

1. Policy Statement

Statom Group is an equal opportunities employer and is fully committed to ensuring that all job applicants and employees are treated fairly and consistently, regardless of any criminal convictions. Selection for employment is based solely on an applicant's skills, qualifications, experience, and suitability for the role.

Having a criminal record will not automatically prevent an individual from working for Statom Group. Decisions are made proportionately, considering the relevance of any convictions or cautions to the role applied for or held.

2. Scope

This policy applies to:

- All job applicants applying to Statom Group.
- All current employees where a DBS check or disclosure is required for their role.

3. Spent Convictions

- Statom Group does not discriminate against applicants with spent convictions or cautions.
- Unless the role is exempt under the Rehabilitation of Offenders Act 1974, applicants are not required to disclose spent convictions or cautions.
- Recruitment materials, including job adverts, application forms, and job descriptions, will clearly state that spent convictions do not need to be disclosed.

Rehabilitation Periods (per Rehabilitation of Offenders Act 1974):

Adults (18+ at conviction)

Disposal	Rehabilitation Period
Prison sentence over 48 months	Never spent
Registration on Sex Offenders Register	Never spent
Prison sentence 30–48 months	7 years from end of sentence (incl. licence)
Prison sentence 6–30 months	4 years from end of sentence (incl. licence)
Prison sentence ≤6 months	2 years from end of sentence (incl. licence)
Probation / Community Order	12 months from end of order
Fine	1 year from conviction date
Conditional Discharge	Until order expires
Compensation	Once paid in full

Minors (under 18 at conviction)

Disposal	Rehabilitation Period
Prison sentence over 48 months	Never spent
Registration on Sex Offenders Register	Never spent
Custodial sentence 30–48 months	3.5 years from end of sentence (incl. licence)
Custodial sentence 6–30 months	1.5 years from end of sentence (incl. licence)
Community / Youth Rehabilitation Order	6 months from end of order
Referral / Conditional Discharge	Until order expires
Fine	Not applicable
Compensation	Once paid in full
Absolute Discharge	No rehabilitation period

4. Unspent Convictions

- Applicants may be asked to disclose unspent convictions or cautions.
- Statom Group will not automatically refuse employment due to an unspent conviction; each case is assessed on its individual merits, taking into account:
 - The seriousness of the offence.
 - Relevance to the role.
 - Length of time since the offence.
 - Circumstances surrounding the offence.
- Failure to disclose unspent convictions when requested may result in:
 - Withdrawal of an offer of employment.
 - Disciplinary action, up to and including dismissal, if the employee has commenced work.

5. Exempt Roles

- Certain roles are exempt from the Rehabilitation of Offenders Act 1974 (e.g., work with children or vulnerable adults).
- Applicants for exempt roles must disclose all convictions and cautions, whether spent or unspent.
- Conditional offers for exempt roles may require disclosure via the DBS (or Disclosure Scotland).
- Statom Group will discuss any disclosed information with the applicant before deciding to withdraw a conditional offer.

6. Data Protection and Confidentiality

- All information on criminal convictions or cautions is handled in accordance with the Data Protection Act 2018, UK GDPR, and Statom Group's Data Protection Policy.
- Access to criminal records information is limited strictly to personnel involved in recruitment or employment decisions.
- Information will not be disclosed to unauthorised third parties or other employers without the individual's consent.
- Records will only be retained for as long as necessary for employment purposes and securely destroyed thereafter.

7. Review and Responsibility

- This policy is reviewed at least annually or sooner if legislation changes.
- Statom Group's Head of People (HR Director) is responsible for ensuring the policy is applied fairly and consistently.

8. Legal Compliance

This policy is compliant with:

- Rehabilitation of Offenders Act 1974 (as amended)
- DBS Code of Practice
- Equality Act 2010
- Data Protection Act 2018 / UK GDPR

SIGNED



Stan Nikudinski
CEO Statom Group Ltd.

Review: Annually
Date: 01/06/2025
Next Review: 01/06/2025

SIGNED



Martina Oyite
Group HR Director

Review: Annually
Date: 01/06/2025
Next Review: 01/06/2025