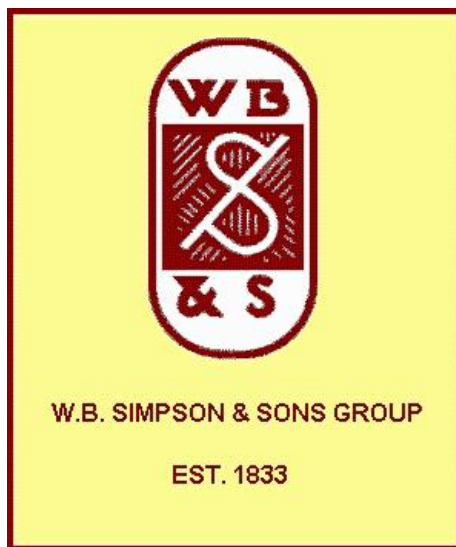

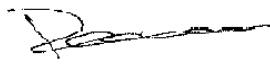







Migrant Worker Employment Policy



Plan drawn up by:	Name:	Terry Clare	Signature:		Date:	28-03-2018
Approved by:	Name	Paul Valler	Signature:		Date:	28-03-2018

Amendments

Date	Version	Summary of changes made:	Changes made by	Approved by
30/04/2014	Original	None	N/A	
30-05-2015	2	None	N/A	
18-04-2016	2	Reviewed.	N/A	
02-05-2017	2	Reviewed.	N/A	
28-03-2018	2	Reviewed	N/A	

Migrant Worker Employment Policy

W. B. Simpson & Sons Ltd is aware of and will comply with the Immigration, Asylum and Nationality Act 2006, and in particular Sections 15-26 which came into force on February 29 2008.

In order to meet this commitment the Company has adopted the following practices

- ALL job applicants and current employees must provide evidence to support their right to work in the UK. (see Documentation section below for guidance)
- Employees with a restrictive document i.e. one that is issued by the Government Border Agency and is limited to a fixed period of time, will be required to provide documentation that supports their right to continue their employment at regular intervals as determined by the document expiry date.
- Documents provided as evidence for the right to work must be original.
- WBS will not allow discrimination to be an obstacle in the recruitment, training or promotion of staff who are otherwise qualified for particular positions. Applicants for positions in the company will be selected, promoted and treated on the basis of their relevant merits and abilities.
- ALL employees will be issued with a job description and contract of employment.
- It is the Company's intention that no individual activities shall hinder the application of this policy. The provisions of this policy will therefore be brought to the attention of its staff, consultants, suppliers and subcontractors.
- To fulfill the commitments made in this statement, information will be sought from applicants for employment, so as to allow the monitoring of equal opportunities to be carried out. Regular audits of the employment process will be undertaken to ensure compliance with the policy.
- Terms and conditions of employment require all individuals who are involved in the employment of staff not to discriminate unfairly. Any allegations of such behaviour, or of racial or sexual harassment, will be investigated thoroughly and disciplinary action will be taken where necessary.

Documentation

Document checks will be made against the criteria identified in the Immigration, Asylum and Nationality Act 2006. Lists A and B. a copy may be viewed at the UK Border Agency website or at WBS offices.

A British citizen may demonstrate their eligibility to work by providing either current UK passport as a single document, or a combination of the following documents as specified in List A:

- A document issued by a Government Agency or a previous employer containing their permanent National Insurance (NI) number and their name, such as a P45, P60, or National Insurance number card, and
- A full birth certificate
- A full UK adoption certificate
- A certificate of registration as a British Citizen, or
- A certificate of naturalisation as a British Citizen

Documents provided as evidence for eligibility to work in the UK must be original and copies must be taken at the time of production and the photocopy verified by a manager of the company as being authentic and photographic evidence endorsed as to the likeness of the person.

Original documents must be returned to the prospective employee/employee immediately after copying.

Documents must be securely retained for the duration of an individual's employment and for a further three years after leaving the company.

Part 2 of the P45 must also be kept for at least three years after the end of the current tax year in order to comply with HMRC regulations.

Responsibilities for ongoing checks.

- We have an on-going responsibility to check documentation in List B for staff at least once every 12 months:
- WBS is responsible for on-going checks for all permanent and fixed-term members of staff.

- If the member of staff's / sub contractor's leave to remain expires sooner than 12 months from the last review date, WBS staff employing the worker/s must ensure that they check immigration status prior to the leave expiring. If the member of staff does not make a valid application for leave to remain prior to the expiry, she or he will automatically become an over-stayer. As a result of this, if the individual continues in employment WBS could be liable for a civil penalty and/or criminal liability.
- Please note that non-compliance with this Procedure may be a disciplinary offence.

Prospective Employees

If a person cannot provide evidence from either Lists A or B the offer of employment may be withdrawn if the post needs to be filled urgently. However, if the post is not required as an immediate start then the prospective employee may be given time to produce such evidence as to satisfy the requirements of Lists A or B

Site Work

Sub Contract (Labour Only) Workers

All sub-contract (labour only) workers must be registered for tax purposes with HMRC and have a current National Insurance number before being considered for work contracts with the company.

Site Working

All employees or contractors representing WBS should have a basic understanding of the English language. Where this is not the case, there must be a co-worker who can interpret and be available at all times whilst on any construction site. There should be no more than four Non English speaking employees to one interpreter employee.

Employees/contractors must pass an appropriate health and safety test and hold a current CSCS card

Training and Communication

The company will provide training and information for employees to ensure they understand their position in law, the policies and procedures of the company in respect of equal opportunities and their responsibilities under this policy.

All employees/sub contractors must undertake training as in Section 47 of Health and Safety Policy and Procedures document.

Sub contractors employed by WBS will be briefed on, and expected to act in accordance with these policies and procedures.

Grievance and Disciplinary

Grievances under this policy will usually be dealt with through the normal grievance procedure.

Monitoring & Review

To ensure that this policy is operating effectively WBS will maintain information of employees on a check sheet to ensure documents are reviewed (appendix 1)

This policy will be reviewed biannually or as a result of future legislative changes occurring before the review date.