

## Pre Employment Suitability Screening – Information for candidates

### Introduction

ScottishPower carries out pre-employment suitability screening of successful candidates for two distinct types of roles: roles which are considered to be commercially high risk, and roles working with children and vulnerable adults. Pre-employment suitability screening helps ensure that suitable candidates are placed in these roles. Where screening is considered appropriate, the advert for the vacancy will carry this information. Graduate Trainees will also be subject to this type of pre-employment suitability screening.

### Commercially High Risk Roles

Commercially high risk roles include any role where the potential risk of employing an unsuitable candidate is deemed significant to the Company. This definition includes Senior Leadership Group (SLG) and other senior roles where the role-holder will have responsibility for managing large budgets or will have access to highly sensitive commercial systems and information. Senior specialist roles where professional qualifications are critical to the performance of the job could also be considered high risk.

### Customer Facing Roles involving Contact with Children or Vulnerable Adults

This definition applies to any role requiring regular interaction with the general public which may involve unsupervised access to children or vulnerable adults.

Existing ScottishPower roles in this category include:

Direct Sales Agents, Sales & Marketing Department, Energy Retail  
Business and Community Relations Staff, Energy Retail  
Meter Readers, Dataserve, Energy Retail  
Debt Advisory Staff, Dataserve, Energy Retail  
Revenue Protection Service Staff, Operations, Energy Retail  
Shift Electrician Staff, Energy Networks  
DART (Direct Action Response Team) Staff, Energy Networks  
ScottishPower Learning Advisors

Any roles which require employees to work within schools or undertake projects with children or vulnerable adults.

### Screening Methods

Screening for **commercially high risk roles** is conducted by an external risk consultancy and there are different levels of integrity check which can be conducted, Levels 1, 2, 3 and 4. The level of screening will be that deemed appropriate for the role, however, in most circumstances this will be a Level 2 screening.

Screening for all **customer facing high risk roles** is carried out by the Government agency, Disclosure Scotland, which is part of the Scottish Criminal Record Office (SCRO). They disclose criminal history information to individuals and organisations for employment and other purposes. There are three levels of disclosure that can be carried out, Basic Disclosure, Standard Disclosure and Enhanced Disclosure.

The Company will, in the main, use Basic Disclosures where employees have regular interaction with the general public where they might have unsupervised access to children or vulnerable adults. Standard and Enhanced Disclosures will only be used in areas where employees have regular ongoing contact with children and/or young people under the age of 18, people with disabilities and the elderly. This may involve requesting a check against the Disqualified from Working with Children List (DWCL), in accordance with The Protection of Children (Scotland) Act 2003.

## Screening Process

Applicants for **commercially high risk roles** will be asked to complete a more detailed Application form which will include a signed declaration and consent for the information to be passed on to the external risk consultancy. Once the successful candidate has been selected, their application will be forwarded to the risk consultancy for the appropriate level of check.

Candidates for **customer facing high risk roles** will be asked to complete a disclosure application form and give their consent to undergo a Disclosure Check. Once Disclosure Scotland has completed the check, they will present the candidate with a disclosure certificate. The candidate is then required to show the certificate to the Company via the HR PAS Recruitment Team. Candidates may also be asked to sign a consent form to allow the Company to receive and open the disclosure certificate. If the candidate prefers, the HR PAS Recruitment Team will forward the sealed certificate, unopened, to the candidate's home address. If candidate fails to return this consent form signed, then the HR PAS Recruitment Team will assume that this second choice is their preference.

If a candidate withholds their consent for pre-employment suitability screening to take place then they will be disqualified from the recruitment and selection process.

## Screening Results

Where pre-employment suitability screening is a pre-condition of employment, the Company must be satisfied with all of the information revealed by the screening agencies before any offer of employment is unconditionally confirmed to a candidate.

If, during the screening process, unsatisfactory information about a candidate is revealed, the Company may discuss the unsatisfactory information with the candidate before making a decision about continuing or withdrawing the offer of employment.

## Recruitment of Ex Offenders

The Company complies fully with the Code of Practice in connection with the use of information provided to registered persons and other recipients of information by Disclosure Scotland under Part V of the Police Act 1997, for the purposes of assessing applicants' suitability for positions of trust. The Company undertakes to treat all applicants fairly and not to discriminate on the basis of conviction or other information revealed.

It should be noted that having a criminal record will not necessarily prevent the Company from making or confirming an offer of employment to a candidate. This decision will depend on the nature of the position, together with the circumstances and background of any criminal offences.

## Disclosure Information

The Company complies with the Code of Practice regarding the correct handling, holding and destruction of disclosure information provided by Disclosure Scotland under Part V of the Police Act 1997, for the purposes of assessing applicants' suitability for positions of trust.

The Company also complies with the Data Protection Act 1998 and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of such information.