

Contractor Background Screening Policy

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Purpose

Wilmington Plc ("Wilmington") believes that engaging qualified individuals contributes to our overall strategic success. All engagements are subject to the satisfactory completion of relevant background checks. The information we collect helps Wilmington promote a safe work environment. Background checks also help us obtain information necessary to determine an engagements overall suitability and to ensure the protection of Wilmington's physical property, information and other assets.

We are committed to complying with ISO compliance standards and our data protection obligations, and this policy supplements the Contractor Privacy Notice, which can be found in the Contractor online area, or is available on request.

Wilmington's Data Protection Officer is responsible for informing and advising Wilmington on its data protection obligations and for monitoring compliance with those obligations and with Wilmington's policies. If you have any questions or comments about the content of this policy or if you need further information, you should contact the data protection officer by email dataprotection@wilmingtonplc.com or by writing to "Data Protection Officer, Fort Dunlop, Suite 215/216, 2nd Floor, Fort Parkway, Birmingham B24 9FD.

This policy will be reviewed in accordance with our data protection obligations. It does not form part of any contractor agreement, and we may amend, update or supplement it from time to time.

Background Checks

Some or all of the following background checks may be required dependent upon scope of work:

- Right to Work / Proof of Identity;
- Adverse Financial Credit check – previous 6 years;
- Basic Criminal Disclosure Check (DBS), including an international criminal background check where applicable and available;
- Enhanced DBS.

Who is Covered?

In addition to obtaining proof of Right to Work in the UK, as relevant, for contractors, further background screening checks will be conducted where the scope of work involves:

- Delivery of training;
- A high level of trust or authority, with risks related to fraud or bribery, heightened access to systems and security infrastructure;
- Access to employee personal/sensitive information relating to individuals;
- Working with or unsupervised contact with children, including students under 18, or vulnerable adults;

In addition, Wilmington is obligated to conduct further background screening for some roles that are bound by commercial/client contractual requirements with third parties.

Our legal basis for processing personal data is a legitimate interest in conducting background screening for roles where access to sensitive security and financial information may present a heightened risk, or in cases of trainers' contact with students. Subsequent screening repeats every 2 years.

Procedure

Background checks will be conducted by a specialist and independent third-party company retained by Wilmington to complete these checks on our behalf.

The External Engagements team will be primarily responsible for the background check process.

Contractors will be made aware that their engagement is subject to the receipt of appropriate clearance.

Instructions to enable an application for background checks will be sent to the individual via the third-party portal. Typically, the background checking process is normally expected to be completed within four weeks following receipt of the appropriate documentation from the engagement. Contractors are required to provide all necessary information to complete the background checking process in a timely and appropriate manner. Failure to do so may mean unsatisfactory completion of the background checking process.

Background check reports are retained in the third-party system, accessed only by the External Engagement Team. Credit checks do not leave a credit footprint and do not disclose specific information in relation to credit or convictions. Contractors and their business contact will be advised when the background checking process has been completed together with the outcome of the background check.

Contractors cannot start work on any project for Wilmington until a Right to Work check has been completed, or a decision made that the arrangement falls out of scope. New engagements can start working before completion of DBS or Adverse Financial Checks. In such cases, if you fail to gain satisfactory completion of the background checks, your contract may be terminated. However, where a previous conviction is identified, it does not automatically disqualify you from consideration for an engagement with Wilmington. Depending on a variety of factors (for example, the nature of the position, the nature of the conviction, age of the candidate when the illegal activity occurred), the engagement may still go ahead.

However, should a contractor attempt to withhold information or falsify information pertaining to previous convictions, the contractor will be disqualified from further engagement consideration in any position with the company due to falsification of an application.

Change to Circumstances

Contractors should inform their business contact if their ongoing circumstances change in a way which could impact on their eligibility to work or which contravenes this policy. Failure to do so may result in termination of the contract.

Record Keeping

All information obtained from the background check process will only be used as part of the engagement process and will be kept strictly confidential. All data in relation to the check will be retained in the third-party system. Only appropriate External Engagement personnel have access to this information.

Data will be retained while the engagement continues and for at least 2 years after it ceases (from the end of the tax year in which the contractor was no longer engaged).