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## 1.0 Policy Statement

Traffic Labour Supplies Ltd have a policy that they will only employ workers who have a legal right to work in the UK. As far as is reasonably practical, they also aim to ensure that their supply chain only employs workers who have a legal right to work in the UK.

The organisation has documented controls in the form of a written procedure (PR38 – Fastlane Operative Setup & Initial Registration) and software (Fastlane) which demonstrates compliance with sections 15 to 25 of the Immigration, Asylum & Nationality Act 2006 (see 2.0 Procedure for details)

The controls are applicable to all employees, both full time employed (PAYE) and agency (temporary and seasonal), self-employed sub-contractor or individual via a limited company. The controls also apply to current and potential employees.

Documents used to verify right to work are compliant with the Home Office Guidance “Comprehensive Guidance for Employers on Preventing Illegal Working”

## 2.0 Procedure

- Foreign workers and their nationalities are identified at the Initial Registration & Setup process. This is triggered either by a potential worker registering on the Company’s website or by direct contact with a member of TLS staff.
- The process by which a new worker is registered and set-up on the Company’s bespoke software system is described in detail in the Procedure PR38 – Fastlane Operative Set-up & Initial Registration.
- Amongst a number of document checks relevant to the Company’s operations, documents proving right to work in the UK are requested before any worker is registered to work for TLS Ltd. Specifically, documents requested include, but are not limited to, Current UK Passport, birth certificate and National Insurance Number (written proof of). If a foreign passport is presented it will be considered as long as the correct documentation (visas or otherwise in line with government guideline) accompany the application.
- For full time (PAYE) employees with a written employment contract, the checks are performed prior to offering a position and issuing a contract of employment. If proof of right to work cannot be produced, the position will not be offered and no contract of employment will be issued.
- Any documents provided by a worker (full time, agency (temporary and seasonal), self-employed or otherwise) are retained by the Company, in line with General Data protection Regulations, for the duration of the time that the worker is employed by the company plus a minimum of two years after the worker has left the employment of the Company. Documents are stored either in

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hard copy form or electronically on the Fastlane database which is security protected from unauthorised access and unintentional data loss.

- The Fastlane software automatically alerts TLS Ltd. staff members if a document used to verify right to work in the UK by any employee including agency (temporary and seasonal) workers, self-employed or otherwise is due to expire (e.g. UK Passport or visa). In this case, the worker in question is contacted to inform them of the impending expiration of the document and that they must provide a new, valid document before the expiration date of the existing document, otherwise their employment with the Company will cease on the date of the expiration of the existing document.

**Paul Chamley**

A handwritten signature in black ink, appearing to read 'P. Chamley', written over a faint circular stamp.

**Managing Director**

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#### Revision History

| Revision | Date       | What has changed?        | Who has written it? | Who has approved it? |
|----------|------------|--------------------------|---------------------|----------------------|
| 00       | 15/12/2021 | First Issue              | Systems Manager     | MD                   |
| 01       | 24/01/2023 | New TLS Group Logo added | Systems Manager     | MD                   |
| 02       | 17/01/2024 | Annual review            | Systems Manager     | MD                   |
| 03       | 17/01/2025 | Annual review            | Systems Manager     | MD                   |
| 04       | 17/01/2026 | Review                   | Systems Manager     | MD                   |

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