



Date: November 2012

To: All NSI approved companies and applicants where security screening to BS 7858 is referenced as part of the scheme criteria

TECHNICAL BULLETIN No. 0022

Guidance on the implementation of BS 7858:2012 British Standard Code of Practice for Security screening of individuals employed in a security environment (Supersedes BS 7858:2006+A2:2009)

The latest edition of BS 7858 shows a publication date of October 2012 and the Foreword shows 1 May 2013 as the date the new Standard comes into effect. This six month lead in time is intended to give organizations a suitable period to adapt their processes and procedures to comply with BS 7858:2012 by 1 May 2013 at the latest.

BS 7858:2012 (the “new BS”) is now available through licensed outlets including NSI who can supply copies at a discounted rate. The new BS is also included in the Standards Subscription Service available on-line via the NSI website (www.nsi.org.uk).

We will now apply the new BS to all organizations that wish to obtain or maintain NSI approval for any scheme that includes in the referenced criteria: ‘Compliance with BS 7858 for security screening of individuals employed in a security environment’. Even though the new BS shows an effective date of 1 May 2013, you may elect to apply the new BS with immediate effect, subject to the additional clarifications and guidance within this Technical Bulletin.

We will assess applicant companies against the new BS with immediate effect and you will need to address satisfactorily any variations from the new BS before we will grant approval.

Existing NSI approved companies have until 1 May 2013 to comply with the new BS and certification to BS 7858:2006+A1:2009 (the “old BS”) may continue up to 30 April 2013. In the interim we will raise Improvement Observation Reports for any of the requirements within the new BS that are not fully satisfied. If you do not address satisfactorily any Improvement Observations against the new BS edition by 30 April 2013 then this will impact on the on-going approval decision.

Where a dated reference to BS 7858 is on existing NSI Certificates of Approval, we will only update the reference to the 2012 edition when we are satisfied that you have demonstrated compliance with the same.

NOTE REGARDING THE STATUS OF THE NEW BS: Although issued by the British Standards Institution (BSI) as a Code of Practice, it is important to note that we regard compliance with the recommendations given in the new BS as mandatory for all organizations wishing to obtain or maintain an NSI approval; subject to any additional clarifications and guidance included within this Technical Bulletin or issued subsequently. **Therefore you must regard the recommendations given in the new BS as requirements of the relevant NSI approval schemes.**

SUMMARY OF THE KEY POINTS AND CHANGES

This summary identifies key points and main changes, but does not cover all the changes. Please refer to the new BS and the rest of this Technical Bulletin for full details of the changes.

Key points and changes

- 1) The security screening period remains 5 years (see 2.12) (unless lengthened to account for contractual or legislative considerations and/or specific industry standards).
- 2) The security screening period goes back to the age of 16 (see 2.12), instead of the age of 12 (if this date is more recent than the start of the 5 year security screening period).
- 3) For security screening purposes, the individual's personal details (submitted at the application) must include aliases, date of birth, National Insurance number, evidence of right to work in the UK, and SIA licence number (if held) (see 4.3.3 a)).
- 4) The number of character references has been reduced from two to one (see 4.3.3 c)) (except where additional character references are required to cover "gaps").
- 5) Character referees must have known the individual being security screened for a minimum of two years immediately prior to the start of security screening (see 4.3.3 c)).
- 6) The security screening forms must state that character references must not be obtained from previous employers, relatives (by blood or by marriage) and/or persons residing at the same address as the individual (see 4.3.3 c)).
- 7) In addition to all bankruptcy proceedings and court judgments (including satisfied), the individual must supply details of all financial judgements made against them in the civil court and any individual voluntary arrangements (IVAs) with creditors from the previous 6 years (see 4.3.3 e)).
- 8) If a SIA licence is held, the organization must see the original licence and verify it against the public register of licence holders. The document details must be cross-checked against other information provided by the individual (see 4.4 c)).
- 9) If a SIA licence is not held, the organization must be able to demonstrate that they have taken necessary steps to confirm the identity of the individual. A copy of the

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document(s) produced must be retained in the screening file together with details of who examined and copied the original document and evidence of any additional electronic check(s). Details within the document(s) must be cross-checked against other information provided by the individual (see 4.4 c)).

- 10) The individual's public financial information must be obtained as part of the preliminary checks instead of being verified later as part of completion of security screening (see 4.4 e)).
- 11) If an individual has opted out of appearing on the electoral roll, other forms of evidence such as recent utility bills, bank statements, etc. must be requested to confirm the individual's current address of residence (see 4.4 e)).
- 12) The threshold for Executive sign-off of single or multiple CCJs has been raised from £5,000 to £10,000 (see 4.4 e)).
- 13) For some contracts (for example sites that are potential terrorist targets) organizations may consider checking the consolidated list of financial sanctions targets in the UK.
- 14) The security screening period for the purposes of limited security screening has been reduced from 5 years to 3 years (see 4.5.2 a)).
- 15) Where an individual is offered conditional employment following limited security screening but before full security screening has been completed, the terms and conditions of their employment should clearly state that confirmed employment is subject to satisfactory completion of full security screening within the period allowed and that conditional employment will end if full security screening is not completed satisfactorily within the time period allowed (see 4.5.2 b)).
- 16) The time periods for completing full security screening have not changed (12 weeks for five year screening, 16 weeks for longer periods). However an Executive can extend the security screening period by up to a maximum of 4 weeks subject to certain requirements (see 4.6).
- 17) Periods of extended travel abroad (longer than 31 days) must now be verified as part of completion of screening (see 4.7 f).
- 18) Where there are "gaps" in the record of career and history, the screening officer must now seek alternative evidence to verify the duration and the reasons for the incomplete record, as well as obtaining independent confirmation by a character reference having knowledge of the individual during the gap period in question (see 4.7 g).
- 19) With regard to ancillary staff, the organization should have in place procedures which ensure that individuals who have not been security screened are restricted from having access to sensitive information, assets or equipment (see 5).
- 20) A model application form has been included in Annex A (see Form 5A) and there is also a model authorisation and compliance form (see Form 5B) to replace the old Form 5.

THE SECURITY SCREENING PROCESS

A flow chart of the security screening process is given in **Annex 1** to this Technical Bulletin.

The security screening process is similar to before under the old BS:

- a) It is preferable to complete full security screening before employing an individual (as this minimises the risk and may indeed be appropriate for high risk environments and/or be required by insurers in some cases).
- b) The organization has the discretion, otherwise, to offer conditional employment (formerly called provisional employment) before full security screening is completed.

In relation to b) immediately above, the organization must not make an offer of conditional employment unless (see 4.5.1 of the new BS):

- a) the level of risk in the intended employment has been considered and is acceptable; and
- b) preliminary checks (see 4.4 of the new BS) have been completed satisfactorily; and
- c) limited security screening (see 4.5.2 of the new BS) has been completed satisfactorily.

Conditional employment must end if full security screening is not completed satisfactorily within the time period allowed (see 4.5.1 of the new BS).

An organization must not make an offer of confirmed employment unless full security screening has been completed satisfactorily (see last paragraph of 4.7 of the new BS).

The checks needed at the start of security screening, before any offer of employment can be made, have been strengthened (see 4.4 preliminary checks). On the other hand, the period covered by limited security screening has been reduced from 5 years to 3 years and only 1 character reference is needed instead of 2 (unless more character references are needed to cover "gaps").

SUMMARY OF KEY CHANGES (Highlighted against the clauses of the new Standard)

Comments against each clause consist of a summary of the changes when compared with the corresponding clause within BS 7858:2006+A2:2009 (the "old BS").

Where the actual wording is quoted it is reproduced in bold text.

Where it is considered relevant to further clarify the specified requirement, additional guidance is included in italics.

It is not our intent to impose our recommended methods of compliance with specified requirements to the exclusion of others. We will give full consideration to any alternative methods of achieving compliance with specified requirements, provided they can be justified to our satisfaction.

1 SCOPE

The wording of the scope clause has been altered as follows:

This British Standard gives recommendations for the security screening of individuals to be employed in an environment where the security and/or safety of people, goods **and services, personal data** or property is a requirement of the employing organization's operations and/or where such security screening is in the public **and/or corporate interest**.

NOTE 1 "Property" includes intellectual and physical property **as well as cash and valuables**.

NOTE 2 See Home Affairs Committee First Report: The Private Security Industry Volume 1 [1].

NOTE 3 Some insurers require BS 7858 as a part of the policy conditions and may have additional requirements for screening, e.g. a longer security screening period.

This British Standard applies equally to all individuals in relevant employment (see 2.8), including full-time and part-time employees, **sole traders, partnerships**, temporary and permanent employees, and to all levels of seniority, including directors. **The objective of security screening is to obtain sufficient information to enable organizations to make an informed decision on employing an individual in a security environment.**

The changes to the first paragraph serve to widen the scope slightly. However, we do not think that this will materially affect your application of BS 7858.

The first sentence of the last (second) paragraph is taken from 3.8 of the old BS and has been adapted to show clearly that sole traders and partners within organizations need to be security screened. This does not represent a change to our existing practices.

The second sentence of the last paragraph about the objective of security screening is relevant to the first paragraph of clause 3 (risk management), which states:

The organization should not employ individuals whose career or history indicates that they would be unsuitable for the role, given that such employment might allow opportunities for illicit personal gain, or the possibilities of being compromised, or opportunities for creating any other breaches of security.

2 TERMS AND DEFINITIONS

The definition called "**provisional employment**" (in the old BS) has been changed to "**conditional employment**" (in the new BS). The new definition reads as follows:

2.2 conditional employment

period of employment during which security screening is continuing

NOTE Successful completion of security screening is one criterion upon which the decision to grant confirmed employment is based.

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The words removed from the definition of provisional employment are “initial” (in relation to period) and “for a new individual” (in relation to employment). We do not think that these changes are significant.

It is preferable for you to change all of your documentation so as to replace “provisional employment” with “conditional employment” as this will avoid ambiguity in relation to applying the new BS. If you choose to continue to use the term “provisional employment” then you must ensure nevertheless that you follow all of the provisions of the new BS that relate to “conditional employment”.

There are several new definitions in the new BS that serve to clarify the meaning of some of the terms already used in the old BS as well as some new terms (for example “screening officer” and “wet signature”) as follows:

- 2.4 executive**
- 2.5 individual**
- 2.6 limited security screening**
- 2.10 screening officer**
- 2.11 security screening forms**
- 2.13 subcontractor**
- 2.14 wet signature**

Please refer to the new BS for the wording of these definitions.

The definition of “organization” has been altered as follows:

- 2.7 organization**
company (**including sole traders and partnerships**), establishment, government or local authority department, or other body employing **and/or contracting** individuals, **including volunteers**, in an environment where the security **and/or safety** of people, goods **and services**, **personal data** or property is a significant consideration.

This revised definition reinforces the point that sole traders and partners in an organization do need to be security screened, as well as contracted individuals (subcontractors). The inclusion of “volunteers” indicates that these individuals cannot be disregarded in relation to security screening if they are in relevant employment.

The definition of “relevant employment” (see 2.8 in the new BS) includes the addition of the words “**assets**” alongside “information and equipment” to emphasise the broad nature of things that need to be protected. In addition, Note 1 of 2.8 includes the addition of the words “**and/or employed directly as subcontractors**”.

The definition of “screening controller” has been altered as follows:

- 2.9 screening controller**
individual within an organization, responsible for **making sure that** the security screening **process is being carried out correctly**

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The organization's screening controller is responsible for making sure that security screening is carried out correctly. This is irrespective of whether the organization carries out security screening itself or whether the organization outsources security screening (see 8.3) to a third-party.

The definition of "security screening period" has been altered as follows:

2.12 security screening period

period of **not less than five** years immediately prior to the commencement of relevant employment or transfer to relevant employment, or back to the age of **16** if this date is more recent

The security screening period is unchanged (five years), but is now included in the definition. The age, in terms of how far to go back, is now 16 instead of 12, which is a reversion back to 16 as in earlier editions of the Standard.

In many countries, including the UK, 16 is the age when pupils can leave school if they want to (though this may be subject to future changes in legislation). People from some other countries may have left school earlier (such as age 12). You should go back to the age of 16 under normal circumstances, but you should consider going back further in relation to people whose compulsory education is likely to have ended at an earlier age.

3 RISK MANAGEMENT

The title of clause 3 has been changed from "General" to "Risk management". This reflects the fact that recruiting individuals to work in the security industry carries risk due to the nature of the work. This is shown in the first paragraph of clause 3, which states:

The organization should not employ individuals whose career or history indicates that they would be unsuitable for the role, given that such employment might allow opportunities for illicit personal gain, or the possibilities of being compromised, or opportunities for creating any other breaches of security.

This does not mean that someone having a criminal record is necessarily barred from employment. It all depends on the nature of the conviction and so on and whether or not the individual is suitable for the role given the opportunities for illicit personal gain and so on. However you must not employ individuals that would be unsuitable for the role based on the information gathered in during the security screening process.

We draw your attention to NOTE 3, which states:

In some cases, where the verification procedures cannot be completed satisfactorily, employment might be prevented, terminated or employment offer withdrawn. It is emphasized that this is not necessarily an indication of unsuitability; it might simply not have been possible to obtain the required positive evidence.

4 SECURITY SCREENING PROCESS

Clause 4, which sets out how security screening is to be carried out, has been substantially re-ordered and edited. To provide full details of the re-ordering and the editing would detract

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from the providing you with information about the key changes. Therefore this section of the Technical Bulletin focuses on the key changes.

For information and for ease of reference, the new structure of clause 4 is as follows:

- 4 Security screening process**
 - 4.1 Overview**
 - 4.2 Administration**
 - 4.3 Provision of information**
 - 4.3.1 General**
 - 4.3.2 Authorizations**
 - 4.3.3 Information required**
 - 4.3.4 Interview**
 - 4.4 Preliminary checks**
 - 4.5 Conditional employment**
 - 4.5.1 General**
 - 4.5.2 Limited security screening**
 - 4.6 Period allowed for completion of full security screening for individuals in conditional employment**
 - 4.7 Completion of screening (verification of information)**
 - 4.8 Review of the screening process**

A Table giving cross references for all clauses in the new and old BSs is given in **Annex 2** of this Technical Bulletin. Complete accuracy is not guaranteed.

4.1 Overview

We draw your attention to the last paragraph of 4.1 of the new BS:

The full security screening process should be carried out in accordance with this standard, regardless of an individual's previous employment, even if that employment was in a security environment.

4.2 Administration

This sub-clause of the new BS brings together matters relating to holding screening data confidentially, storing the data securely, **preventing unauthorised access** and preventing alteration.

Material taken from sub-clauses 4.1, 9.1 and 9.3 of the old BS can be found here.

4.3 Provision of information

4.3.1 General

There is nothing significantly new here.

4.3.2 Authorizations

The new BS strengthens the position regarding the need to inform the individual being security screened about how their information will be used and also with regard to obtaining authorization from the individual to process personal data and to contact third parties and so on. We draw your attention to Form 5B of the new BS and the first paragraph of 4.3.2:

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The security screening form should state that information is gathered to facilitate security screening in accordance with BS 7858, in order to determine whether individuals are suitable to be employed in a security environment.

The above information needs to be included in a form (see Form 5B under Data Protection Act 1998) that is provided to the individual being security screened.

The organization should make the individual aware at their interview or application, whichever is appropriate, that, with the individual's written permission, the organization is authorized to obtain the following in accordance with relevant legislation:

- a) **background career/history checks.** if permission to contact a current employer is withheld until an offer of employment is made, the individual should be informed that a condition of the offer of employment is that the offer can be withdrawn if the security screening is not concluded satisfactorily. The period of current employment should initially be verified by a personal reference and/or documents which substantiate employment;
- b) **a search of public record information.** e.g. County Court Judgments, bankruptcies, financial sanctions ¹⁾ and proof of identity and proof of address; and
- c) **a criminality check:** see 4.7j).

Form 5B should be used to obtain the relevant written permission.

In respect of financial sanctions (see b) immediately above), we draw your attention to NOTE 12 at the end of 4.4 (preliminary checks), which states:

For some contracts, e.g. potential terrorist targets, organizations may consider checking the Consolidated list of financial sanctions targets in the UK ⁴⁾.

⁴⁾ A consolidated list can be found at
http://www.hm-treasury.gov.uk/fin_sanctions_index.htm

We recommend (as does the Standard) that the consolidated list of financial sanctions targets should be consulted where there is a potential for terrorist attack on the relevant premises or sites (examples would include major sporting events, consulates, government buildings, military bases and so on). However we would not expect the list to be consulted every time security screening is being carried out.

We do however recommend that every organization should access the consolidated list of financial sanctions targets (on the relevant website) in order to know the content and to be better placed to determine how to use the list in relevant circumstances.

The organization should consider the portfolio of premises and sites being provided with security services, now and in the near future, and take into account the work that an individual being security screened might be likely to be asked to carry out in relation to these premises and sites.

4.3.3 Information required

The information required in 4.3.3 is needed for the security screening of all individuals as part of the preliminary checks (see 4.4 b)).

a) The individual's personal details including:

- 1) full name, including forename(s) and surname/family name(s);**
- 2) other and/or previous forename(s) and surname/family name(s) used during the security screening period;**
- 3) aliases, i.e. any name(s) used in addition to current or previous name(s) during the security screening period;**
- 4) full address history, including "from" and "to" dates, for the past five years;**
- 5) date of birth;**
- 6) National Insurance number;**
- 7) evidence of right to work in the UK ²⁾;**
- 8) SIA licence number and expiry date (if held).**

²⁾ See www.direct.gov.uk/en/Employment/Understandingyourworkstatus and www.ukba.homeoffice.gov.uk/visas-immigration/working.

Your present application forms are gathering most of these personal details already. However, we draw your attention to items 3), 4), 5), 6), 7) and 8).

Although there is a restriction on age discrimination in the UK, which may lead to an individual's date of birth not being requested as part of normal recruitment practices, when security screening is carried out there is a need to verify the identity of the individual and the date of birth is likely to appear in certain documents used for such verification. In addition, security screening calls for an interview (see 4.3.4). Therefore it is almost inevitable that the age of the individual will become known to the organization.

b) Details of the individual's education, employment, periods of self-employment (see 4.7), unemployment and gaps in employment (including career breaks, etc.) throughout the security screening period.

There are no significant changes in relation to b) immediately above.

c) The name of one referee, with personal knowledge of the individual, from whom a written character reference should be obtained.

The security screening form(s) should state that the individual(s) providing character references will be asked to confirm the nature of their relationship with the individual being security screened, and that they have known the individual for a minimum of two years immediately prior to the start of security screening. The security screening form(s) should also state that character references should not be obtained from previous employers, relatives (by blood or by marriage) and/or persons residing at the same address as the individual.

The main change here is the reduction from TWO character references to ONE (which is counterbalanced by the additional preliminary checks (see 4.4)).

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Form 5A (application form) includes relevant details about personal/character references.

Another change is the statement that character references should not be obtained from previous employers (see elsewhere in the new BS for example 4.5.2). This stems from the fact that many employing organizations will not confirm anything other than factual information such as employment dates and positions held. Nevertheless there are circumstances where a useful reference can be obtained from someone who knew the individual from previous employment and we will accept these kinds of references provided they add value to the screening process and are not obtained on a regular or routine basis.

- d) Details of all cautions or convictions for criminal offences, including motoring offences and pending actions, subject to the provisions of the Rehabilitation of Offenders Act 1974 [6].**

There are no significant changes in relation to d) immediately above.

- e) Details of all bankruptcy proceedings and court judgments (including satisfied), financial judgments in the civil court made against the individual and individual voluntary arrangements with creditors from the previous six years.**

The changes in relation to e) immediately above are shown in bold type. There is now a need to check for financial judgments against the individual in the civil court and IVA arrangements with creditors.

- f) An acknowledgement that misrepresentation, or failure to disclose material facts, either during application or throughout employment may constitute grounds for withdrawal of an employment offer or termination of employment and/or legal action.**

There are no significant changes in relation to f) immediately above apart from the editorial re-wording shown in bold typeface.

- g) A statement, in writing, authorizing the organization to approach current and former employers, government departments, individuals providing character references, etc. for verification of a continuous record of their career and history.**

There are no significant changes in relation to g) immediately above. Note 3 in the Standard indicates that wet signatures may be required in some circumstances.

- h) A declaration signed by the individual which acknowledges that employment is subject to satisfactory screening, that the individual consents to being screened and will provide information as required, that information provided is correct, and that any false statements or omissions could lead to termination of employment (a suitable example is provided in Annex A, Form 5B).**

Item h) is similar to the first paragraph of 4.3 of the old BS. However the requirements associated with the declaration are stronger and Form 5B in the new BS (or similar) should be used.

4.3.4 Interview

Organizations should interview the individual before any offer of employment is made.

NOTE It is preferable that interviews are carried out with the individual physically present. However, if a physical meeting is not possible at the interview stage then attention is drawn to 4.4c).

There must be an interview before any offer of employment (conditional or confirmed) is made. The Note indicates that a physical meeting (with people in the same room) is preferable, but acknowledges that this might not be possible in all cases. For example the interview could take place using a Voice-over-Internet Protocol (VoIP) service with video from webcams, or the interview could take place over the telephone.

Clearly a physical meeting is a very positive way of verifying the individual. In addition, it provides an opportunity to assess the individual's physical ability to do the job (see 5.3.3 of BS 7499:2007 for example) including whether or not the individual is colour blind, which would be important for a job involving electrical wiring.

The Note draws attention to 4.4c), which is about the importance of verifying the individual's identity. This is saying that if a physical meeting does not occur then the organization must put emphasis on positively verifying identity by obtaining and using photographic documentation (for example passport or photo identification driver's licence) to validate the identity of the individual with cross-matching over different photographic images.

Our view is that a physical meeting with the individual should be the norm and that there is a significant risk (unless the individual is already well-known to the organization from previous contact) in not doing so. Therefore if non-physical interviews take place we expect them to be in limited cases and we expect organizations to be able to show how they reached conclusive proof of identity without a physical meeting at interview stage.

4.4 Preliminary checks

These need to be carried out for every individual being security screened.

- a) Establishment of a security screening file in accordance with 4.2 a)
- b) All information requested in accordance with 4.3.3 (information required) has been supplied

This includes a fully completed application form and a full review of the information provided to confirm that the individual is likely to complete (unlikely to fail) security screening.

- c) Confirmation of identity including verification of documents

Wherever possible, the supporting documentation should be photographic i.e. passport or photo identification drivers licence. Verification should include visual inspection of original documents and retention of a copy. The visual inspection should compare details within the document against the physically present individual and a check for signs of tampering or alteration.

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Organizations should also carry out verification checks according to the following circumstances:

- 1) Individual holding a valid and current SIA licence

The organization should see the original licence and verify it against the public register of licence holders. The document details should be cross-checked against other information provided by the individual.

A copy of the public register search result should be retained on file.

- 2) Individual not holding a valid and current SIA licence

The organization should be able to demonstrate that they have taken necessary steps to confirm the identity of the individual.

NOTE 6 Additional electronic verification may be undertaken for example a passport can have its Machine Readable Zone (MRZ) verified by using a passport scanner or using an online service or using a third party organization. Third parties may also be able to carry out checks on other types of documents to provide further verification where required by the organization.

Electronic verification is useful and should be used, where possible, to confirm identity, particularly where there may be some doubt as to the identity of the individual being security screened. However, it is not a requirement for all organizations to have a scanner to read the Machine Readable Zone (MRZ) of a passport.

A copy of the document(s) produced should be retained in the screening file together with details of who examined and copied the original document and evidence of any additional electronic check(s). Details within the document(s) should be cross-checked against other information provided by the individual.

- d) Confirmation of current address of residence: the documents that should be presented are listed on the SIA website (<http://www.sia.homeoffice.gov.uk/>) and conform to the SIA requirements for licensing.

Whilst the SIA confirms the address of residence when processing the licence application, an individual can change their address after the licence has been issued. Therefore the SIA licence does not confirm the current address of residence.

Copies of the documents should be retained in the screening file, **with details of who examined and copied the original document.**

Any documents presented to establish proof of address of residence should be checked for authenticity.

The changes here are shown in bold typeface, as well as the fact that the current address of residence needs to be confirmed independently of the individual holding a SIA licence.

- e) The individual's public financial information

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The requirement for the organization to establish these details by direct reference through a credit reference agency or its agent is the same as 4.5 g) of the old BS except for:

- 1) **confirmation that the individual is listed on the electoral roll;**
- 2) **if not listed on the electoral roll then confirmation that the individual is known at the current address of residence;**
- 3) **linked postal address for the previous five years should also be searched to ensure no adverse information is listed;**
- 4) **county court judgments (CCJs) including IVAs.**

An individual's public financial information is not a credit check.

If an individual has opted out of appearing on the electoral roll, other forms of evidence such as recent utility bills, bank statements, etc. should be requested to confirm the individual's current address of residence.

If a concern appears during the search, the individual should be invited by the organization to make representation about the concern. If the organization is satisfied with the individual's representation and the organization is satisfied that the individual's financial history does not constitute a risk as described in paragraph one of Clause 3, then the following should apply.

The three circumstances (single or multiple CCJ(s), individual is bankrupt, individual is a director of another organization) whereby an executive of the organization can sign to accept the risk are the same as in 4.5 g) of the old BS except that the threshold for signing off single or multiple CCJ(s) has been raised from £5,000 to £10,000. Each case should be considered on its merits having due regard to the risk of employing the individual in relevant employment.

4.5 Conditional employment

4.5.1 General

NOTE *Completing full security screening before employing an individual is preferable.*

This is a little stronger than the wording of the first paragraph 4.7.1 of the old BS, which stated that employment may commence after completion of limited security screening "at the discretion of the organisation". This is because the new BS requires the risk to be taken into account.

An organization should not make an offer of conditional employment unless:

- a) **the level of risk in the intended employment has been considered and is acceptable;**

The organisation should consider any contractual obligations (for example from the customer and/or the customer's insurer) and any particular security risks associated with the kind of work that the individual being security screened will be tasked to do. We will regard the authorization to offer conditional employment as acceptance of the risk.

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b) preliminary checks (4.4) have been completed satisfactorily; and

The preliminary checks might in some cases lead to failure of the security screening process and to no offer of employment at all.

c) limited security screening (4.5.2) has been completed satisfactorily.

Limited security screening might in some cases lead to failure of the security screening process and to no offer of employment at all.

Conditional employment should end if full security screening is not completed satisfactorily within the time period allowed.

Conditional employment (where offered) is subject to time restrictions as detailed in 4.6 of the new BS.

4.5.2 Limited security screening

In addition to the preliminary checks (4.4), the organization should obtain the following for each individual being security screened.

- a) Confirmation of a continuous record of career and history (see 4.7) for a minimum period of **three** years immediately prior to the date of application (or back to the age of **16** if this date is more recent).

The changes here are 3 years and back to the age of 16.

- b) One character reference, which, at the discretion of the organization, can be an oral character reference. **A character reference should not be obtained from previous employers, relatives (by blood or by marriage) and/or persons residing at the same address as the individual.** It is emphasized that oral procedures do not provide a substitute for a written reference. The character reference should cover a minimum period of **two years immediately prior to the date of application** and should be subject to the following.

The main changes here are not obtaining character references from previous employers and the reference covering 2 years immediately prior to the date of application. The conditions attached to obtaining the reference are very similar to those in the old BS.

Where an individual is offered conditional employment following limited security screening but before full security screening has been completed, **the terms and conditions of their employment should clearly state that confirmed employment is subject to satisfactory completion of full security screening within the period allowed (see 4.6) and that conditional employment will end if full security screening is not completed satisfactorily within the time period allowed.**

The main change here is in respect of the terms and conditions of the individual's conditional employment with the organization, which must be clearly stated.

4.6 Period allowed for completion of full security screening for individuals in conditional employment

There are no changes to the normal periods allowed for completion of full security screening, which are:

- i) For 5 year full security screening, not later than 12 weeks after conditional employment has commenced.
- ii) For a longer period (such as 10 years), not later than 16 weeks after conditional employment has commenced.

However:

Cases extending beyond the maximum (12 weeks or 16 weeks) may be extended by a maximum of 4 weeks subject to evidence that written requests to verify information supplied have been made and subject to approval by an Executive. The decision to extend should be recorded on the Executive Acceptance of Risk form (Annex A, Form 7) which should be retained and easily accessible on request. Where screening has not been completed successfully, an individual should not continue in relevant employment after expiry of the period allowed for security screening.

The Executive must make sure that the screening controller/officer has made written requests to verify information supplied by the individual (for example requests for references and/or confirmation of employment dates and so on). Normally we would expect to see evidence of a degree of chasing for replies as well.

All decisions to extend the period of security screening must be recorded on the Executive Acceptance of Risk Form (Form 7) and the records must be easily accessible on request (for example for auditing purposes). Such extensions should be the exception rather than the rule.

Executive decisions to extend the security screening period should not be used to cover over inefficiency within the security screening department of the organization (and/or under resourcing of said department) and we will look carefully at the situation if we find excessive use of the facility to extend.

4.7 Completion of screening (verification of information)

The first paragraph of 4.7 states:

Verification of information should be completed within the period allowed for completion of security screening (see 4.6).

The second paragraph of 4.7 is almost the same as the first paragraph of 4.7 of the old BS except that the permitted maximum time for unverified periods (gaps) has been extended slightly from 28 days to 31 days.

The third paragraph of 4.7 states:

Where it is not possible to establish by direct reference to current and former employers, the organization should follow the additional guidance in obtaining acceptable alternative evidence to verify the relevant period [see 4.7g)].

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The fourth paragraph of 4.7 (very similar to the first paragraph of 4.5 of the old BS) states that for security screening purposes, the organization should seek verification of the following, confirmation obtained in writing and copies retained:

- a) Date of leaving full-time education:

There are no significant changes here.

- b) Periods and type of employment:

There are no significant changes here except that questions to previous employers about reasons for leaving, whether anything is known about the individual that would reflect adversely on their suitability for proposed employment, and whether former employers would re-employ, has been turned into a Note in recognition of the fact that many employers, these days, are only willing to confirm dates of employment and titles of positions held. However we would encourage you, where possible, to still consider asking previous employers these questions because the answers, where given, can be very useful in relation to the background of the individual.

- c) Periods of registered unemployment:

There are no significant changes here. When obtaining references in writing, it is important to be sure that the source is genuine. If necessary, extra checks can be made to verify the validity of facsimile numbers, postal and email addresses.

- d) Periods of self-employment:

There are no significant changes here.

- e) Periods of residence abroad:

There are no significant changes here.

- f) Periods of extended travel abroad (longer than 31 days): for periods where an individual has been abroad (i.e. travelling and also possibly casual working), confirmation of dates should be sought by the screening officer to satisfy themselves that from the evidence submitted, it is reasonable to accept that the individual was abroad during the dates specified. Acceptable evidence could include: airline tickets, holiday booking paperwork, non EU visa and passport stamps, personal references, card payment/bank statement, currency exchange receipts, mobile phone bill, employment references whilst working abroad.**

This is a new requirement covering periods of extended travel abroad (as distinct from periods of residence abroad). Care should be taken regarding the authenticity of the documents provided and wherever possible you should ask to see originals.

- g) Career and history record incomplete: where the record of career and history is incomplete, the screening officer should seek alternative evidence to verify the duration and the reasons for the incomplete record. Examples of potential evidence should include NI records or two or more different items from: payslips (start and finish of a period), P60s, P45 (to show date of leaving), redundancy letter (confirming end of a period), contract of employment or offer letter (to show start of employment), bank statements**

(to show regular payment of wages/salary), proof of long service, company identification, any correspondence from the employer to the employee over the period.

This is a move away from requiring two references to verify “gaps” in career and history. Instead, the organisation must ask for alternative evidence of the kinds listed above, but must still obtain confirmation from one character reference (see immediately below).

The period should be independently confirmed by a character referee. A character reference should not be obtained from previous employers, relatives (by blood or by marriage) and/or persons residing at the same address as the individual. The character referee should be asked to confirm that they have personal knowledge of the individual being security screened during the gap period in question.

h) Statutory declaration:

There are no significant changes here.

The organization must keep an auditable record (Annex A, Form 7) of all cases where Executive(s) have used the Statutory Declaration (Annex A, Form 6).

- i) One written character reference: (this may be a written reference from the person contacted for an oral reference as part of limited security screening): **the character reference should cover a minimum period of two years immediately prior to the date of application and the character referee should be asked to confirm whether anything is known about the individual being security screened which would reflect adversely upon the individual's suitability for the employment concerned. A character reference should not be obtained from previous employers, relatives (by blood or by marriage) and/or persons residing at the same address as the individual.**

Aside from any additional character references needed to cover “gaps” (see 4.7 g)), only one written character reference is required, which may be a written reference from the person who was contacted for an oral reference as part of limited security screening (see 4.5.2).

- j) **Criminal record check: The organization should ensure that at least one of the following is either held by, or has been obtained for, the individual being security screened:**

- 1) SIA licence for the appropriate sector (if applicable); or**
- 2) ACPO Appendix C check (police letter) under the ACPO Security Systems Policy ⁵⁾; or**
- 3) Basic Disclosure from the appropriate government body ⁶⁾.**

⁵⁾ This applies in England, Wales and Northern Ireland only.

⁶⁾ At the time of writing the appropriate government bodies are Disclosure Scotland, Access Northern Ireland and where appropriate the Criminal Records Bureau.

There is no change in relation to obtaining criminal record checks apart from some additional Notes (see the new BS for details). However the wording of the Standard appears to be clearer.

The last paragraph of 4.7 states:

An organization should not make an offer of confirmed employment unless full security screening has been completed satisfactorily.

4.8 Review of the screening process

There are no significant changes here.

5 Ancillary staff

The recommendations given in this British Standard should be applied to all ancillary staff (see 2.1) engaged in relevant employment (see 2.8) **who have access to sensitive information, assets or equipment.**

The organization should have in place procedures which ensure that individuals who have not been security screened are restricted from having access to sensitive information, assets or equipment.

This clause of the Standard has been tightened up to the extent that procedures must ensure that individuals who have not been security screened are restricted from having access to sensitive information, assets or equipment.

We accept, as was stated in the Note in the old BS, that secretarial staff may be employed on a strictly short-term basis provided that their access to information of a confidential nature is limited and such access is restricted to situations where it is necessary, and they are supervised by permanent, fully security screened members of staff.

6 Acquisitions and transfers

There are no significant changes here apart from the inclusion of a reference, in a Note, to the Data Protection Act 1998 and the deletion of Note 1 in the old BS about retrospective security screening of transferred employees always being carried out with a degree of sensitivity. This is not to say that sensitivity no longer applies in relation to the security screening of transferred employees.

7 Subcontractors

NOTE 1 Attention is drawn to Private Security Industry Act, 2001 [12].

The recommendations given in this British Standard should be applied to all **subcontractors** who, through contractual arrangements, are engaged in relevant employment (**see 2.8**).

Before **an organization can allow** individuals from a subcontractor to be engaged in relevant employment, the organization should either:

- a) ensure that the subcontractor provides evidence that it operates in accordance with the recommendations given in this standard and in accordance with the terms and conditions of the organization's insurance policy; or

NOTE 2 Evidence can include:

- 1) current proof of certification by a UKAS accredited certification body which includes BS 7858 in the scope or an SIA approved contractor. In both cases a written statement that the individual(s) being supplied have been screened in accordance with BS 7858 is required; or
- 2) a fully completed BS 7858 screening file relevant to their current contract.

- b) carry out full security screening of all of the relevant contracted personnel.

The revised wording in a) above provides for two options, 1) and 2), in relation to providing evidence of security screening.

In relation to option 1), it is important to note that a written statement is required, for each and every one of the individuals being supplied as subcontractors, that they have in fact been security screened in accordance with BS 7858.

The revised wording of clause 7 places more emphasis on "subcontractors" and less emphasis on "contractors".

In general terms "subcontractors" may be regarded as individuals who are in relevant employment and are carrying out the same (or similar) duties in relation to the provision of security services that staff employed by the organization would otherwise do.

On the other hand, "contractors" may provide various other services to the organisation such as cleaning services, software support services, maintenance services, vending machine services and so on. If we assume that people visiting the organization's premises as "contractors" may not be security screened, then the organization must take measures to ensure that these unscreened people do not have access to sensitive information, assets or equipment (similar to the treatment of ancillary staff in clause 5 above).

Sometimes "contractors" may not need to visit the organization's premises to carry out their work. For example software support companies may be able to carry out some of their work remotely.

It is of course important, where applicable, for organizations to have commercial confidentiality agreements in place with "contractors" to safeguard their position in relation to Data Protection as well as the Security Issues relating to the possibility of third parties having access to sensitive information, assets or equipment.

8 Individuals employed in security screening

8.1 General

The screening controller(s) and screening officer(s) should be security screened in accordance with the recommendations of this British Standard. **An individual should not self-screen.**

The additional text about not self-screening is no different to what we would expect.

The screening controller(s) **and screening officer(s)** should sign a confidentiality ⁷⁾ agreement, **covering both the period of employment and post employment**, relating to the disclosure of the organization's confidential information and/or material with respect to **individuals** and employees past, present and future.

⁷⁾ **Sometimes known as a non-disclosure agreement.**

The change here relates to the agreement or disclosure needing to cover both the period of employment and post employment.

8.2 Training

There is an additional statement as follows:

Training records should be maintained.

This is no different to what we would expect.

8.3 Outsourced security screening

There are no changes.

9 Records held after cessation of employment

The change in title of this clause reflects the change to its content.

The content of 9.1 of the old BS (9.1 General) has been moved to 4.2 of the new BS (Administration).

The content of 9.2 of the old BS (9.2 Cessation of employment) has been held in clause 9 of the new BS without significant changes. However there appears to be an error in relation to item g) which states "employment verification and personal references (Form 5A or its equivalent)". We believe that the reference to "Form 5A" should instead be "Form 5B".

The content of 9.3 of the old BS (9.3 Security of the screening data) has been moved to 4.2 of the new BS (Administration).

The content of 9.4 of the old BS (9.4 Model forms) has been moved to Annex A of the new BS (Example forms).

Annex A Example forms

Annex A in the old BS (Information regarding the Rehabilitation of Offenders Act 1974) has been deleted from the new BS. Our understanding is that this relates to BSI policy not to include guidance about the law in BS Standards.

Annex A of the new BS contains the example forms which are:

Form 1 Oral enquiry – Previous employer

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There is no change apart from using the term “screening officer” in place of “Individual making enquiry”.

Form 2 Oral enquiry – Other than previous employer, e.g. character reference

There is no change apart from using the term “screening officer” in place of “Individual making enquiry”.

Form 3 Request for confirmation of information given orally

There is no change.

Form 4 Verification progress sheet

There is no change apart from including “sanctions list check” in the list of checks, which is not mandatory in all cases.

Form 5A Application form

This is a useful new form, which you can use “as is” or adapted to suit the style of your organisation.

Form 5B Authorization and compliance

This is an expanded version of Form 5 of the old BS and, as such it contains useful additional information reflecting the content of the new BS.

The reference (in Declarations) to a UV scanner or similar device, but not imply that the organization must have or use such scanning devices, only that the individual is giving permission for such scanning devices to be used (for example by third-party screening organisations).

Form 6 Statutory declaration

There is no change.

Form 7 Executive acceptance of risk

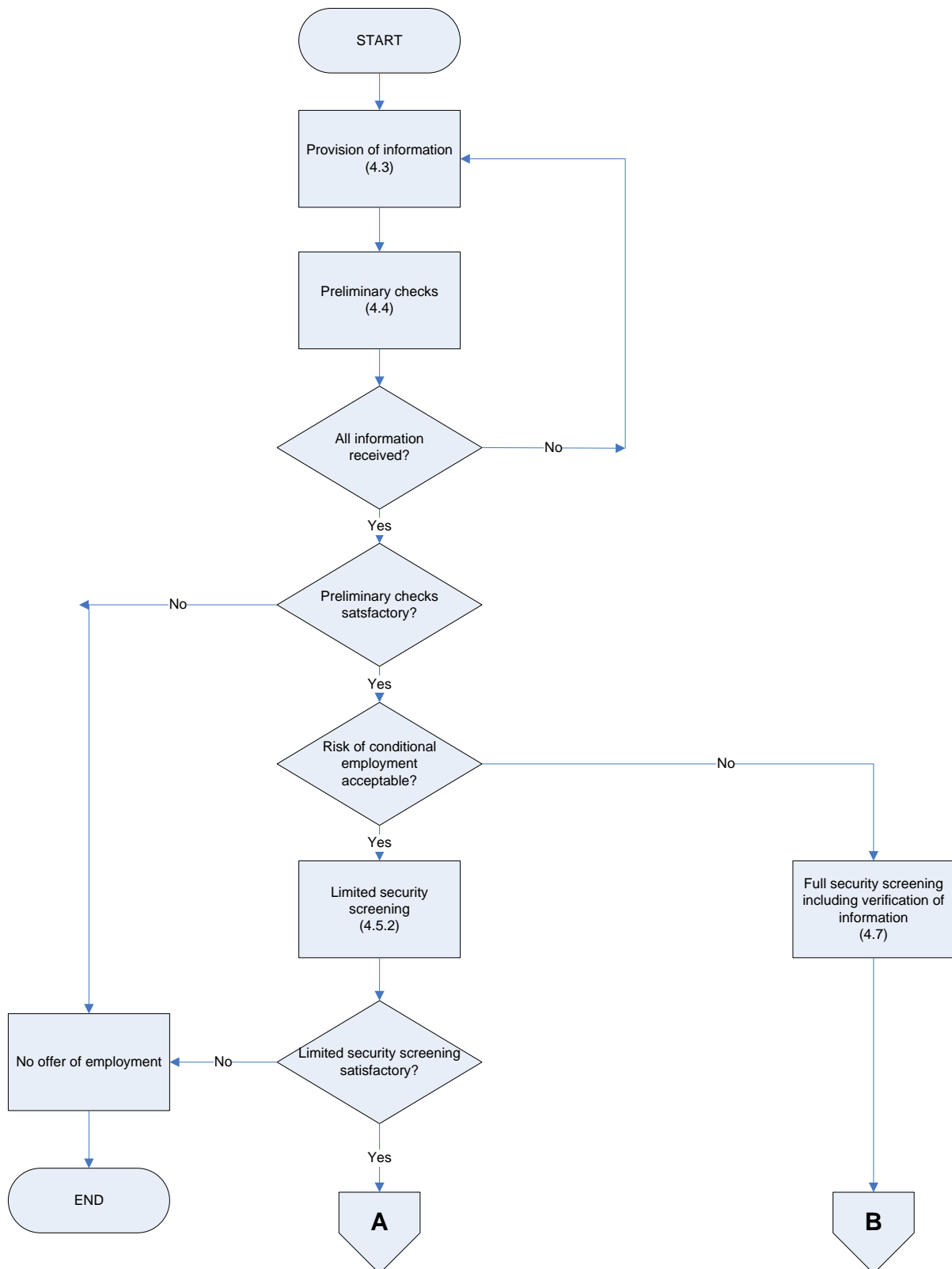
There is no change apart from using the term “conditional” in place of “provisional”.

Annex C in the old BS (Information on the Data Protection Act 1998) has been deleted from the new BS. Our understanding is that this again relates to BSI policy not to include guidance about the law in BS Standards.

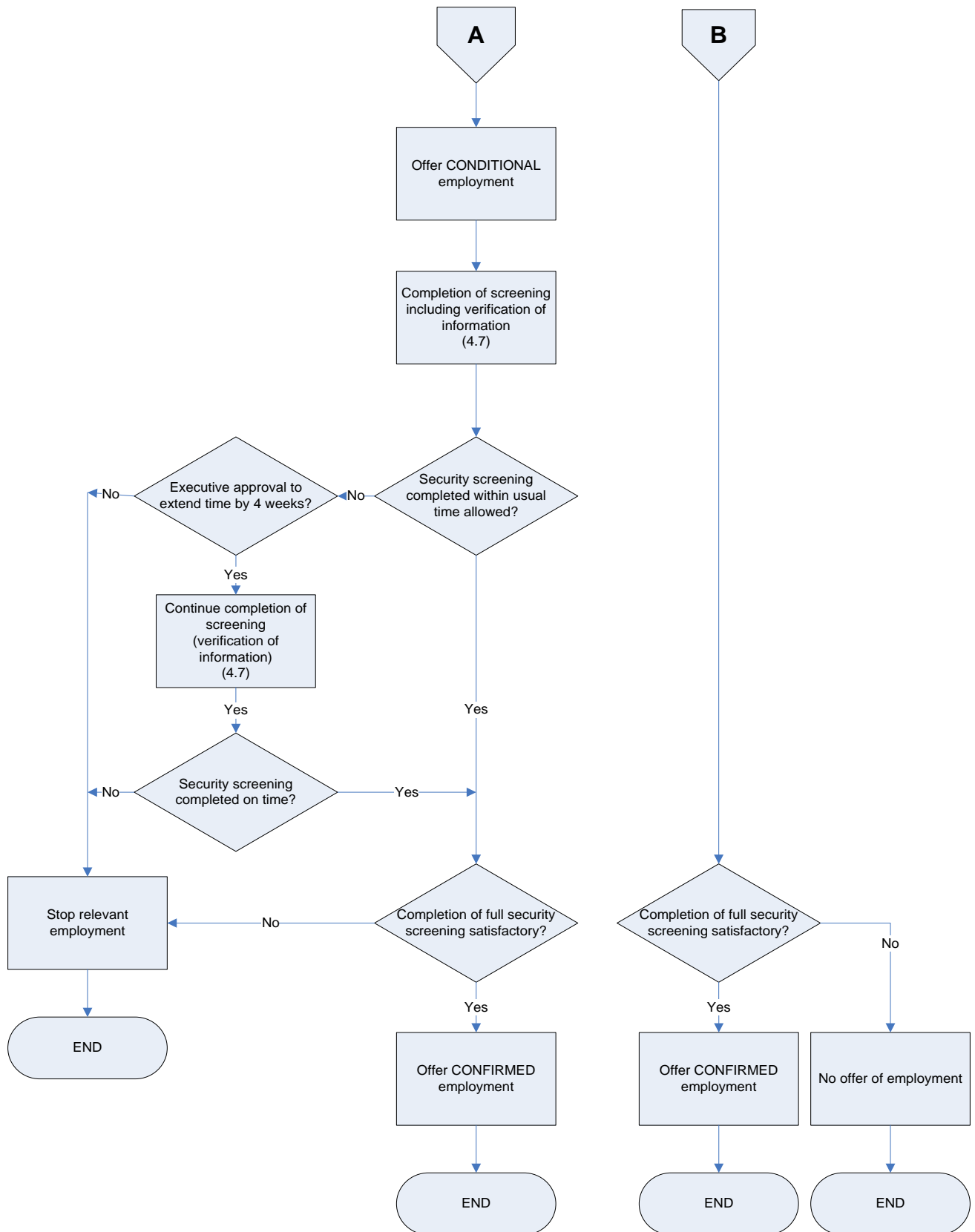
Bibliography

The bibliography has been updated. Please refer to the new BS for details.

Annex 1 - Flowchart of the security screening process



Annex 1 - Flowchart of the security screening process (continued)



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Annex 2 – Cross References for Clauses in the New and Old Standards (Cross references do not equate to equivalence between the new and old Standards)

BS 7858:2012		BS 7858:2006+A2:2009	
Security screening of individuals employed in a security environment – Code of practice		Security screening of individuals employed in a security environment – Code of practice	
Clause number and content	Para No	Clause number and content	Para No
Foreword		Foreword	
Supersedes BS 7858:2006+A2:09		Supersedes BS 7858:2006+A1:07	
1 Scope		1 Scope	
1 Scope	Para 1	1 Scope	Para 1
1 <i>Property</i>	<i>Note 1</i>	1 <i>Property</i>	<i>Note 1</i>
1 <i>Home Affairs Committee</i>	<i>Note 2</i>	1 <i>Home Affairs Committee</i>	<i>Note 2</i>
1 <i>Insurers policy conditions</i>	<i>Note 3</i>		
1 Application of the Standard	Para 2	3.8 Application of the Standard	
2 Terms and definitions		2 Terms and definitions	
2.1 ancillary staff		2.1 ancillary staff	
2.2 conditional employment		2.4 provisional employment	
2.3 confirmed employment		2.2 confirmed employment	
2.4 executive			
2.5 individual			
2.6 limited security screening			
2.7 organization		2.3 organization	
2.8 relevant employment		2.5 relevant employment	
2.9 screening controller		2.6 screening controller	
2.10 screening officer			
2.11 security screening form(s)			
2.12 security screening period		2.7 security screening period	
2.13 subcontractor			
2.14 wet signature			
2.15 writing		2.8 writing	
3 Risk management		3 General	
3 Unsuitable individuals	Para 1	3.1 Unsuitable individuals	
3 <i>Employment law & insurance</i>	<i>Note 1</i>		
3 Honesty and integrity	Para 2	3.3 Honesty and integrity	
3 Integrity of personnel	Para 3	3.4 Integrity of personnel	
3 <i>Risk management</i>	<i>Note 2</i>		
3 <i>Employment prevented</i>	<i>Note 3</i>	3.4 <i>Employment prevented</i>	<i>Note</i>
4 Security screening process		4 Security screening process	
4.1 Overview		4.1 General	
4.1 Security screening	Para 1	3.5 Security screening	
4.1 <i>Acquisitions & transfers</i>	<i>Note 1</i>		
4.1 <i>Labour is subcontracted</i>	<i>Note 2</i>		
4.1 In relevant employment	Para 2	3.7 In relevant employment	
4.1 <i>Data Protection Act (DPA)</i>	<i>Note 3</i>		
4.1 <i>Already screened</i>	<i>Note 4</i>	3.7 <i>Already screened</i>	
4.1 Full security screening	Para 3		
4.1 <i>Rehab. of Offenders Act</i>	<i>Note 5</i>	3.8 <i>Rehab. of Offenders Act</i>	<i>Note</i>
4.2 Administration		4.2 Screening file	
4.2 Data stored securely	Para 1	9.1 Data stored securely	Para 1

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BS 7858:2012		BS 7858:2006+A2:2009	
Clause number and content	Para No	Clause number and content	Para No
4.2 Data held confidentially	Para 1	4.1 Data held confidentially	Para 4
4.2 Preventing data alteration	Para 1	4.1 Preventing data alteration	Para 5
4.2 DPA and notifying ICO	Note 1	4.1 DPA and ICO	Note 3
4.2 BIP 0008-1 and so on	Note 2	9.1 BIP 0008-1 and so on	Note 2
4.2 Review/update practices	Para 2	9.3 Security of screening data	
4.2 ICO employment code	Note 3	4.1 ICO employment code	Note 3
4.2 Separate file per individual	Para 3	9.1 Separate file per individual	Para 2
4.2 Keeping track of dates	Para 4	9.1 Keeping track of dates	Para 3
4.2 Retain screening file	Para 5	9.1 Retain screening file	Para 4
4.3 Provision of information		4.3 Provision of information	
4.3.1 General			
4.3.1 Written evidence	Para 1	4.3 h) Evidence in writing	h)
4.3.1 Genuine source & validity	Note		
4.3.2 Authorizations			
4.3.2 Security screening form	Para 1		
4.3.2 a) – c) Written permission	Para 2		
4.3.2 a) Contact employ. withheld	Para 2	4.3 h) Contact employer withheld	h)
4.3.3 Information required			
4.3.3 a) Personal details	1)-6), 8)	4.1 General	Para 3
4.3.3 a) Evidence right to work	7)	3.2 Evidence of right to work	
4.3.3 b) Education, employment	Para 1	4.3 b) Education, employment	
4.3.3 b) Education, employment	Note 1	4.3 g) Education, employment	Note 2
4.3.3 b) Longer screening period	Para 2	3.6 Longer screening period	
4.3.3 c) Character referee		4.3 c) Character referees	
4.3.3 d) Cautions or convictions		4.3 d) Cautions or convictions	
4.3.3 e) Bankruptcy and so on		4.3 e) Bankruptcy and so on	
4.3.3 f) Acknowledgement		4.3 f) Acknowledgement	
4.3.3 g) Statement in writing	Para 1	4.3 g) Statement in writing	
4.3.3 g) Statement in writing	Note 2		
4.3.3 g) Wet signature	Note 3		
4.3.3 g) Example text, Form 5B	Note 4	4.3 g) Example text, Form 5	Note 1
4.3.3 h) Signed declaration		4.3 h) Obtaining evidence	
4.3.4 Interview			
4.3.4 Interview	Para 1	4.1 Personal interview	Para 2
4.3.4 Interview	Note		
4.4 Preliminary checks			
4.4 a) Screening file		4.2 Screening file	
4.4 b) All information in 4.3.3		4.7.1 c) All information in 4.3	
4.4 b) Paper or electronic format	Note 1		
4.4 b) Original wet signature	Note 2		
4.4 c) Confirmation of identity	Para 1	4.3 a) Proof of identity	
4.4 c) SIA requirements	Note 3		
4.4 c) Photographic ID	Para 2		
4.4 c) Verify SIA licence	1)	4.3 a) Current SIA licence	
4.4 c) SIA identity check	Note 4		
4.4 c) Retain search of register	1)		
4.4 c) Further verification	Note 5		
4.4 c) No SIA Licence	2)		
4.4 c) Additional verification	Note 6		
4.4 c) Retain documents on file	Para 3	4.3 a) Retain documents on file	

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BS 7858:2012		BS 7858:2006+A2:2009	
Clause number and content	Para No	Clause number and content	Para No
4.4 c) <i>SIA licensing details</i>	<i>Note 7</i>		
4.4 c) <i>Immigration etc. Act</i>	<i>Note 8</i>	3.2 <i>Immigration etc. Act</i>	
4.4 c) <i>Illegal working</i>	<i>Note 9</i>		
4.4 d) Confirmation of address	Para 1	4.3 a) Proof of address	
4.4 d) Retain documents on file	Para 2	4.3 a) Retain documents on file	
4.4 d) Check for authenticity	Para 3		
4.4 e) Public financial information	Para 1	4.5 g) Financial history	Para 1
4.4 e) Official public record	1) – 7)	4.5 g) Official public record	i) – vi)
4.4 e) <i>Not a credit check</i>	<i>Note 10</i>		
4.4 e) If not on electoral roll	Para 2		
4.4 e) Concern during search	Para 3	4.5 g) Concern during search	Para 2
4.4 e) Accepting the risk	Para 4	4.5 g) Accepting the risk	Para 3
4.4 e) <i>Agree with insurers</i>	<i>Note 11</i>	4.5 g) <i>Agree with insurers</i>	<i>Note</i>
4.4 e) <i>Financial sanctions targets</i>	<i>Note 12</i>		
4.5 Conditional employment		4.7 Conditions for commencement of provisional employment	
4.5.1 General			
4.5.1 Conditions	a) – c)		
4.5.2 Limit'd security screening			
4.5.2 a) Career and history		4.7.1 d) Career and history	
4.5.2 a) <i>Oral confirmation</i>	<i>Note 1</i>	4.7.1 d) <i>Oral confirmation</i>	<i>Note</i>
4.5.2 b) One character reference	Para 1	4.7.1 f) One character reference	
4.5.2 b) Contact by telephone	1) i) – iii)	4.7.1 f) Contact by telephone	i) – v)
4.5.2 b) Screening record	2) i) – ii)	4.7.1 g) Screening record	Para 1
4.5.2 b) Forms should be used	Para 2	4.7.1 g) <i>Forms recommended</i>	<i>Note 1</i>
4.5.2 b) Conditional employ offer	Para 3	4.7.1 g) Provisional employ offer	Para 2
4.5.2 b) Terms and conditions	Para 4		
4.6 Period allowed for completion of full security screening for individuals in conditional employment		4.8 Period allowed for completion of security screening	
4.6 a) 5 year period in 12 weeks	Para 1	4.8 5 year period in 12 weeks	Para 1
4.6 b) Longer period in 16 weeks	Para 1	4.8 Longer period in 16 weeks	Para 1
4.6 Extension by Executive	Para 2	4.8 No extension	Para 2
4.6 <i>Rescreen after 31 days</i>	<i>Note</i>		
4.7 Completion of screening (verification of information)		4.5 Verification of information	
4.7 Complete in period allowed	Para 1		
4.7 Education and employment	Para 2		
4.7 Alternative evidence	Para 3		
4.7 Verification	Para 4	4.5 Verification	Para 1
4.7 a) Date of leaving education		4.5 a) Date of leaving education	Para 1
4.7 b) Employment history		4.5 a) Employment history	Para 2
4.7 b) <i>Reason for leaving etc</i>	<i>Note 1</i>	4.5 a) <i>Reason for leaving etc</i>	Para 3
4.7 c) Registered unemployment		4.5 b) Registered unemployment	
4.7 d) Self-employment		4.5 c) Self-employment	
4.7 e) Residence abroad		4.5 d) Residence abroad	
4.7 f) Extended travel abroad			
4.7 g) Incomplete record “gaps”	Para 1	4.5 e) Incomplete record “gaps”	Para 1
4.7 g) Character referee	Para 2	4.5 e) Character referees	Para 2

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Clause number and content	Para No	Clause number and content	Para No
4.7 g) <i>Exceptional cases</i>	Note 2	4.5 e) Exceptional cases	Para 3
4.7 h) Statutory declaration	Para 1	4.5 f) Statutory declaration	Para 1
4.7 h) Prior approval	Para 2	4.5 f) Prior approval	Para 2
4.7 h) <i>Form 7</i>	Note 3	4.5 f) <i>Form 6</i>	Note
4.7 i) One written character ref.		4.6 References in writing	
4.7 j) Criminal convictions	Para 1	4.5 h) Criminal convictions	Para 1
4.7 j) <i>Basic disclosure</i>	Footnote	4.5 h) <i>Basic disclosure</i>	Note 3
4.7 j) <i>Appendix C check</i>	Note 4		
4.7 j) <i>CRB Code and Guide</i>	Note 5	4.5 h) <i>CRB Code and Guide</i>	Note 2
4.7 j) <i>Higher level disclosure</i>	Note 6	4.7.2 <i>Higher level disclosure</i>	Note
4.7 j) <i>Information themselves</i>	Note 6	4.5 h) Information themselves	Para 2
		4.5 h) Discrepancy	Para 3
4.7 j) <i>Effective screening</i>	Note 7	4.3 h) <i>Effective screening</i>	Note
4.7 j) Confirmed employ offer	Para 2	8.1 <i>Confirmed employ offer</i>	Note
4.8 Review of the screening process		4.9 Review of the screening process	
4.8 Systematic admin system	Para 1	4.9 Systematic admin system	Para 1
4.8 Verification progress sheet	Para 2	4.9 Verification progress sheet	Para 2
4.8 <i>Progress sheet Form 4</i>	Note	4.9 <i>Progress sheet Form 4</i>	Note
5 Ancillary staff		5 Ancillary staff	
5 Screen ancillary staff	Para 1	5 Screen ancillary staff	Para 1
5 Restricted access	Para 2	5 Restricted access	Para 1
		5 <i>Secretarial staff</i>	Note
6 Acquisitions and transfers		6 Acquisitions and transfers	
6 Screening reviewed	Para 1	6 Screening reviewed	Para 1
6 Screening individuals	Para 2	6 Screening individuals	Para 2
		6 <i>Sensitivity of screening</i>	Note 1
6 <i>Employment Rights Act</i>	Note	6 <i>Employment Rights Act</i>	Note 2
7 Subcontractors		7 Contractor and subcontractors	
7 <i>Private Security Industry Act</i>	Note 1		
7 Screen subcontractors	Para 1	7 Screen subcontractors	Para 1
7 a) Evidence of screening		7 a) Evidence of screening	
7 b) Carry out screening		7 b) Carry out screening	
8 Individuals employed in security screening		8 Individuals employed in security screening	
8.1 General		8.1 General	
8.1 Screen controllers/officers	Para 1	8.1 Screen controllers/officers	Para 1
8.1 Confidentiality agreement	Para 2	8.1 Confidentiality agreement	Para 2
8.1 Adequate supervision	Para 3	8.1 Adequate supervision	Para 3
8.1 Personal opinion versus fact	Para 4	3.3 Personal opinion versus fact	
8.2 Training		8.2 Training	
8.2 Screening people trained	Para 1	8.2 Screening individuals trained	
8.2 <i>External courses</i>	Note	8.2 <i>External courses</i>	Note
8.3 Outsourced security screening		8.3 Outsourced security screening	
8.3 Organization's responsibility		8.3 Organization's responsibility	
9 Records held after cessation of employment		9.2 Cessation of employment	
9 Records maintained for 7 years	Para 1	9.2 Records maintained for 7 yrs	Para 1

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Clause number and content	Para No	Clause number and content	Para No
9 a) Written information	Form 5A	9.2 a) Written information	
9 b) Signed statement		9.2 b) Signed statement	
9 c) Proof of identity		9.2 c) Proof of identity	
9 d) Character references		9.2 d) Character references	
9 e) Record of career/history		9.2 e) Record of career/history	
9 f) Verification progress sheet	Form 4	9.2 f) Verification progress sheet	Form 4
9 g) Personal reference and employment verification	Form 5B	9.2 g) Personal reference and employment verification	Form 5
9 h) Statutory declaration	Form 6	9.2 h) Statutory declaration	Form 6
9 i) Executive acceptance of risk	Form 7	9.2 i) Executive acceptance	Form 7
		Annex A Information regarding Rehabilitation of Offenders Act 1974	
Annex A Example forms		Annex B Example forms	
Oral enquiry previous employer	Form 1	Oral enquiry previous employer	Form 1
Oral enquiry character reference	Form 2	Oral enquiry character reference	Form 2
Confirmation of oral information	Form 3	Confirmation of oral information	Form 3
Verification progress sheet	Form 4	Verification progress sheet	Form 4
Application form	Form 5A		
Authorization and compliance	Form 5B	Personal reference and employment verification	Form 5
Statutory declaration	Form 6	Statutory declaration	Form 6
Executive acceptance of risk	Form 7	Executive acceptance of risk	Form 7
		Annex C Information on the Data Protection Act	
Bibliography		Bibliography	