


<b>No:</b> TBC	<b>Document Title</b> Right to Work Policy – Internal	
<b>Revision Level:</b> 0.1	<b>Issue Date</b> 29/09/2021	

### **Right to Work Policy – Internal**

This policy applies to HSG Facilities Management and its subsidiaries regarding directly employed personnel. References within the policy to “HSG Facilities Management” shall, where the context permits, include HSG Facilities Management subsidiaries.

#### **1. PURPOSE AND SCOPE**


- 1.1 HSG Facilities Management is committed to providing a working environment that is free from risks to the health and safety of our employees, contractors and visitors to our premises and operational sites. To that end, we will take all statutory and practicable measures to ensure that only those who are eligible to work in the UK are employed by HSG Facilities Management on HSG Facilities Management’s premises and operational sites. This is essential to prevent illegal working and the associated legal consequences.
- 1.2 This policy sets out the framework to ensure that HSG Facilities Management is compliant with UK legislation and requirements regarding an individual's right to work in the UK.
- 1.3 This policy may be amended or withdrawn by HSG Facilities Management at any time at its absolute discretion.

#### **2. UK REQUIREMENTS**

- 2.1 UK law imposes obligations on employers to verify an employee's right to work and be able to evidence having done so. To that end, HSG Facilities Management requires those responsible for hiring personnel to verify they have the right to work in the UK and to retain records of such verification.

#### **3. RIGHT TO WORK VERIFICATION**

- 3.1 The "right to work" is the legal right to work in the UK (whether on an unlimited or time-limited basis). HSG Facilities Management have a duty to make manual or online checks on every person they intend to employ before they start work to ensure they have the right to undertake the work in question in the UK. This will involve checking an individual's documentation (which must be acceptable evidence as prescribed by the Home Office) in their presence, retaining a copy of it and making a compliant record of that right to work check. Repeat checks must be completed against anyone with time-limited permission to work in the UK. HSG Facilities Management are required to diarise when their employee's immigration permission expires and have sufficient tracking processes in place to ensure a repeat right to work check is completed prior to expiry.
- 3.2 HSG Facilities Management operates a "no paperwork, no entry" rule for its own personnel and will ensure they do not enter or work on any HSG Facilities Management premises or operational site unless and until their right to work in the UK has been verified.
- 3.3 As the UK has now left the EU, EEA passports, national identity cards and specified EEA Regulations documents, which only confirmed the individual’s nationality or that they were

<b>No:</b> TBC	<b>Document Title</b> Right to Work Policy – Internal	
<b>Revision Level:</b> 0.1	<b>Issue Date</b> 29/09/2021	

exercising EEA Treaty Rights are no longer admissible as evidence of right to work in themselves. Verification can be carried out at <https://www.gov.uk/view-right-to-work>.

#### 4. RESPONSIBILITIES

4.1 HSG Facilities Management management, at all levels of responsibility, are expected to be aware of the applicable requirements of this policy when hiring personnel.

4.10 HSG Facilities Management Board of Directors – Responsibility for HSG Facilities Management’s policy in relation to right to work requirements. Ensure suitable resources are made available to meet the HSG Facilities Management responsibilities as stated in this policy.

4.12 Hiring Managers are responsible for checking the right of each employee to work in the UK as set out in section 3 of this document

4.13. The Operations Director is responsible for ensuring HSG Facilities Management comply with this policy and applicable laws including Immigration, Asylum and Nationality Act 2006, Modern Slavery Act 2015, UK\_GDPR and the Data Protection Act 2018.

#### 5. AUDIT


5.1 HSG Facilities Management will conduct internal right to work compliance audits to assess compliance with applicable right to work legislation in the UK.

5.2 The scope of audit may also include verification of compliance with other legislation such as the Modern Slavery Act 2015 and General Data Protection Regulations.

#### 6. IDENTIFIED OR SUSPECTED ILLEGAL WORKING

6.1 Where an HSG Facilities Management employee discovers or has reasonable cause to believe that an individual working on HSG Facilities Management premises or an operational site does not have the right to work in the UK, they should notify the Operations Director without delay. Senior Management will then investigate the matter.

6.2 Where illegal working is suspected on a site, the local team should only gather the minimum level of information required in order to pass this on to the HSG Facilities Management Operations Director. Illegal working can also be linked to other factors such as modern slavery and exploitation etc. It may be necessary for the Police/ authorities to conduct an investigation covertly to avoid notifying criminal parties /gang leaders etc. As such, it is vital that HSG Facilities Management staff do not interfere with this process and comply with instructions given by the Operations Director and any relevant authorities where applicable.

<b>No:</b> TBC	<b>Document Title</b> Right to Work Policy – Internal	
<b>Revision Level:</b> 0.1	<b>Issue Date</b> 29/09/2021	

## 7. DATA PROTECTION

7.1 Personnel data including data on the Right to Work in the UK is processed in accordance with the HSG privacy policy.

7.2 HSG Facilities Management will only keep personal data and special category personal data for as long as is necessary to fulfil the purposes we have collected it for.

## 8. CHANGE IN LAW

8.1 HSG Facilities Management reserves the right to make any changes to this policy that are required to meet any changes in UK law which may come into force. Where such changes are made, HSG Facilities Management will carry out any actions required by any change in law and update its policies as necessary.

## 9. QUERIES

9.1 Any queries about this policy should be raised with the HSG Facilities Management Operations Director.

**Ashley Govier**  
**Managing Director – HSG Facilities Management Ltd.**