

## RIGHT TO WORK IN THE UK POLICY STATEMENT

J Coffey Construction Limited (Company Registration No. 29378886) must always check that all potential employees and subcontractors have the legal right to work in the UK. The aim of the Company is to ensure operatives and staff who we employ, and subcontractors present on our sites, have the right to work in the UK Under Section 15 of the **Immigration, Asylum and Nationality Act 2006** in the role for which they would be working.

Employers must carry out one of the prescribed checks before employment commences, as set out in guidance. This establishes a statutory excuse.

These checks are:

1. a manual right to work check
2. a right to work check using Identity Document Validation Technology (IDVT) through the services of an identity service provider (IDSP) for British passport and Irish passport or passport card holders.
3. a Home Office online right to work check

If doing the check in person, we will physically obtain documents from the Home Office's lists of acceptable options, either List A, or List B. The lists are available on the government website.

J Coffey's onboarding process includes an online submission by the worker of their identity documents and information needed to prove right to work (e.g. share code). This submission is then verified by an in person manual check when they first arrive at one of our sites.

### 1. Manual Check:

The following shall be checked:

1. photographs are consistent with each other across documents and with the person's appearance.
2. dates of birth are consistent across documents.
3. expiry dates for permission to be in the UK have not passed.
4. any work restrictions to determine if they are allowed to do the type of work on offer.
5. the documents are genuine, have not been tampered with and belong to the holder.
6. the reasons for any difference in names across documents can be explained by providing evidence such as an original marriage certificate, divorce decree absolute, or deed poll (you will need to keep a copy of supporting documents as well).

A copy shall be made of each document in a format which cannot be manually altered.

For passports we will copy any page with the document expiry date, the holder's nationality, date of birth, signature, immigration permission, expiry date, biometric details, photograph and any page containing information indicating the holder has an entitlement to enter or remain in the UK (visa or entry stamp) and undertake the work in question. For all other documents they will be copied in full. The date of the check will also be recorded.

2. J Coffey use the services of a certified IDSP to support our manual right to work checks. The IDSP provide the Compliant101 platform on which J Coffey conducts our checks. For British and Irish passport and Irish passport card holders we still also conduct manual checks on site in addition to receiving copies of documents through the online Compliant101 process.

### 3. Digital Checks:

J Coffey's online right to work portal (The Compliant101 Platform) allows individuals to submit their evidence of right to work, including share code (for individuals who do not hold List A identification) and photos taken live of themselves, and live-photo copies of their ID. The share code is used to generate a document from the Home Office portal showing proof of a digital right to work check by J Coffey Construction.

If on review the submitted ID documents are not sufficient then the worker is contacted to ask them to submit additional documents as evidence.

If the online right to work check is passed, then the individual is asked to come to site with the Identification documents that they used to complete the online step.

When the individual arrives at site there is then an in-person verification step which is a manual check. The right to work administrator on site compares the previous online submission with the documents and the individual in front of them to establish that the identity of the individual matches the documents supplied, that they are in control of their documents, that the documents are valid, and that these constitute right to work.

The right to work administrator takes a picture of the individual holding their ID. This is proof of a manual right to work check by J Coffey which is supported by the digitally submitted evidence. The date of the check is automatically recorded. The evidence of the manual check is review by the payroll team. If the evidence of the manual check is insufficient (e.g. a poor quality photo), then it needs to be resubmitted before the right to work is considered to be verified.

Only once an individual's right to work has been verified can they start work on our sites.

There may be projects where steps of this process cannot reasonably be followed due to restrictions on site. In these cases we will implement a process for checking right to work that gives us an equivalent level of confidence. Such sites would be lower risk due to the size of the labour force or additional checks carried out before a worker is eligible for work on the site (e.g. BPSS checks).

Records of right to work checks conducted by J Coffey are stored in a database provided by our IDSP partner. The copies of the right to work documents cannot manually be altered. This database is accessible to a restricted number of individuals within the company within the HR and payroll teams.

Company activities are varied through multiple disciplined areas such as: Structural Alterations, Sub & Superstructure works, Concrete & Builders work packages, Main Contracting and works on Infrastructure. We are committed to ensuring that there is no known illegal working within our packages of work or parts of our business. Our Right to Work Policy Statement demonstrates our commitment to following UK law on legal working. Our identity checks support our commitment to combatting Modern day slavery as explained in our Modern Day Slavery Policy Statement. As well as our Right to Work and Modern-Day Slavery Policy Statements, other associated policies we employ are our Equal Opportunities, Diversity & Inclusion Policy Statement, Ethical Policy Statement & Industrial Relations Policy Statements.

This Policy considers, and supports, the policies, procedures and requirements documented in our Integrated Management System, compliant with the requirements of ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018. The implementation and operation of this management system underlines our commitment to this policy statement. Formal procedures concerning checking individuals' right to work have been

established. Additional procedures ensure that this policy is understood and communicated to all levels of the company, and that it is regularly reviewed by the Directors to ensure its continuing suitability and relevance to the company activities.

The Company has achieved these aims by our initiative to identify and mitigate risk in the following ways (but not limited to): -

- Training staff and making them aware of the issues and risks associated with failure to conduct and retain proof of reasonable right to work checks.
- Undertaking audits of the right to work policies of our labour supply chain.
- Supplementing the checks of our labour supply chain with our own right to work checks when our labour supply chain send new individuals to work on our sites.
- Continually auditing & reviewing our practices for checking all employees are paid at least the minimum wage and have the right to work.
- Investment in PPAC Compliant101 right to work submission platform, including addition of a custom software development to the J Coffey build of the Compliant101 software allowing verification photos to prove manual checks were conducted on site.
- Maintaining PPAC, a certified IDSP, as our software platform and database provider.
- To allow our main clients to audit our business using the SEDEX audit format which we successfully passed.
- Increased Modern Day Slavery Audits of our suppliers and agencies providing operatives covering their right to work checking procedures and compliance with labour legislation.

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we have provided training to relevant members of staff and all Directors have been briefed on the subject.

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that right to work is checked and evidence of the checks retained in our business and supply chain:

- Completion of Audits by Directors, Managers, Safety Managers and Safety Advisors.
- Use of labour monitoring and payroll systems and the Compliant101 platform.
- Level of communication and personal contact with next link in the supply chain and their understanding of, and compliance with our expectations.

**This policy applies to all employees and other personnel engaged in J Coffey Construction operations:**

Signed: *Eddie Barrett* (Original Signed)

Date: 20/08/2024

Eddie Barrett

Group Managing Director

**On behalf of J. Coffey Construction**

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