RECRUITMENT AND SELECTION POLICY

Company: Seaxes Travel Limited
Applies to: All employees, workers, contractors and recruitment activities undertaken on behalf of the Company
Effective Date: 1st December 2025
Policy Owner: Directors / Management
Review Date: December 2026, or earlier where legislation or operational requirements change

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1. Purpose

The purpose of this Recruitment and Selection Policy is to ensure that **Seaxes Travel Limited** recruits employees and workers in a fair, consistent, safe and legally compliant manner.

The Company is committed to:

- recruiting people based on their suitability for the role;
- treating applicants fairly and without unlawful discrimination;
- safeguarding passengers, children, vulnerable persons and colleagues;
- verifying qualifications, licences and experience;
- ensuring all employees have the legal right to work in the United Kingdom;
- carrying out appropriate pre-employment checks;
- protecting applicants' personal information;
- making reasonable adjustments for disabled applicants;
- maintaining appropriate recruitment records; and
- ensuring that recruitment decisions are based on objective and relevant criteria.

The Company recognises that recruitment is particularly important in passenger transport because employees may be responsible for the safety and wellbeing of passengers, including children and vulnerable persons.

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2. Scope

This policy applies to recruitment for:

- permanent employees;
- fixed-term employees;
- part-time employees;
- casual employees;
- workers;
- apprentices and trainees;
- agency workers where the Company is responsible for relevant checks;
- contractors where appropriate checks are required;
- PSV/PCV drivers;
- passenger assistants and escorts;
- engineering and garage staff;
- transport and operational staff;
- office and administrative staff; and
- management positions.

The Company will apply appropriate checks according to the particular role. Not every check will be required for every position.

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3. Legal and Regulatory Framework

Recruitment will be undertaken with regard to applicable UK legislation and guidance, including, where relevant:

- Equality Act 2010;
- Employment Rights Act 1996;
- Immigration, Asylum and Nationality Act 2006;
- Rehabilitation of Offenders Act 1974 and applicable exceptions;
- Data Protection Act 2018;
- UK GDPR;
- Health and Safety at Work etc. Act 1974;
- Worker Protection (Amendment of Equality Act 2010) Act 2023;
- Employment Rights Act 2025 and associated provisions coming into force;
- Disclosure and Barring Service legislation and guidance;

- applicable DVLA and Driver and Vehicle Standards Agency requirements;
- applicable Public Service Vehicle legislation and operator-licensing requirements; and
- relevant safeguarding requirements.

The Company will also have regard to current ACAS, GOV.UK, Home Office, DBS, ICO and other relevant official guidance.

Recruitment procedures will be amended where legislation or official guidance changes.

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4. Equal Opportunities

The Company is committed to providing equal opportunities to applicants.

Recruitment decisions will not unlawfully discriminate on the basis of:

- age;
- disability;
- sex;
- race, colour, nationality or ethnic or national origin;
- religion or belief;
- sexual orientation;
- gender reassignment;
- pregnancy or maternity;
- marriage or civil partnership; or
- any other characteristic protected by law.

The Company will not discriminate against an applicant because they are, or are not, a member of a trade union.

Recruitment decisions will be based on the requirements of the role and the candidate's ability to meet those requirements.

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5. Recruitment Authorisation

No vacancy should normally be advertised or filled without appropriate management authorisation.

Before recruitment begins, the relevant manager should establish:

1. the reason for recruitment;
2. the job title;
3. whether the position is permanent, temporary, fixed-term, part-time or casual;
4. the proposed hours;
5. the rate of pay or salary;
6. the essential qualifications;
7. the desirable qualifications;
8. the principal duties;
9. any legal or regulatory requirements;
10. required checks;
11. the proposed recruitment method; and
12. the person responsible for the recruitment process.

The Company should maintain an up-to-date job description and person specification for each position.

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6. Job Descriptions and Person Specifications

Job descriptions should accurately describe the duties and responsibilities of the position.

Person specifications should distinguish between:

Essential criteria

Requirements that a candidate must satisfy to undertake the role lawfully or safely.

Desirable criteria

Additional skills, qualifications or experience which may assist the candidate but are not essential.

Requirements must be relevant to the position.

The Company will avoid unnecessary requirements that could unlawfully disadvantage particular groups of applicants.

7. Advertising Vacancies

Vacancies may be advertised through appropriate channels, including:

- the Company's website;
- recruitment websites;
- social media;
- local advertising;
- industry-specific recruitment channels;
- employment agencies;
- professional networks;
- employee referrals; and
- other appropriate recruitment sources.

Job advertisements should normally include:

- job title;
- location;
- principal duties;
- hours or expected working pattern;
- pay or salary where appropriate;
- essential qualifications;
- relevant licence requirements;
- relevant employment checks;
- whether DBS or safeguarding checks are required;
- how to apply; and
- an equal opportunities statement.

Advertisements must not contain discriminatory wording.

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8. Applications

Applicants may be asked to provide:

- an application form;
- CV;
- employment history;

- qualifications;
- professional licences;
- relevant experience;
- references;
- contact details;
- relevant declarations; and
- other information reasonably required for the recruitment process.

Applicants should provide accurate and truthful information.

Where an applicant provides materially false information, the Company may withdraw an offer or, where employment has already commenced, take appropriate action under the Company's disciplinary procedures.

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9. Health and Disability Information

The Company will not routinely ask inappropriate health or disability questions during recruitment.

Questions relating to health or disability will only be asked where legally permitted and where necessary for legitimate purposes, such as:

- determining whether the applicant can perform an essential function of the role;
- determining whether reasonable adjustments are required for an interview or selection process;
- fulfilling a legal requirement;
- determining fitness for a safety-critical role where legally appropriate; or
- monitoring equality information where the information is kept separately from the recruitment decision.

The Company will consider reasonable adjustments for disabled applicants.

For safety-critical roles, including professional driving positions, any medical or fitness assessment will be based on the requirements of the role and applicable legal standards rather than assumptions about an applicant's age or disability.

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10. Shortlisting

Shortlisting should be based on the published job description and person specification.

Where reasonably practicable:

- candidates should be assessed against the same essential criteria;
- interview questions should be relevant to the role;
- selection decisions should be recorded;
- personal characteristics unrelated to the role should not influence the decision; and
- conflicts of interest should be declared.

Recruiters should not make assumptions about a candidate based on their name, age, sex, nationality, appearance, disability, family circumstances or other protected characteristic.

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11. Interviews

Interviews may be conducted:

- face-to-face;
- by telephone;
- by video;
- individually; or
- by a panel.

Interview questions should relate to the position.

Interviewers should avoid questions concerning protected characteristics unless the question is legally permitted and relevant.

Questions about marriage, children, pregnancy or future family plans should not be used to assess suitability.

Interviewers should not ask candidates questions which could amount to unlawful discrimination.

Where appropriate, candidates will be given the opportunity to request reasonable adjustments.

12. Selection Decisions

Selection decisions will be based on the candidate's suitability for the position.

Relevant factors may include:

- qualifications;
- relevant experience;
- competence;
- driving ability;
- customer service;
- communication;
- reliability;
- safety awareness;
- safeguarding awareness;
- technical knowledge;
- ability to meet the job requirements; and
- satisfactory completion of required checks.

The Company may use practical assessments, driving assessments, technical tests or other job-related assessments where appropriate.

Selection criteria will be applied consistently.

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13. PSV / PCV Driver Recruitment

Because driving roles are safety-critical, additional checks will apply.

Before a driver is permitted to undertake driving duties, the Company will verify, as applicable:

- identity;
- right to work;
- driving licence;
- appropriate entitlement for the vehicle to be driven;
- Driver CPC requirements;
- licence restrictions and endorsements;

- relevant vocational qualifications;
- required medical fitness;
- previous relevant employment;
- references;
- driving experience;
- tachograph requirements where applicable;
- disciplinary or safety information where legitimately available;
- DBS/safeguarding requirements where applicable; and
- any other checks required by legislation, the Company's Operator Licence or Company procedures from time to time.

The Company may undertake appropriate licence checks at recruitment and periodically thereafter.

No driver will be permitted to drive a vehicle for which they do not hold the required entitlement.

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14. Driver Medical Fitness

Where a medical examination or medical fitness declaration is required by law or because of the safety-critical nature of the position, the Company will ensure that the appropriate assessment is undertaken.

For professional drivers, the applicable DVLA medical standards will be followed.

The Company will not automatically reject an applicant because of age or a medical condition.

Where legally appropriate, the Company will consider whether reasonable adjustments can enable the individual to perform the role safely.

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15. Safeguarding and DBS Checks

Where a position involves regulated or otherwise eligible activity involving children or vulnerable adults, the Company will determine whether a DBS check is legally available and, if so, the appropriate level of check.

The Company will not request a Standard or Enhanced DBS check unless the role is legally eligible for that level of check.

For roles involving school transport or regular contact with children, the Company will assess the position against the applicable DBS and safeguarding requirements rather than automatically assuming that every transport role qualifies for the same level of check.

Where DBS checks are required, the Company will:

- explain the requirement to the applicant;
- obtain the appropriate application;
- assess the information lawfully and fairly;
- consider any relevant information in accordance with applicable legislation;
- maintain confidentiality; and
- retain information only for as long as reasonably necessary.

A DBS check will form part of the overall recruitment assessment and will not automatically determine suitability unless a legal restriction applies.

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16. Criminal Convictions

The Company will comply with the Rehabilitation of Offenders Act 1974 and applicable exceptions.

Applicants will not normally be required to disclose spent convictions where the law does not permit the Company to ask for that information.

Where the position is legally exempt from the normal spent-conviction protections, the Company may request the information required by law.

Any disclosed criminal record information will be treated confidentially and considered fairly and proportionately.

A criminal record will not automatically result in rejection unless the law requires this or the Company determines, after an appropriate assessment, that the information is relevant to the position.

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17. Right to Work in the UK

The Company must establish that every prospective employee or worker has the right to undertake the work before employment commences.

The Company will carry out the appropriate Home Office right-to-work check.

Depending on the individual's circumstances, this may involve:

- a manual document check;
- a Home Office online check; or
- an approved digital verification process where permitted.

The Company will retain evidence of the check in accordance with Home Office requirements.

Where a follow-up check is required, the Company will diarise the relevant date and complete the check within the required period.

No person will commence employment where the Company has not established the necessary right to work.

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18. References

Where references are requested, the Company may seek information regarding:

- dates of employment;
- job title;
- duties;
- relevant qualifications;
- driving experience;
- attendance or reliability where legitimately provided;
- disciplinary matters where appropriately disclosed; and
- other information relevant to the position.

References will be handled confidentially.

Where a candidate provides a referee, the Company may contact the referee for verification.

The Company may require references from previous employers, particularly for safety-critical, driving, safeguarding or management positions.

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19. Verification of Qualifications and Experience

The Company may verify qualifications and experience claimed by an applicant.

This may include:

- driving qualifications;
- Driver CPC;
- professional certificates;
- engineering qualifications;
- safeguarding qualifications;
- management qualifications;
- employment history; and
- other qualifications relevant to the position.

Where an applicant has materially misrepresented their qualifications or experience, the Company may withdraw the offer or take appropriate action following appointment.

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20. Agency Workers and Contractors

Where workers are recruited through an employment agency, the Company will establish which recruitment and pre-employment checks are the responsibility of the agency and which remain the responsibility of the Company.

The Company will obtain appropriate confirmation that required checks have been completed.

For safety-critical positions, the Company may carry out its own checks regardless of checks undertaken by an agency.

No agency worker or contractor will be permitted to undertake duties for which they are not appropriately qualified, authorised or checked.

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21. Offers of Employment

Offers of employment may be:

- conditional; or

- unconditional.

For safety-critical or regulated positions, offers will normally be conditional upon satisfactory completion of relevant checks.

Conditions may include:

- satisfactory references;
- right-to-work verification;
- driving licence verification;
- medical fitness;
- DBS check where applicable;
- qualification verification;
- satisfactory driving assessment;
- safeguarding checks;
- satisfactory employment history; and
- any other reasonable requirement relevant to the role.

The employment offer should clearly state any conditions that remain outstanding.

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22. Pre-Employment Checks

The Company will maintain a recruitment checklist appropriate to each position.

Typical checks may include:

Check	Driver	School Transport Role	Garage/Office
Identity	Yes	Yes	Yes
Right to work	Yes	Yes	Yes
Employment references	Normally	Normally	As appropriate
Driving licence	Yes	If driving	If driving
Driver CPC	If applicable	If driving	If driving
DVLA/driver entitlement	Yes	If driving	If driving

Check	Driver	School Transport Role	Garage/Office
Medical/ fitness	If required	If required	If required
DBS	Where eligible/required	Where eligible/required	Where applicable
Qualifications	Yes, where relevant	Where relevant	Where relevant
Safeguarding checks	Where applicable	Where applicable	Where applicable
Driving assessment	Where applicable	Where applicable	Where applicable

The exact checks will depend upon the duties of the position.

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23. Recruitment of Drivers Aged 70 or Over

The Company will not automatically exclude an applicant because they have reached a particular age.

Where an applicant is aged 70 or over and wishes to undertake professional driving duties, the Company will apply the same objective safety and legal requirements that apply to other professional drivers, including the applicable DVLA medical and licensing requirements.

Any additional checks required because of the driver's legal licensing position will be applied because of the legal requirement rather than age discrimination.

Where the Company considers a fixed-term or renewable contract appropriate for an individual, the decision must be based on legitimate business, operational, licensing or safety considerations and not simply on age.

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24. Safeguarding

The Company recognises its responsibility to safeguard passengers and employees.

Recruitment for positions involving children or vulnerable persons will incorporate appropriate safeguarding measures.

Recruiters should consider:

- previous relevant employment;
- references;
- DBS eligibility;
- safeguarding experience;
- professional conduct;
- appropriate boundaries;
- ability to follow safeguarding procedures; and
- any concerns arising from relevant pre-employment information.

Employees involved in school transport will be required to comply with the Company's safeguarding procedures.

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25. Sexual Harassment and Recruitment

The Company is committed to preventing sexual harassment during recruitment and employment.

Recruitment processes must be professional and free from unwanted sexual conduct, inappropriate comments, sexualised questions or other inappropriate behaviour.

Recruiters, managers and candidates must be treated respectfully.

The Company will take appropriate preventative measures and will investigate concerns raised about inappropriate behaviour during recruitment.

The Company will maintain appropriate measures to prevent sexual harassment in accordance with the applicable legal requirements.

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26. Data Protection and Confidentiality

The Company will process applicants' personal information in accordance with UK data protection law.

Information collected during recruitment may include:

- contact details;
- employment history;

- qualifications;
- references;
- right-to-work information;
- driving information;
- medical information where lawfully required;
- DBS information where applicable; and
- other information reasonably required for recruitment.

The Company will:

- collect only information that is relevant and necessary;
- explain how applicants' information will be used;
- restrict access to recruitment information;
- keep information secure;
- avoid retaining information unnecessarily;
- securely dispose of information when it is no longer required; and
- comply with applicable data protection rights.

Medical and criminal-record information will receive appropriate additional protection.

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27. Artificial Intelligence and Recruitment Technology

Where the Company uses artificial intelligence, automated screening or recruitment software, it must be used responsibly.

The Company remains responsible for ensuring that recruitment decisions comply with equality and data protection law.

AI or automated tools must not be relied upon blindly to make recruitment decisions.

Where automated processing could materially affect a candidate, the Company will consider:

- whether the processing is lawful;
- whether candidates have been appropriately informed;
- whether discriminatory bias may arise;
- whether human oversight is required; and

- whether the system produces reliable results.

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28. Recruitment Records

The Company will retain appropriate records of recruitment decisions.

Records may include:

- application;
- CV;
- interview notes;
- selection criteria;
- assessment results;
- references;
- right-to-work evidence;
- DBS information where applicable;
- licence checks;
- qualification checks;
- offer letter;
- recruitment correspondence; and
- reasons for selection or rejection where appropriate.

Recruitment records will be retained only for an appropriate period in accordance with the Company's data-retention procedures.

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29. Recruitment Complaints

Any applicant who believes they have been treated unfairly or unlawfully during recruitment may raise their concern with the Company.

Complaints will be considered fairly and confidentially.

Where a complaint concerns discrimination, harassment or another serious matter, the Company will investigate it appropriately.

No applicant will be disadvantaged for raising a genuine concern about unlawful discrimination or inappropriate recruitment practices.

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30. Responsibilities

Directors

Directors are responsible for ensuring that:

- the policy is implemented;
- recruitment complies with applicable legislation;
- appropriate resources are available; and
- recruitment practices are periodically reviewed.

Managers

Managers involved in recruitment are responsible for:

- following this policy;
- using objective selection criteria;
- maintaining confidentiality;
- completing appropriate checks;
- ensuring applicants are treated fairly; and
- raising concerns with management.

Recruitment / Administration Staff

Those responsible for recruitment must:

- maintain recruitment records;
- complete right-to-work checks;
- arrange references;
- verify qualifications and licences where required;
- arrange DBS checks where applicable;
- maintain confidentiality; and
- ensure that required checks are completed before the employee commences relevant duties.

Interviewers

Interviewers must:

- prepare relevant questions;
- avoid discriminatory questions;
- record relevant assessment information;

- treat candidates respectfully; and
- make decisions based on the requirements of the role.

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31. Recruitment Checklist

Before a new employee starts, the responsible manager should confirm:

Vacancy

☐ Position authorised
☐ Job description prepared
☐ Person specification prepared
☐ Pay and hours approved
☐ Advertisement checked for discriminatory wording

Application and Selection

☐ Application/CV received
☐ Essential criteria checked
☐ Interview completed
☐ Interview notes retained
☐ Selection decision recorded

Pre-Employment Checks

☐ Identity verified
☐ Right to work checked
☐ References obtained where required
☐ Qualifications verified where required
☐ Driving licence checked where applicable
☐ Driver CPC checked where applicable
☐ DVLA/entitlement check completed where applicable
☐ Medical requirements satisfied where applicable
☐ DBS check completed where legally applicable
☐ Safeguarding checks completed where applicable
☐ Driving assessment completed where required

Appointment

☐ Conditional offer issued where appropriate
☐ Outstanding conditions identified

☐ Employment contract prepared
☐ Start date confirmed
☐ Induction arranged
☐ Relevant Company policies provided
☐ Recruitment file completed

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32. Induction

All new employees will receive an appropriate induction.

Depending upon the role, this may include:

- Company policies;
- health and safety;
- safeguarding;
- equality and diversity;
- harassment and sexual harassment;
- customer service;
- confidentiality;
- data protection;
- emergency procedures;
- accident and incident reporting;
- vehicle and workplace safety;
- driver procedures;
- working time and drivers' hours;
- alcohol and drug policy;
- mobile phone policy;
- disciplinary procedures;
- complaints procedures; and
- role-specific training.

Drivers will receive appropriate operational and vehicle-specific induction before undertaking duties independently.

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33. Probation

Where a probationary period applies, the employee will be informed of:

- the length of the probationary period;
- the standards expected;
- any relevant performance measures;
- who will supervise the probation;
- how performance will be reviewed; and
- the consequences of failing to meet the required standards.

Probation does not remove the Company's obligation to comply with equality, discrimination, health and safety or other applicable employment legislation.

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34. Review of Policy

This policy will be reviewed at least annually and sooner where:

- legislation changes;
- Government guidance changes;
- DBS requirements change;
- DVLA or PSV requirements change;
- the Company's operations change; or
- an incident or recruitment concern identifies the need for amendment.

The next scheduled review is **December 2026**.