

G4S Screening Policy



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Document Owner and Approver(s)

Owner International HR
Approver(s) Chief Human Resources Officer - International

Version control

Version	Version date	Document history
1.0	01/06/2008	Group Screening Policy issued
2.0	01/06/2010	Group Policy revised
2.1	01/05/2016	Group Policy revised in line with HR Core Standards review
3.0	01/05/2017	Group Policy revised. Additional guidance on screening for 'high' risk roles included in clauses 3.3, 3.4.2 and 3.7
3.1	01/05/2019	Group Policy reviewed. No amends. Date extended
3.2	16/03/2020	Revisions and changes to most sections
3.3	21/07/2021	Minor change to update Policy owner and approver
3.4	18/04/2023	Revisions and changes to most sections

Internal distribution list

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G4S SCREENING POLICY

In order to ensure that the people we employ are suitable to conduct their role in a way that does not compromise security and/or safety of our employees, customers and others that come into contact with our operation or customer assets and to manage and protect G4S' reputation arising from the employment of those people whose background, character or physical capability may not be in line with our requirements, each business must apply certain minimum background screening and vetting procedures when selecting people for employment.

The G4S Screening Policy sets out the minimum standards required by the business in respect of screening and vetting. All employees, including temporary employees, self-employed, agency workers, sub-contractors and consultants must, as a minimum, be screened to the standards within the Policy.

Each business must ensure that the screening processes are legally and contractually compliant and appropriate for the level of risk. Where country, contract, legal, or level of risk necessitates a higher level of screening, this will always take precedence over the minimum standards outlined in the Policy. It is the responsibility of each business to assess these factors, and to apply the standards necessary to ensure that only suitable individuals are selected for employment, both in relation to personal and employment background, and physical and mental suitability to safely deliver in the role.

The G4S Screening Policy sets out two levels of screening:

Level 1 - Standard Screening - Lower risk roles

Level 2 - Enhanced Screening - Higher risk roles including employees who are armed or have access to/are responsible for administering, carrying, transporting, storing or handling lethal and/or non lethal weapons (for instance firearms and ammunition, both live and dummy).

Each business is required to identify the roles which fall within the 'higher risk' category (Level 2) to ensure that the level of screening completed is appropriate for the role. Employees transferring from a 'lower risk' role, to a role identified as 'higher risk' should be rescreened to the required level, including relevant medical assessment, before commencing the role.

The business must have a process in place for on-going screening of employees deemed to be in a higher risk role. The frequency of re-screening should be assessed and determined taking into account country, contract and legal requirements, as well as the level of risk of the role and environment (including the mental and physical suitability of the employee).

Personal data relating to applicants and employees obtained for the purpose of screening must always be treated as confidential, and robust controls must be put in place to ensure that only necessary data is collected, that it is stored, processed and destroyed in line with data protection requirements. Those requirements are defined in European and country regulations and enacted in the respective business policies.

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Screening level	Role outline	Qualifying criteria (where one or more applies)	Pre-employment screening requirements	Pre-employment medical assessment requirements	Post-employment screening requirements
Level 1 - Standard Screening	'Lower risk' roles for which physical and mental capability and background have a normal level of impact on the safety and/or security of the employee and others	<p>Do not use or have access to equipment that is provided to protect people in the event of an attack or assault, for example firearms, ammunition, batons, pepper sprays etc</p> <p>Do not have access to, carry, store or handle valuable assets* or cash for instance in Cash Centres or CIT as part of their normal daily duties</p> <p>Do not have access to vulnerable people, e.g. "elderly", children, people in hospital, people in immigration detention, people in prison</p>	<p>Right to work in the country</p> <p>Identity check</p> <p>Minimum age check for all direct / operational employees, and in line with contract or legislative requirements</p> <p>Licence/certificate if required for role (e.g. driving, security, professional)</p> <p>Criminal record/licence check OR (Only in countries where criminal /licence checks are not available or not reliable/not legal) Verbal (documented) or written verification of employment /personal history covering the last 12 months</p>	To be covered as part of the induction process	No requirement for post-screening written verification of employment

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Screening level	Role outline	Qualifying criteria (where one or more applies)	Pre-employment screening requirements	Pre-employment medical assessment requirements	Post-employment screening requirements
Level 2 - Enhanced Screening	<p>Higher risk roles for which physical and mental capability and background have a material potential impact on the safety and/or security of the employee and others through the execution of the role.</p> <p>Roles where there is a legal or contractual requirement, or a level of risk which necessitates enhanced rather than standard screening.</p>	<p>Have access to high security sites such as embassies, ports, airports, secure critical national infrastructure such as nuclear power plants, oil and gas sites and prisons</p> <p>During the normal part of their normal duties or work has access to, carries, stores or handles high value assets, cash or information. For example in Cash Centres or CIT Operations and *where the 'value' is so critical that the loss or corruption would have serious impact on the organisation's (G4S or Client) ability to perform its mission or conduct business</p> <p>Access to vulnerable people (e.g. elderly, children, people in hospital, people in immigration detention or prison)</p> <p>Nature of the environment such as hostile territory, or in people's homes.</p> <p>Nature of the role, for example, working in close protection</p>	<p>Right to work</p> <p>Identity check</p> <p>Minimum age check if applicable</p> <p>Licence/certificate if required for role (e.g. driving, security, professional etc)</p> <p>Criminal record/ licence check before start date AND</p> <p>Verbal (documented) or written verification of employment/personal history covering the last 2 years (either before commencement of employment or within 8 weeks of start date)</p>	<p>Completion of a medical questionnaire and self-declaration of physical and mental fitness for role (against a set of job requirements) can be used as a medical screening tool under the following conditions:</p> <ul style="list-style-type: none"> The questionnaire has been written by a medical practitioner who has knowledge of the job requirements; There is a robust process of referral associated with the medical questionnaire and; The questionnaire and self-declaration are used in conjunction with other risk mitigation measures relevant to the business, contract and role <p>See Appendix 2</p>	<p>Verbal (documented) or written verification of employment history covering the last 2 years within 8 weeks of start date IF NOT already completed prior to start date</p> <p>Ongoing Screening: Each business must have a process in place for on-going screening of employees deemed to be in a 'higher risk' category</p>

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Level 2 - Enhanced Screening cont...	Roles where employees are issued with, have access to, carry, transport, store, use or are responsible for the administration of any lethal/non lethal weapons	Use or have access to equipment that is provided to protect people in the event of an attack or assault, for example firearms, ammunition (live or dummy), tasers, stun guns, paint guns, batons, grenades, pepper sprays etc		Completed by a suitably qualified health practitioner prior to the issuing of firearms. Must cover: <ul style="list-style-type: none"> ● Physical capability to use firearms ● Mental health suitability for role ● Determine whether employee's mental capacity could be impaired ● Vision test 	
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* **High value/valuable assets:** where the 'value' is so critical that the loss or corruption would have serious impact on the organisation's (G4S or Client) ability to perform its mission or conduct business

EXCEPTIONS TO POLICY REQUIREMENTS

In view of the diversity of services provided by the Company, there are occasions when the screening requirements set out above will be relaxed. Lower risk roles - Cleaners and Clothing Manufacturers - agreed by exception, for which physical and mental capability and background have **limited potential impact** on the safety and/or security of the employee and others through the execution of the role, will require **basic level checks only** IF all of the following qualifying criteria is met, and where there is no contract/country/legal/risk requirement for a more enhanced level of screening:

- **Do not** use or have access to equipment that is provided to protect people in the event of an attack or assault, for example firearms, ammunition, tasers, batons, pepper sprays etc
- Do not work in restricted areas
- **Do not** have access to, carry, store or handle valuable assets* or cash for instance in Cash Centres or CIT **as part of their normal daily duties**
- **Do not** have access to vulnerable people, e.g. elderly children, people in hospital, people in immigration detention, people in prison

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- Roles are not covered by any of the provisions listed above

Screening requirements for agreed exceptions:

Pre-employment	Pre-employment medical	Post-employment
Right to work verification Identity check Proof of address Minimum age check Licence/certificate if required for the role 1 verbal (documented) or written employment reference for most recent employer within the past 12 months	To be covered as part of the induction process	No requirement for post-screening written verification of employment

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GUIDANCE/CLARIFICATIONS

Appendix 1 - Policy guidance: [click here](#) for guidance on policy requirements

Appendix 2 - Pre employment medical assessments: [click here](#) for further information on [Medical Assessments](#)

Level 2 (Higher risk roles): Self-declaration on a medical questionnaire cannot not be considered as a fitness for duty assessment in isolation.

Where contract requirements / country regulation / referral due to declaration on medical questionnaire requires a medical assessment of physical and mental suitability for the role, this must be undertaken by a medical practitioner who has knowledge of the job requirements.

Any physical and mental fitness for duty assessment must be administered by a medical practitioner and comply with data protection rules.

Reasonable adjustments: Local processes should define the feedback loop to Operational management when reasonable adjustments are recommended by a medical practitioner.

Adverse criminal/police checks: Local processes should define escalation and approval process where adverse criminal/police checks are obtained.

Controlled Self Assessment (CSA): Audit process is aligned with the minimum standards as set out in the G4S Screening Policy, against which businesses will be audited.

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