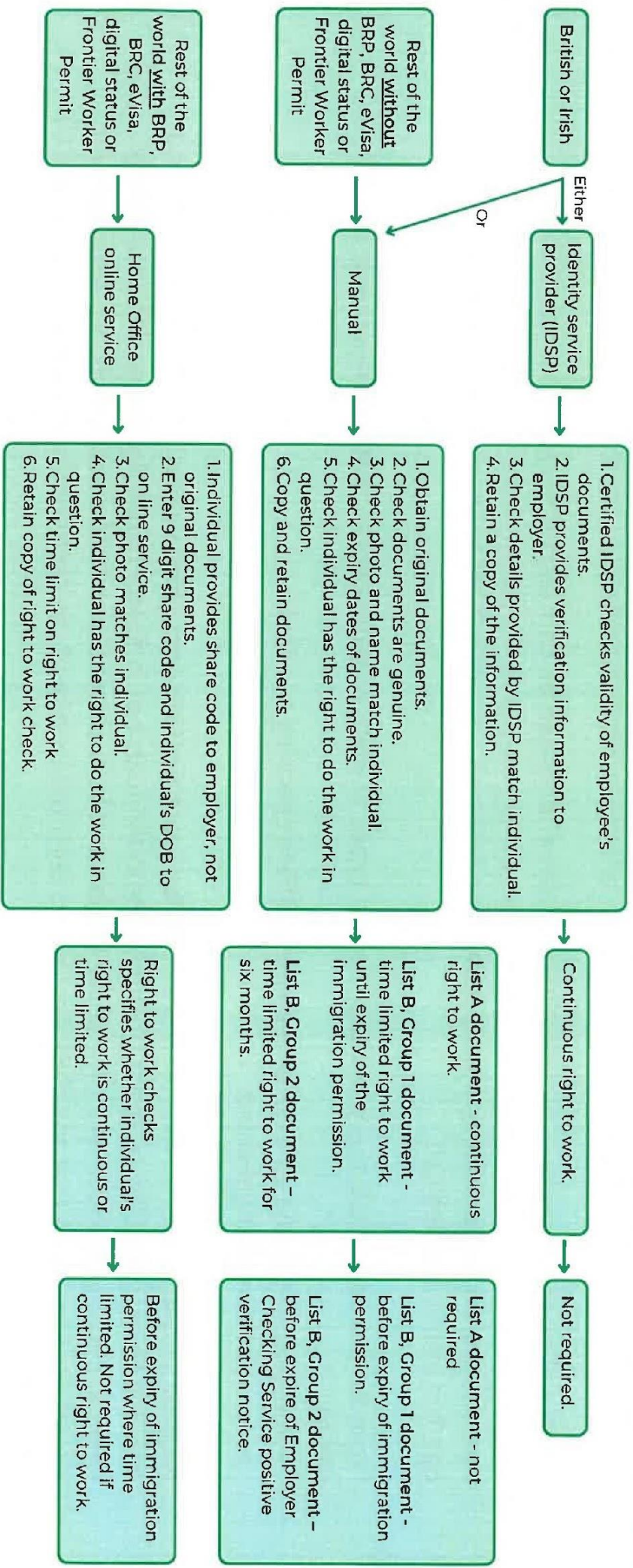
A handwritten signature in black ink, appearing to read 'Mike Clancy', with a stylized, cursive script.

Mike Clancy
Group Managing Director
9 January 2023

How to conduct the UK Right to Work check from 1 October 2022



NATIONALITY TYPE OF CHECK PROCESS RIGHT TO WORK FOLLOW UP CHECK



List A documents include

- Passport (current or expired) showing the holder is British or a citizen of the UK and Colonias with the right of abode in the UK
- Irish passport or passport card
- Valid passport endorsed to show the holder is exempt from immigration control, allowed to stay indefinitely in the UK, has the right of abode in the UK, or has no time limit on their stay in the UK

List B, Group 1 documents include:

- Current passport showing that the holder is allowed to stay in the UK and can do the type of work in question. This includes an endorsement with no work-related conditions attached Any prohibition or restriction on work will be explicitly stated on the endorsement.

List B, Group 2 documents include:

- A Positive Verification Notice (PVN) issued by the Home Office Employer Checking Service to the employer which indicates that the individual can stay in the UK and do the work in question.
- A Home Office document showing the holder made an EU Settlement Scheme (EUSS) application on or before 30 June 2021 together with a PVN.
- A Certificate of Application showing the holder made an EUSS application after 30 June 2021 together with a PVN.
- In Application Registration Card together with a PVN.

The Employer Checking Service (ECS)

If an individual has an outstanding immigration application or appeal and cannot otherwise evidence their status, the employer can ask the Home Office ECS to confirm their right to work. The employer may be liable for criminal sanctions and civil penalties if it employs someone after receiving a Negative Verification Notice from the ECS

Employer Checking Service

Call: 0300 790 6268