

RIGHT TO WORK IN THE UK POLICY

J Coffey Construction Limited (Company Registration No. 29378886) recognises that slavery and human trafficking remains a hidden blight on our global society. The aim of the Company is to ensure operatives and staff who we employ, has the right to work in the UK Under Section 15 of the **Immigration, Asylum and Nationality Act 2006**

From 1 October 2022, employers must carry out one of the prescribed checks before employment commences, as set out in guidance.

These checks are:

1. a manual right to work check
2. a right to work check using IDVT through the services of an identity service provider (IDSP)
3. a Home Office online right to work check

If doing the check in person, we will physically obtain documents from the Home Office's lists of acceptable options, either List A, or List B. The lists are available on the government website.

Manual Check:

The following shall be checked:

1. photographs are consistent with each other across documents and with the person's appearance
2. dates of birth are consistent across documents
3. expiry dates for permission to be in the UK have not passed
4. any work restrictions to determine if they are allowed to do the type of work on offer
5. the documents are genuine, have not been tampered with and belong to the holder
6. the reasons for any difference in names across documents can be explained by providing evidence such as an original marriage certificate, divorce decree absolute, or deed poll (you will need to keep a copy of supporting documents as well).

A copy shall be made of each document in a format which cannot be manually altered.

For passports we will copy any page with the document expiry date, the holder's nationality, date of birth, signature, immigration permission, expiry date, biometric details, photograph and any page containing information indicating the holder has an entitlement to enter or remain in the UK (visa or entry stamp) and undertake the work in question. For all other documents you copy the document in full.

The date of the check will also be recorded.

Digital Checks:

J. Coffey are using a document vetting system provided to us by a company called PPAC in order to determine the proof of right to work of new operatives starting with us.

We currently employ the use of several static set-ups on projects and also a mobile unit for our other sites across London and the Southeast.

Both set-ups consist of the following equipment when operational:

- Specialised document scanner
- PC (encrypted laptop or desktop)
- Camera

To outline the process in general:

1. First the operative provides the original physical copies of his proof to right to work documents in person to the user operating the equipment at present these will be our document controllers.
2. The operatives documents are then scanned into the system using the specialised scanner.
 - a. Documents must be placed face down flat on the glass and flush against the top left-hand corner of the device for an accurate scan to be taken.
 - b. Once correctly placed, three separate images of the document are then taken in quick succession to account for security features not visible with the naked eye:
 - i. Optical
 - ii. Infrared
 - iii. Ultraviolet
 - c. Any integrated electronic chips embedded within the document holding additional information is also read at this point.
 - d. Then entire scanning process taking only a few seconds (<10s at most)
3. The images of the scanned document are then transferred across to the PC where the complementary software provided processes the results.
 - a. The data collected by the scanner is then checked against a database of indexed templates of old and new versions of documents such as, passports, ID cards, visas (including biometric permits), drivers license etc.. issued by the various Government agencies across the globe.
 - b. This process attempts to pair the scanned images by looking at the various visual indicators and security measures present on the scan such as the layout, font, the various serial numbers, UV patterns, embedded fibres, chip data etc... to name but a few.
 - c. Once paired each security feature is graded comparatively against the template. Here the quality of the document is also considered, such as general wear and tear of document over time. For instance, creases, furred edges and erosion of UV layer.
 - i. If the grading is below a predetermined threshold the document passes for that field checked.
 - ii. If the grading breaches the threshold the document fails the test for that particular security feature checked and is flagged as such.
 - d. On average, this process takes between 2-10 seconds at most once the information form the scanner is passed across.
4. If the document checks out ok and the overall result is a pass a face-check using biometrics is then conducted where the image on the document is then paired against a photo taken of the operative at the time by the camera attached.

This confirms if the operative is the same as that represented in the documents photo.

 - a. If the document is electronically chipped containing a photo of the individual to which the document belongs, the face-check compares the operative against this image too.
 - b. The system will then indicate if it believes both images match or do not.
5. If the user has any doubts about the results of the scan a 24hr support service is available where a professional will be on hand to review the scan and provide a second opinion.
6. One a scan is complete, a report is generated, encrypted & password protected and then emailed across to a restricted email account controlled by our HR department for review, confirmation and record keeping.

Conducting any of these checks will provide employers with a statutory excuse which is a defense against a civil penalty.

However, the employer will have a “statutory excuse” (under section 15(3) of the 2006 Act) if it carries out a "Right to Work" check complying with the Immigration (Restrictions on Employment) Order 2007, SI 2007/3290 (as amended).[3]

A right to work check must be performed before the individual starts working for the company, this should be done first thing in the morning when they arrive on day one, before anything else, but it's preferable to do it beforehand. This way we will be satisfied in advance that the individual has the right to work and can proceed with preparations for them starting work.

Home Office Online Right to Work Checks:

The Home Office right to work process requires individuals to have a biometric residence permit number, a biometric residence card number, a passport or national identity card. They will need a UK Visas and Immigration Account and will be able to scan in their identity documents.

It will not be possible to conduct a Home Office online right to work check in all circumstances, as not all individuals will have an immigration status that can be checked online. In circumstances in which an online check is not possible, you should conduct the manual check.

Some individuals have been issued with an eVisa and can only use the online service to prove their right to work. Biometric Residence Card, Biometric Residence Permit and Frontier Worker Permit holders are also only able to evidence their right to work using the Home Office online service.

To conduct an online check, the applicant must provide the company with their date of birth and a share code, which we then enter the government's free online checking service. We will need to satisfy ourselves that the photograph is of the individual in question and will need to retain a copy of the online check securely, either electronically or in hard copy.

Company activities are varied through multiple disciplined areas such as: Structural Alterations, Sub & Superstructure works, Concrete & Builders work packages, Main Contracting and works on Infrastructure.

We are committed to ensuring that there is no known Modern-Day slavery or human trafficking in our supply chains or parts of our business. Our Modern-Day Slavery Policy Statement reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place. To further enhance our commitment and transparency we are 'B' members with SEDEX and have encouraged two of our main suppliers of our supply chain to take up membership as well. As well as our Modern-Day Slavery Policy Statement, other associated policies we employ are our Equal Opportunities, Diversity & Inclusion Policy Statement, Ethical Policy Statement & Industrial Relations Policy Statement.

This Policy takes into account, and supports, the policies, procedures and requirements documented in our Integrated Management System, compliant with the requirements of ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018. The implementation and operation of this management system underlines our commitment to this policy statement. Formal procedures concerning slavery and human trafficking have been established, including disciplinary procedures where they are breached. Additional procedures ensure that this policy is understood and communicated to all levels of the company, and that it is regularly reviewed by the Directors to ensure its continuing suitability and relevance to the company activities.

The Company has achieved these aims by our initiative to identify and mitigate risk in the following ways (but not limited to): -

- Training staff and making them aware of the issues associated with Modern Day Slavery by way of a presentation/company induction and by Toolbox Talks and poster display on site notice boards.
- Cooperation with 2nd Party Modern Day slavery audit.
- More stringent vetting and investigation of our supply chain using comprehensive PQQ's to review compliance to MDS policy statement prior to engagement of service provision.
- Continually auditing & reviewing our practices for checking all employees are paid at least the minimum wage and have the right to work.
- Investment in PPAC right to work software system.
- Maintaining our SEDEX B membership.
- Maintaining our full membership to TISC Report.
- To allow our main clients to audit our business using the SEDEX audit format which we successfully passed.
- Becoming registered with the GLAA and having our logo applied to the GLAA Construction Protocol.
- Reviewing GLAA newsletters.
- The company has not and will not knowingly support or deal with any business involved in slavery or human trafficking.
- We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values.
- Implementing the GLAA initiative 'Hand SOS' to all sites.
- Increased Modern Day Slavery Audits of our suppliers and agencies providing operatives.

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we have provided training to relevant members of staff and all Directors have been briefed on the subject.

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Completion of Audits by Directors, Managers, Safety Managers and Safety Advisors.
- Use of labour monitoring and payroll systems.
- Level of communication and personal contact with next link in the supply chain and their understanding of, and compliance with our expectation.

This policy applies to all employees and other personnel engaged in J Coffey Construction operations:

Signed: *Eddie Barrett* (Original Signed)

Date: 12/01/2024

Eddie Barrett

Group Managing Director

On behalf of J. Coffey Construction