

Contractor Status and Scope

This handbook is guidance issued by Boden Group to Contractors undertaking assignments with Client organisations. It is not an employment contract and does not make Boden Group the Contractor's employer. Nothing in this handbook is intended to confer employee status, continuity of employment, entitlement to employee-only benefits, or a guarantee of work or future assignments. A Contractor's legal status and rights depend on the contractual arrangements applying to the engagement and any applicable statutory rights.

For the purposes of this handbook, 'Contractor' means an individual supplied or introduced by Boden Group to undertake an assignment for a Client, whether engaged through an umbrella company, personal service company or other permitted engagement arrangement. The term is descriptive only and does not determine employment, worker, agency worker, tax or other legal status. Where legislation uses a specific statutory term, such as 'employee', 'worker' or 'agency worker', that statutory terminology is retained only where necessary to explain the relevant legal right or obligation.

Contents

Welcome to Boden Group
About the Handbook
Our Commitment to You
Dignity in the Workplace Policy and Procedure
Confidentiality Policy
Complaints Procedure
Whistleblowing Policy and Procedure
Equal Opportunities Policy
Data Privacy Statement
Modern Slavery & Human Trafficking
Lone Worker Policy
Health and Safety Policy
Right to Work Check Policy
Reference Request Policy
Overseas Police checks
Induction policy
Mandatory Training
Agency Worker Regulations
Guidance for working via Umbrella Company
Employment Agency Standards Inspectorate
Timesheets
Contacts

Welcome to Boden Group

We are very pleased that you have chosen to join us.

We believe that everyone has a part to play in creating a better future for our clients and candidates in the Facilities Management and Property Sectors. We're dedicated to supporting our team to make a meaningful impact.

Our mission is to help individuals find their dream job and assist companies in achieving growth and success.

Our vision is to be recognised as the leading recruitment service in the facilities management and property industries.

Our success strategy focuses on fostering a culture of teamwork, collaboration, and creativity that empowers our people to drive innovation and achieve client & candidate satisfaction.

About the Handbook

This handbook is issued by Boden Group in its capacity as a recruitment agency/employment business to contractors supplied or introduced to client organisations. It does not create a contract of employment between you and Boden Group. Your contractual and payment arrangements will be governed by your applicable Terms of Engagement, assignment documentation and, where relevant, the terms of any intermediary or umbrella company through which you provide your services.

When you accept an assignment arranged through Boden Group, you are required to comply with the applicable Terms of Engagement, assignment requirements and the policies and standards in this handbook. Unless a statutory term is expressly used to explain legislation, references to 'Contractor' mean the individual supplied or introduced by Boden Group for the relevant assignment.

You will receive the handbook electronically and be required to confirm with a signed declaration, that you have read and understand its content and instructions on what to do if you need any clarity. Please familiarise yourself with the information provided and keep the handbook in a safe place in case you need to refer to it later.

If there is anything you do not fully understand please contact your consultant without delay.

From time to time, we will review our policies and procedures in line with changes in legislation, recruitment Frameworks, or registration requirements. We will update you in writing via the email address we have on file for you so please ensure this is kept updated on our records.

We really hope you enjoy your time while you are accepting work with us, and we look forward to working with you.

Our Commitment to You

- We encourage open communication any issues, get in touch.
- Our team will be polite, friendly and helpful.
- On receipt of a properly completed and approved timesheet we will pay you without delay in accordance with our policy (see Timesheets).
- We will help you with your compliance and updates.
- We will always aim to make you feel welcome.
- We will treat everyone fairly and equally.
- We will ensure you receive competitive rates of pay.
- If you have questions on our benefits your consultant will be able to assist you.

Dignity in the Workplace Policy and Procedure

Introduction

Boden Group is committed to supporting assignments in which Contractors, candidates, Client personnel, visitors and others encountered in connection with an assignment are treated with dignity and respect and are not subjected to bullying, harassment, sexual harassment, victimisation or retaliation.

This policy applies in the workplace and to conduct connected with work, including client premises, remote working, business travel, work-related social events, training, conferences, telephone calls, email, messaging platforms, social media and other electronic communications.

All concerns may be raised through your recruitment consultant, compliance@boden-group.co.uk, kelsey@boden-group.co.uk, or directly with the MD of the Contract and Interim division at ryan@boden-group.co.uk. A concern involving one of those contacts may be raised through any of the alternative routes. You do not have to raise a concern with the person involved before reporting it.

Policy

Boden Group will not tolerate bullying, harassment, sexual harassment or victimisation. Everyone covered by this policy must treat others with respect and must not engage in conduct that contravenes this policy.

Boden Group will take all reasonable steps within its control to prevent sexual harassment in connection with work. Our approach is preventative as well as responsive. This includes assessing relevant risks, implementing proportionate preventative measures, providing information and training, maintaining accessible reporting arrangements, responding promptly to concerns, taking appropriate action where issues are identified, and reviewing the effectiveness of the measures in place.

Boden Group managers and relevant personnel are responsible for implementing this policy, responding appropriately to concerns and escalating risks or incidents without delay. Contractors are encouraged to report conduct they experience or witness so that appropriate action can be considered.

Complaints and concerns will be treated seriously, sensitively and as confidentially as reasonably practicable, while recognising that information may need to be shared on a need-to-know basis to investigate and address the matter fairly. Victimisation, retaliation or detrimental treatment because a person has raised a genuine concern, supported another person's complaint or participated in an investigation is prohibited.

A breach of this policy may result in appropriate action under the relevant contractual or assignment arrangements. Depending on the circumstances, this may include removal from an assignment, suspension from further assignments, termination of an engagement or referral to the client, employing entity or other responsible organisation. Where the alleged perpetrator is engaged by another organisation, Boden Group may raise the matter with that organisation and take appropriate protective or contractual action.

Contractors may provide services under different engagement arrangements and may have different statutory rights depending on their circumstances. Boden Group will comply with the legal obligations applicable to its role and will apply the conduct standards and reporting arrangements in this policy to Contractors irrespective of their engagement model.

Where a Contractor is engaged through an umbrella company, personal service company or other intermediary, Boden Group may cooperate with that organisation and the Client to address risks, reports and protective measures, subject to applicable legal and contractual obligations. Nothing in this policy determines whether an individual is an employee, worker, agency worker or self-employed person for statutory purposes.

Preventing Sexual Harassment and Risk Assessment

Boden Group will periodically assess the risk of sexual harassment affecting Contractors in connection with assignments and will review relevant risks when circumstances materially change or where an incident, complaint or concern identifies a potential weakness in existing preventative measures.

Relevant factors may include client-controlled workplaces, lone or night working, work involving members of the public, patients or service users, work-related social events, travel, alcohol-related events, power imbalances, previous concerns, isolated working environments, and the level of supervision available. Appropriate preventative measures will be identified and recorded according to the circumstances.

Interpretation of Bullying

Bullying is offensive, intimidating, malicious or insulting behaviour, or an abuse or misuse of power, which undermines, humiliates or injures another person. Bullying may be a repeated pattern or, depending on its seriousness, a single incident. Examples may include:

- Whispering, gossiping campaigns, or spreading malicious rumours.
- Picking on, taunting, teasing, humiliating or ostracising an individual.
- Shouting at, berating or humiliating another person in public.
- Aggressive or excessive unjustified criticism.
- Deliberately creating a situation in which another person is likely to fail.
- Undermining a person's ability to carry out or take credit for their work.
- Intentionally blocking appropriate promotion, training or career opportunities.
- Persistent disrespect, intimidation or unreasonable conduct towards colleagues or managers.

Bullying does not need to take place during working hours or on work premises. Conduct through social media, WhatsApp, Teams, email or other communication channels may fall within this policy where it is connected with work.

Interpretation of Harassment

Harassment is unwanted conduct related to a relevant protected characteristic which has the purpose or effect of violating a person's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. Relevant protected characteristics for harassment under the Equality Act 2010 include age, disability, gender reassignment, race, religion or belief, sex and sexual orientation.

Harassment may take many forms and may be directed at one person or affect others who witness it. Examples include physical or threatening behaviour; offensive, abusive, malicious or insulting comments; discriminatory jokes or language; offensive images, posters or messages; exclusion or isolation; pestering, spying or stalking; and unwanted conduct through electronic communications or social media.

Interpretation of Sexual Harassment

Sexual harassment is unwanted conduct of a sexual nature which has the purpose or effect of violating a person's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. A person may also be unlawfully treated less favourably because they rejected or submitted to unwanted conduct of a sexual nature or unwanted conduct related to sex or gender reassignment.

Sexual harassment can be a single incident or a pattern of behaviour. It can occur in person or through digital communications and can affect someone even where the conduct was not specifically directed at them. Examples include, but are not limited to:

- Sexual jokes, banter, innuendo or suggestive remarks.
- Lewd, degrading or sexual comments about a person's body, appearance, clothing or sex life.
- Staring, leering, sexual gestures or deliberately invading personal space.

- Unwelcome touching or other physical contact of a sexual nature.
- Repeated or unwanted invitations for dates, sexual contact or relationships.
- Sexual propositions, advances or requests for sexual favours, whether verbal, written or electronic.
- Asking intrusive questions of a sexual nature.
- Displaying, sending or circulating sexually suggestive or sexually offensive writing, images, memes, videos or other material.
- Sexual conduct through email, text, WhatsApp, Teams, social media or other online platforms.
- Sexual comments or conduct at work-related social events, during business travel or at client premises.

Conduct can be unwanted even where the person did not expressly object at the time. The absence of an objection does not, by itself, mean that conduct was welcome.

Preventing Sexual Harassment and Risk assessment

Boden Group will maintain sexual harassment risk assessments proportionate to the nature of its recruitment activities and the assignments it arranges. Assessments will identify relevant risks, existing control measures, any further preventative action required, responsibility for implementation and appropriate review dates.

Where an assignment presents an elevated risk, Boden Group will consider additional safeguards and liaise with the Client or other relevant organisation to agree appropriate preventative measures. Risk assessments will be reviewed at suitable intervals and following a significant incident, complaint, change in working arrangements or identification of a new risk.

Boden Group will review the effectiveness of its sexual harassment preventative arrangements at appropriate intervals, taking account of reported incidents, complaint outcomes, identified trends, Contractor feedback, changes to Client assignments and relevant legal or regulatory developments. Findings and agreed improvements will be documented and assigned to an appropriate responsible person

Third Party Harassment

Boden Group will not tolerate harassment of Contractors by third parties encountered in connection with an assignment. Third parties may include Clients, Client employees and managers, customers, patients, service users, other contractors, suppliers, visitors and members of the public.

Boden Group will take all reasonable steps required of it under applicable law and within its control to prevent third-party harassment. Depending on the assignment and identified risks, this may include communicating expected standards to Clients, considering harassment risks when assessing assignments, providing Contractors with clear reporting routes, requiring appropriate Client cooperation, and taking action where concerns arise.

Third-party harassment should be reported even where it appears to be a one-off incident. A Contractor does not need to wait for conduct to be repeated before raising a concern.

Following a report, appropriate action may include raising the matter with the Client or other responsible organisation, requesting protective measures, changing reporting or working arrangements, preventing further contact with the third party, removing a Contractor from an unsafe situation, escalating the matter within the Client organisation, terminating an assignment or Client relationship where appropriate, or reporting potentially criminal conduct to the relevant authorities.

No individual will be subjected to victimisation, retaliation or detrimental treatment because they have raised a genuine concern about harassment, supported another person's complaint or participated in an investigation.

Boden Group expects Clients to maintain appropriate arrangements for preventing and addressing sexual harassment within workplaces and activities under their control, including arrangements affecting Contractors supplied through Boden Group.

Where a concern arises, Boden Group will seek appropriate Client cooperation in investigating the matter, implementing protective measures and preventing recurrence. Where a Client does not adequately address an

identified risk, Boden Group will consider escalation, additional safeguards, suspension of the affected assignment or termination of relevant commercial arrangements, subject to the circumstances and applicable contractual terms.

Where a Contractor reports sexual harassment, Boden Group will consider appropriate interim protective measures, taking account of the Contractor's wishes, safety, confidentiality and the circumstances of the assignment.

A Contractor who reports a genuine concern must not be removed from an assignment, denied future opportunities or otherwise disadvantaged as a punitive response to raising that concern. Any change to site access, duties or assignment arrangements will be considered on its merits, including immediate safety and Client site-control requirements.

Where practicable, Boden Group will seek measures that protect the affected Contractor while minimising unnecessary disruption or disadvantage. Removal from a Client site does not, of itself, establish that an allegation is substantiated or determine whether an assignment has been terminated. Any subsequent action will be considered under the applicable contractual arrangements.

Confidentiality Policy

The policy has been produced to guide staff in protecting confidential information. All contractors supplied or introduced by Boden Group are required to comply with this policy.

Confidential information

A duty of confidence arises when one person discloses information to another in circumstances where it is reasonable to expect that the information will be held in confidence. It is a legal requirement and is established within professional codes of conduct.

What are your obligations?

- All staff have a legal duty to protect personal information they may encounter during their work.
- All contractors must meet the standards outlined in the Dignity in a Workplace Policy (p.4), so that information that is confidential is not compromised.
- Contractors should understand the Freedom of Information Act 2000 so that they know what information can be disclosed and what information is classified as confidential.

Carelessness

- If working in Healthcare sector, do not talk about patients in public places where you can be overheard.
- Do not leave any confidential information lying around unattended.
- Make sure that the general public cannot see any computer screens or other displays of information.

General Data Protection Regulation (GDPR)

The EU General Data Protection Regulation replaces the Data Protection Act (1998). You must maintain the confidentiality of all information regarding clients, staff in accordance with the GDPR. Further information the on GDPR can be found at <https://ico.org.uk>

You must not, without prior permission or other lawful authority, disclose confidential information concerning clients, client personnel, candidates or other individuals. Unauthorised disclosure may constitute a breach of your contractual or assignment obligations and may result in removal from an assignment, termination of the relevant engagement and, where applicable, further legal or regulatory action.

Complaints Procedure

Boden Group is committed to maintaining high standards of service to clients and contractors and to providing accessible routes for concerns about conduct, including bullying, harassment and sexual harassment.

Scope

This procedure applies to complaints raised by Participating Authorities, clients, contractors or other stakeholders engaged with Boden Group. Complaints concerning sexual harassment may be raised by the affected person or by someone who has witnessed or otherwise become aware of the conduct.

How to Raise a Complaint

Complaints may be raised verbally or in writing with the consultant involved, by email to compliance@boden-group.co.uk, kelsey@boden-group.co.uk, or directly with a senior manager where the matter is sensitive, involves the usual contact, or remains unresolved. A Contractor does not need to confront the alleged perpetrator before making a report.

Complaints Handling Process

All complaints will be handled fairly, sensitively and as promptly as reasonably practicable. Boden Group will normally:

- Acknowledge receipt within 2 working days.
- Consider whether immediate or interim protective measures are appropriate, particularly where there is an ongoing risk to a Contractor.
- Investigate the issue proportionately, including gathering relevant information and interviewing appropriate parties.
- Keep information as confidential as reasonably practicable, sharing it only where necessary to investigate, protect individuals or take appropriate action.
- Aim to provide a written response within 10 working days outlining findings and corrective actions, or explain where additional time is required.
- Where a complaint is upheld or a risk is identified, implement appropriate corrective and preventative measures and inform relevant stakeholders as appropriate.
- Where a complaint concerns sexual harassment, Boden Group will consider whether immediate protective action is necessary and will review those measures during the investigation. The person raising the concern will, so far as reasonably practicable, be consulted about measures affecting their assignment.

Following the outcome, Boden Group will consider whether further preventative steps are needed, including Client escalation, revised working arrangements, additional training, changes to risk assessments or monitoring for retaliation. Information will be shared only as necessary and in accordance with applicable confidentiality and data protection requirements.

Protection from Victimisation and Retaliation

No person will be subjected to victimisation, retaliation or detrimental treatment because they have raised a genuine complaint or concern, supported another person's complaint, provided evidence or participated in an investigation. Any concern about retaliation should be reported immediately through any of the reporting routes above.

Record Keeping and Review

Complaints, investigation records, decisions and actions will be securely recorded and retained in accordance with applicable data protection and retention requirements. Relevant trends, recurring risks and lessons learned may be reviewed to identify whether further preventative measures, training, client action or policy changes are required.

Review and Escalation

If the complainant is not satisfied with the resolution, they may request a further review by a director. Boden Group will aim to resolve the review within a further 5 working days where practicable.

Whistleblowing Policy and Procedure

Introduction

The Public Interest Disclosure Act 1998 and Part IVA of the Employment Rights Act 1996 provide protection in specified circumstances to persons falling within the statutory whistleblowing regime. In this section only, the statutory term 'worker' is used where required by the legislation and does not determine a Contractor's status for any other purpose. This policy is intended to encourage genuine concerns to be raised so that potential wrongdoing can be identified and addressed.

This policy does not replace the Complaints Procedure or Dignity in the Workplace Policy. A concern about sexual harassment may, depending on the circumstances, be raised under those procedures and may also amount to a protected disclosure where the statutory requirements are met.

Concerns can be raised via kelsey@boden-group.co.uk or directly with the MD of the Contract and Interim division at ryan@boden-group.co.uk. Alternative internal reporting routes may also be used where appropriate.

Policy

Boden Group will take concerns raised under this policy seriously and will investigate them appropriately. Where a Contractor qualifies for statutory whistleblowing protection, they must not be subjected to unlawful detriment because they have made a protected disclosure. Boden Group also prohibits retaliation against Contractors who raise genuine concerns under this policy.

Information will be handled as confidentially as reasonably practicable, while recognising that limited disclosure may be necessary to investigate or address the matter. Deliberately making a knowingly false allegation may result in appropriate action, but a concern will not be treated as improper merely because it is not ultimately substantiated.

Qualifying Disclosures

For the purposes of the statutory whistleblowing regime, a qualifying disclosure is a disclosure of information which, in the reasonable belief of the person making it, is made in the public interest and tends to show that one or more of the following has occurred, is occurring or is likely to occur:

- A criminal offence.
- A failure to comply with a legal obligation.
- A miscarriage of justice.
- Danger to the health or safety of any individual.
- Damage to the environment.
- Sexual harassment.
- Deliberate concealment of information tending to show any of the above.

Whether a disclosure is legally protected will depend on the statutory requirements and the route by which it is made.

Procedure

A concern under this policy may be reported to kelsey@boden-group.co.uk or the MD of Contract and Interim at ryan@boden-group.co.uk. Where appropriate, the concern may also be raised with another senior manager or through an applicable statutory reporting route.

The person handling the concern will determine the appropriate scope of investigation and whether other people need to be involved. On completion, the person raising the concern will be informed of the outcome so far as it is appropriate and lawful to do so.

Boden Group will aim to deal with concerns promptly. Where a full response cannot reasonably be provided within five working days, the person raising the concern will, where practicable, be given an indication of the next steps and expected timescale.

Equal Opportunities Policy

Introduction

Boden Resource Ltd is committed to supporting the principle of equal opportunities, and opposes all forms of unlawful or unfair discrimination on the grounds of any Protected Characteristic (PC) including sex; race (including colour, nationality, ethnic or national origin); religion or belief; age; disability; marital status and civil partnership; sexual orientation; gender reassignment; pregnancy and maternity.

This policy covers vacancy advertising, recruitment and selection, training, promotion and conditions of service and is compliant with the following legislation:

- The Rehabilitation of Offenders Act 1974.
- The Local Government Act 1988 and 1999.
- Special Educational Needs & Disabilities Act (SENDA) 2001.
- Racial & Religious Hatred Act 2006.
- The Work & Families Act 2006.
- Equality Act 2010.

Our Commitment

Boden Group aims to create an environment that encourages and values diversity and draws on the different views and experiences of its personnel, Contractors, Clients, partners and candidates. This supports fair and effective service delivery across the assignments and sectors in which Boden Group operates.

We seek to promote diversity and to respond to the needs of all individuals in a fair and equitable manner, whilst observing our commitment and responsibility to current legislation.

To achieve this, we will:

- Fulfil our social responsibility towards Contractors, Boden Group personnel, Clients and the communities in which we operate and the communities in which we operates.
- Recognise all of our legal obligations with particular reference to those acts and directives detailed previously.
- Make all opportunities (including advertising, interview and selection processes, promotion and training) as accessible as possible to under-represented groups.
- Conduct monitoring and to ensure processes are fair, equitable and accessible and to identify any significant under-representation.
- Endeavour to attain a workforce that is representative of the communities from which it is drawn to secure the widest possible pool of talent.
- Recruit, train and promote the best person for the job and to make full use of the recruit, develop and deploy people fairly and make effective use of the talents and resources available across our business and contractor network.
- Create a working environment free from unlawful discrimination, victimisation and create an environment free from unlawful discrimination, victimisation and harassment in which Contractors, Clients, partners, candidates and Boden Group personnel are treated with dignity and respect.
- Periodically review our selection criteria and procedures to ensure that they remain compliant and maintain a system that ensures fairness.

- Distribute and continuously publicise our full Equality & Diversity Policy and distribute and publicise our Equality and Diversity Policy and relevant procedures to Contractors, Boden Group personnel, Clients, partners, visitors and candidates, as appropriate.
- Provide the facilities and opportunity for anyone who believes that they have been treated inequitably within the scope of our policy to raise the matter through the appropriate grievance or complaints procedure.
- Log all reported instances of harassment and take action to mitigate and minimize harassment and victimisation wherever possible.
- Ensure that Contractors and relevant Boden Group personnel understand that breaches of this policy will not be tolerated and may result in appropriate contractual, assignment or internal action and may lead to action under the relevant contractual, assignment or engagement arrangements.

Monitoring of equal opportunities

Boden Group aim to monitor and assess the EO Policy through a review of practices and appropriate action will be taken to improve our policy where necessary.

To ensure the EO policy is effective, detailed monitoring of applications is performed via a 'Diversity Monitoring Form'. This necessitates the collection of data regarding an applicant's ethnic origin, sex and disablement. This information is given voluntarily. The information will only be used for the monitoring of Equal Opportunities purposes and will be treated as confidential, however it may be used to collate company statistics required by relevant authorities, and personal identities will always be suppressed. The selection criteria of all applicants will proceed purely according to the merits and abilities to perform the tasks and duties required.

We recognise that it is in the best interests of Contractors, Clients and Boden Group to make effective use of relevant skills and experience. Contractors are encouraged to tell us about skills and knowledge that may make them particularly suitable for particular assignments or Client requirements.

Data Privacy Statement

Boden Group takes the protection of your data seriously and complies with the rules laid down under the General Data Protection Regulation (GDPR) released by the EU. This statement

details your rights as a data subject and gives contact details enabling you to exercise those rights should you wish to. It is further supported by our Privacy Notice found online here: <https://boden-group.co.uk/privacy-policy/>

Modern Slavery & Human Trafficking

Boden Group recognises that all businesses have an obligation to prevent slavery and human trafficking and will do all in its power to do this within its business and the supply chains through which it operates.

Modern slavery can take many forms including trafficking, forced labour, servitude and slavery. As a recruitment business, Boden Group takes its responsibilities in the supply of Contractors seriously and recognises the potential for recruitment supply chains to be targeted by traffickers and unlicensed gangmasters. Our personnel are expected to remain alert to signs of exploitation so that appropriate action can be taken promptly where concerns are identified.

Our supply chains include, but are not limited to, sourcing candidates for clients. This may involve the introduction by external agencies to Boden Group of candidates for onward supply to our clients. We expect our suppliers and potential suppliers to aim for high ethical standards and to operate in an ethical, legally compliant and professional manner. We also expect our suppliers to promote similar standards in their own supply chain.

Lone Worker Policy

A situation at work may arise where you are working alone. If this occurs, ensure you have a means of contact and make certain your mobile phone is within range. If you are in a building on your own, always lock the door to ensure

no one can enter without your knowledge. If you must leave the work premises, let someone know where you are going, how long you will be there and carry a reliable means of contact with you. You must notify the organisation as well as your agency that you are in a vulnerable environment. A Lone Worker assessment should be undertaken by the organisation you are working with to ensure you know the correct

procedure to follow. When working in the community you must complete the lone worker training module.

If you have any concerns, contact Boden Group 0121 702 1464 or your recruitment consultant.

Health and Safety Policy

Purpose of this policy

This policy covers all contractors who are placed via Boden Group and is compliant under the Health & Safety at Work Act 1974

Responsibilities

Boden Group is responsible for

- Ensuring Policy is kept updated in line with any Health & Safety Executive requirements in all four countries of the United Kingdom.
- All contractors have access to this policy and are informed of any updates.
- Undertake health risk assessments as deemed necessary by Occupational Health Provider.
- Contractor responsibilities are to:
- Take reasonable care for the health and safety at work of yourself and any other people who might be affected by your acts or omissions.
- Co-operate with the organisation you are placed in and enable colleagues on duty with you to comply with statutory duties and requirements.
- Not intentionally or recklessly misuse anything provided in the interests of health, safety or welfare the Management of Health & Safety at Work Regulations 1992 further requires you to:
- Use any equipment, etc., provided in the interests of safety.
- Follow all health and safety instructions.
- Report anything you consider to be a danger.
- Report any shortcomings in the protection arrangements for health and safety client organisations are responsible for ensuring:
- Contractors are familiarised with their Health & Safety Policy as this can differ from each location.
- Ensure you receive an induction on first shift at a new placement, in your induction you should expect to receive information regarding procedures, locations of fire escapes, first aid contact person etc. If this is not provided you must request it from the person in charge of your shift/placement.

Right to Work Check Policy

All Contractors must complete an appropriate right to work in the UK check before commencing an assignment where such a check is required. Boden Group will use the applicable online, manual or digital process and retain evidence in accordance with legal and regulatory requirements.

Online Right to Work Check

In January 2019 the UK Government provided an online right to work check facility which can be accessed at <https://www.gov.uk/view-right-to-work>. The online checking service supports a right to work check in respect of individuals who hold:

- A biometric residence permit.

- A biometric residence card.
- Status under the EU Settlement Scheme (alternatively these individuals can continue to demonstrate their right to work by presenting their EU passport or ID card until the end of the implementation period for this scheme).

Whilst we will encourage use of the online checking process, individuals unable or unwilling to facilitate this will continue to be subject to the manual checking process detailed hereafter.

Where the Home Office online right to work service is used, the Contractor must first access their own right to work record and provide the required share code and date of birth so that Boden Group can complete the check.

Boden Group use the “employer” part of the service as this activates a Home Office audit record of online checks conducted by employers. To conduct an online right to work check, we will:

1. Log onto the Home Office online portal at <https://www.gov.uk/view-right-to-work> and enter the share code and candidate’s date of birth.
2. Check that photograph shown is a true likeness of the individual presenting themselves for work. This part of the check must take place face-to-face with the applicant.
3. Retain a clear copy of the profile page confirming the individual’s right to work generated by the portal. This page includes the individual’s photograph and the date on which the check was carried out. This page can either be printed out or saved as a PDF for direct upload to our recruitment software.

Manual Right to Work Check

To conduct a manual right to work check, we will:

4. Obtain one or a combination of original document(s) as specified in List A or List B as

Detailed here: <https://www.gov.uk/government/publications/right-to-work-checklist/employers-right-to-work-checklist-accessible-version>

5. Verify the documents are genuine and that the applicant is the rightful owner of the

document(s) by checking that photographs are clear and look like the holder and the date of birth is consistent with their appearance and identity documentation. The name and date of birth must also be consistent across all documentation. Right to work documentation must always be checked in the presence of the holder.

6. Check the document(s) containing an expiry date are current. An indefinite leave to

remain stamp in an expired passport may not be accepted and the holder must obtain and provide a current document such as a Biometric Residence Permit instead.

7. Check Government stamps and endorsements to ensure that the holder is allowed to

do the type of work for which they are applying. Work permits must be confirmed by contacting the appropriate embassy or consulate.

8. In the case of a passport, a copy must be made of any page which shows the expiry

date, nationality, date of birth, signature, leave expiry date, biometric details and photograph as well as any page which indicates the holder has entitlement to enter or remain in the UK and undertake the work in question. All other documents must be copied in their entirety including both sides of a Biometric Residence Permit and retained in line with the standard process for verifying documentation detailed above.

Digital Right to Work check

A digital right to work check is conducted using Identity Document Validation Technology (IDTV) via the services of a provider (British and Irish citizens only).

A link for digital RTW check, along with instructions will be sent to you via one of our trusted suppliers Trust ID or Yoti.

Follow-up Checks

In some circumstances we will be required to carry out a follow-up check. There are two categories of documentation that can be provided:

9. Continuous excuse – this is where an individual can provide one or a combination of

documents from List A and there are no restrictions on their right to work in the UK. Once the checking process has been completed and a copy of the document(s) have been retained, the procedure is complete, and no further checks are required.

10. Time-limited excuse – this is where an individual can provide one or a combination of

documents from List B and there are time limits and restrictions on their right to work in the UK. The individual's right to work in the UK will end when their visa or other right to work documentation expires. Restrictions may relate to the type of work the individual can do and/or the number of hours they can work. In such cases a repeat check must be scheduled prior to the expiry date if the individual is to continue working. The frequency of the follow up depends which list the documents presented are from as shown below.

Document Type	Excuse Type	Frequency of Checks
List A	Continuous	Before start of assignment or employment. No further right to work checks are required.
List B	Group 1	Before start of assignment or employment and again when permission expires.
List B	Group 2	Before employment starts and again after 6 months.

During the right to work check process, we will also follow the steps identified in our Modern Slavery & Human Trafficking Policy to reduce risks in this area.

Reference Request Policy

Our Registration Form includes a section relating to referencing and the candidate is requested to consent to references being shared with the client or any employer to support quality and audit. At least two references (and possibly many more to fully cover the most recent five year's continuous employment) are taken up after the interview and prior to assignment / placement including the most recent employer / assignment. This may be reduced to a single reference, if the candidate has been with one employer for the most recent five full years and all requested details have been confirmed in the reference by the previous employer. If there are gaps in employment / training, we will take up further personal / character references to cover the full five-year period.

There may be occasions when it is deemed necessary to seek references prior to interview (e.g. when making a senior appointment), and in such cases, the candidate will be advised of this in writing, and consent confirmed, prior to the references being taken up.

Written references are requested using the appropriate referencing template and will confirm:

- Where the individual has been employed / studied;
- Dates employed / studied;
- Position held / course undertaken; and
- Recent or ongoing disciplinary action or referrals.

References will be taken up from the Compliance/HR Department of previous employers and should additional information be required then this may be requested from the candidate's Line Manager via the HR contact.

The organisation providing the reference and contact details of the referee will be checked to ensure it is a bona fide business using the phone book, internet or other appropriate means before the reference request is sent. References must be sent to a verified email address that is verified to the relevant employer.

References must not be sent to the referee's private email address (e.g. yahoo, Hotmail, Gmail, Live etc).

Any offer of assignment may be withdrawn if it subsequently becomes apparent that a Contractor has knowingly withheld material information or provided misleading or false information in relation to their work history, references or compliance information.

Returned references will be checked prior to assignment / placement to ensure they cover the most recent three-year period and where appropriate, that all gaps in employment over two weeks are fully explained. Information contained in references will be cross-referenced with the application form, interview and other information obtained from the candidate during the recruitment process to ensure they are satisfactory and consistent.

References must be in writing via post, fax, email or via our recruitment software and have some form of organisational identification on them such as being on company letterhead or being received together with a compliment slip. Emailed references must be from a business email address and will not be accepted if sent from a personal email address (e.g. Hotmail, Gmail, BTinternet etc). As a minimum references must include the referee's full name, any relevant professional body registration number, job title and name of the employing or training organisation together with a telephone number and business email address to enable them to be validated if necessary.

Should any negative information, discrepancies or contradictions be found in references received, we will seek a reasonable explanation, giving the applicant the opportunity to explain the situation. Additional references may be sought to help validate our recruitment decision.

Overseas Police checks

Boden Group may require a police certificate or certificate of good character from a Contractor where this is required by the Client, framework, role, sector or applicable compliance requirements, including where the Contractor has recently lived or worked overseas. Any required certificate must satisfy the applicable recency and suitability requirements before the assignment begins.

Overseas police certificates will be checked in the same way as other documentary evidence to verify that they are genuine and relate to the Contractor presenting them. Where required for the assignment, Boden Group will also undertake or obtain the relevant UK criminal record or regulated activity checks.

Where a Contractor has lived or worked outside the UK, Boden Group may require evidence of an overseas police certificate or equivalent from the relevant country or countries together with any DBS, AccessNI, PVG or other check required for the assignment.

- Ask them to provide evidence of police certificate or equivalent from the relevant country or countries; and

- Obtain a DBS / AccessNI disclosure or PVG scheme membership check as soon

as is reasonably practicable. This check requirement applies even if the individual states they have never lived or worked in the UK before.

The application process for overseas police checks varies from country to country and we will use the following guidance to ensure the correct criminal records check has been undertaken for overseas applicants prior to assignment:

<https://www.gov.uk/government/publications/criminal-records-checks-for-overseas-applicants>

Work health assessments will be conducted for NHS roles, and for other assignments where specific occupational health clearance is required, after a provisional assignment offer and before the Contractor starts. Any offer will remain subject to satisfactory completion of the applicable pre-assignment checks. Health clearance and immunisation requirements will be relevant to the duties of the assignment and applicable sector or Client guidance.

Where required for an assignment, the Contractor must hold the necessary Certificate of Fitness for Employment or equivalent occupational health clearance before commencement and throughout the period for which it is required. Evidence may be made available to the Client or relevant Authority for audit purposes where permitted and required.

Where annual reassessment is required, our systems will prompt us before the relevant occupational health clearance expires so that a new assessment can be arranged. A further assessment may also be required if a Contractor moves to an assignment or role with materially different duties or occupational health requirements.

Contractors should be aware that a Client or relevant Authority may request evidence of occupational health clearance or immunisation records where this is lawful and necessary for the assignment, and may require an additional assessment in accordance with applicable requirements.

Occupational health information relating to a Contractor, including relevant clearance, immunisation, monitoring and referral information, will be recorded and retained in accordance with applicable data protection requirements and Boden Group's data retention arrangements.

Induction policy

It is easy to forget how difficult the first day in a new job can be. Agency staff may experience several first days each month, so an effective induction is important for safety, clarity, inclusion and performance.

Purpose

It is our aim to supply staff who are qualified, suitable for the placement and able to work effectively in the assignment. An effective induction and appropriate support from the client are vital parts of this process.

Scope

The policy applies to all staff regardless of grade or profession and aims to ensure that agency staff induction is carried out as swiftly and consistently as possible.

Procedure

When you arrive at a department for the first time, introduce and identify yourself to the person in charge. You should receive an induction before commencing work. If an induction is refused or materially incomplete, contact Boden Group so that this can be addressed.

As a minimum, a local induction should cover:

- Orientation to the area and relevant documentation.
- Key policies and protocols specific to the department.
- Fire procedures, including fire exits, extinguishers and any Personal Emergency Evacuation Plan where applicable.
- Expectations and limitations of your role.
- Familiarisation with relevant equipment.
- Location of local policies and procedures.
- Dignity at work, sexual harassment and expected standards of behaviour.
- How to report bullying, harassment or sexual harassment to both the Client organisation and Boden Group, including concerns involving a Client employee, customer, patient, service user, other contractor or third party. An alternative reporting route where the usual contact is implicated will be provided. Where applicable, Contractors should also be informed of the Client's local reporting arrangements. Boden Group will retain appropriate evidence that relevant handbook and reporting information has been issued or acknowledged.

Where an induction checklist is used, ensure it is completed, signed and dated and retain a copy where this is provided to you.

Mandatory Training

As part of your engagement with a Public Sector organisation, it may be a contractual requirement to complete mandatory training. Requirements may differ between organisations and assignments.

You will receive reminders when compliance updates, appraisals or mandatory training are due from the Compliance Team or your Recruitment Consultant. Where completion is a condition of an assignment, you may not be able to work until the required evidence has been provided.

Generic mandatory training may include, as applicable to the assignment:

- Conflict Resolution.
- Equality, Diversity and Human Rights.
- Prevention of Sexual Harassment, including expected conduct, third-party harassment, reporting routes, bystander responsibilities and protection from victimisation.
- Fire Safety.
- Health, Safety and Welfare.
- Infection Prevention and Control.
- Information Governance and Data Security.
- Moving and Handling.
- Preventing Radicalisation.
- Resuscitation.
- Safeguarding Adults.
- Safeguarding Children.
- Counter Fraud.

Boden Group will provide appropriate sexual harassment prevention information and training to relevant Boden personnel and Contractors, having regard to their responsibilities, engagement arrangements and the risks associated with assignments. Managers, recruiters and other staff who receive concerns or manage assignments may receive additional training on handling disclosures, escalation, investigation, confidentiality, victimisation, client or third-party incidents and preventative action. Any other mandatory training required by the Participating Authority, relevant Professional Association or Regulatory Body, or under current or future regulatory or legislative requirements, may also be required.

Where sexual harassment prevention training is a requirement of an assignment, the Contractor must provide evidence of completion before commencement or within an expressly approved induction period, as applicable. Boden Group personnel responsible for Contractor management, Client relationships, receiving complaints or investigating concerns will receive additional role-appropriate training.

Training needs will be reviewed periodically and refresher training will be provided where appropriate.

Agency Worker Regulations

The Agency Workers Regulations derive from European legislation designed to give temporary agency workers parity in pay and employment conditions as they would have been entitled to had they been recruited by the client directly to do the same job.

The regulations were ushered through Parliament during the last administration under a Labour Government. They were strengthened by Union backing to protect a vulnerable work force and as such were initially meant to apply to the lower end of the agency worker market. Unfortunately, the legislation does not actually set out to do this and demonstrates a 'one-size-fits-all' approach, thus applying to all agency workers irrespective of occupation, status, qualifications and pay levels.

With effect from 1st October 2011, the regulations clearly define what is required by all parties in the supply chain for agency workers to ensure equal pay, equal entitlements, and equal treatment after a specific qualifying period. Subsequent rulings have dictated to the masses that there will be no changes to the regulations as originally passed

and the emergence of the formal guidance notes in May 2011 has shed some positive light on the overall part they play in the execution of the regulations.

Day One Rights

Broadly taken from the regulations, day one rights are the sole responsibility of the client and MUST include:

- Equal treatment - access to amenities and facilities that are generally utilised by full

time employees of the client, such as: canteens, lockers, uniforms, car parking, memberships and all other generally accepted items that are not given as a result of long service or loyalty.

- Equal Opportunity - access to all job vacancies that are 'relevant' to the agency worker,

giving them the chance to apply directly for a full-time or hired position. Typically to include: notice boards, intra net access, direct correspondence, email notification of posts and/or any other form of making the agency worker aware.

Whilst day one rights are the responsibility of the client alone, we feel it good practice that all agency businesses put in place standard guidelines to make sure all clients are aware of these rules.

Rights After 'The Qualifying Period'

The Qualifying Period is denoted as being 12 weeks in the same or similar role with the client. This does not take into account any natural breaks during this time such as holidays, sickness, maternity and other statutory reasons whilst the clock for qualifying is paused. It is also prudent to note that the period is set out for a time worked with a particular client, meaning an agency worker could have already worked for the client before they join your business and therefore, may have qualified for equal treatment instantly.

The qualifying clock resets if there has been a break of more than 6 weeks from the previous client and where the agency worker has moved to a different client. It is extremely important to ascertain an agency worker's previous working history and to document these details before they start with your business - we aim to look back at a total of 6 month's history prior to them joining Boden Group. Multiple client arrangements performed at the same time are also a great cause for concern and monitoring.

What are the rights after 12 weeks?

The agency worker is entitled to the following equal rights after they have completed the required qualifying period and this is in direct relation to an individual performing the same or similar role with the client, who is employed directly or hired directly by the client:

Equal treatment

Once an agency worker has completed 12 weeks with the organisation in the same role, he/she will be entitled to the same basic working and employment conditions that would apply to employees or workers who have been directly recruited to the same job. This includes pay, duration of working time, rest periods and breaks, and annual leave.

Pay

All agency workers will be entitled to the same basic pay to which an employee or worker who has been directly recruited to the same job would be entitled. This includes pro-rated salary and additional risk payments for hazardous duties/overtime pay/unsocial-hours allowance/shift allowance/bonuses/commission. It does not include any bonus or reward given to employees or workers for a reason that is not directly attributable to the amount or quality of the work that they have done.

Annual leave

Agency workers will be entitled to the same paid annual leave to which an employee or worker who is recruited directly to the same job would be entitled. This leave entitlement will be pro-rated to the length of the assignment.

Working hours

Agency workers will work the same basic working hours as an employee or worker who is recruited directly to the same job. There may be circumstances in which agency workers will, if they wish, be able to opt out of the maximum 48-hour working week under the Working Time Regulations 1998. Any worker who has not signed the opt-out or who has revoked his/her opt-out will not be requested or permitted to work more than the maximum number of working hours permitted under the Working Time Regulations 1998.

Rest periods

Agency workers will be entitled to the same rest periods and breaks to which an employee or worker who is recruited directly to the same job would be entitled.

Night work

Agency workers will be entitled to the same arrangements for night work to which an employee or worker who is recruited directly to the same job would be entitled.

There are of course many determining factors relating to these rights and it is paramount that all eventualities and conditions are obtained from the client before the commencement of any assignment - all parties are responsible.

Guidance for working via Umbrella Company

Boden Group do not provide a PAYE option. You will be able to register with one of our preferred and vetted umbrella companies.

How an umbrella company works

An umbrella company is a business often used by recruitment agencies to pay contractors.

In most cases, the umbrella company employs you and pays your wages through PAYE. It does not find temporary work for you, this is done by the recruitment agency (also known as an employment business).

Although the umbrella company is your employer and will pay you, the work you carry out will be for one of the recruitment agency's clients.

More information available here: <https://www.gov.uk/guidance/working-through-an-umbrella-company>

Employment Agency Standards Inspectorate

Key Information Document

In line with Employment Agency Standards (EAS) Inspectorate, with effect from the 6th April 2020, as an employment business, Employment Agency must give all new agency workers a key information document (KID). The purpose is to give you a clear overview of some aspects of your contractual arrangements, including how your rate of pay is affected by fees (if any) and statutory deductions. The content of the key information document includes details on your pay, tax, holiday entitlement and other benefits you have as a new agency worker.

A KID document has been sent to you along with this Handbook.

If you have any questions, please contact us at the relevant email address:

Compliance: compliance@boden-group.co.uk

Payroll & timesheets: timesheets@boden-group.co.uk

Timesheets

Following confirmation of your offer with Boden Group and successful completion of your onboarding, you will receive an email from our Compliance Team outlining the timesheet submission guidelines and payroll procedures relevant to your assignment.

This email will include a clear, step-by-step breakdown of the payroll process, including timesheet submission deadlines, approval requirements, and scheduled payment dates following approval.

Please note that timesheet deadlines and payment schedules may vary depending on the end client you are assigned to. The specific arrangements applicable to your assignment will be clearly detailed in your Assignment Schedule.

Payment

On receipt of a properly completed timesheet, Boden Group will process your pay as follows:

For time records approved by 12pm on Wednesday (excl. public holidays) payment will be made to the umbrella company by Thursday, for you to receive funds on Friday.

What is a properly completed timesheet?

A “timesheet” is an electronic record that you complete on Boden Timesheet Portal which subsequently submitted to the Client for authorisation.

Counter-fraud declaration

I declare that the information provided on my timesheets is correct and that the hours detailed on the timesheet are not claimed elsewhere. I understand that knowingly providing false information may constitute a breach of my contractual or assignment obligations, may result in termination of the relevant engagement or assignment, and may give rise to civil recovery, regulatory referral or criminal proceedings where applicable. I consent to the disclosure of relevant information for the purposes of verification and the investigation, prevention, detection and prosecution of fraud, subject to applicable data protection requirements.

Contacts

Boden Group <https://boden-group.co.uk/> Unit 11 Quartz Point Business Park Coleshill, Birmingham, B46 3JL Tel: 0121 702 1464 timesheets@boden-group.co.uk compliance@boden-group.co.uk If you have any concerns around your wellbeing, safety or conduct within your placement please contact; kelsey@boden-group.co.uk