

External Supplier Control Obligations:

Pre-Engagement Vetting

NBS Public



Building Society

Pre-Engagement Vetting – required where a worker has unchaperoned access to NBS premises, data or systems

Control Title	Frequency	Scope	Control Description	Why this is Important to Nationwide
Identity Check	Before assignment starts	All roles	Verify the identity of an individual by checking valid, original photographic evidence and retain a copy as evidence.	To prove that the individual is who they say they are.
Address verification	Before assignment starts	All roles	Current address and address history is cross-referenced with databases including the electoral roll.	A check to confirm where the individual lives.
Criminal Record Check	Before assignment starts	All roles	A check to reveal any details of criminal convictions considered unspent, under The Rehabilitation of Offenders Act 1974. A check of the individuals name against the relevant UK jurisdictional agency – the organisation that holds details of legal decisions and judgements. Where applicable, an overseas criminal background check to see whether the individuals name exists on any criminality databases in other countries.	Checks that the individual is of good character, and helps guard against inappropriate disclosure of information by individuals with criminal or malicious intent.
5-year credit check	Before assignment starts	All roles	Carry out via law enforcement or other legal agencies, a credit and bankruptcy check of the individual, and retain a copy of the credit report on file.	These checks may reveal any individual who may pose a conflict of interest risk if the candidate is under financial pressure outside of the work environment.
Right to Work	Before assignment starts	All roles	Check that the individual is legally entitled to work in the UK by obtaining the original appropriate government-issued documentation and retain a copy as evidence.	To verify that the individual is legally entitled to work in the relevant jurisdiction(s).

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2-year academic qualifications/ (where required for the role)	Before assignment starts	All roles	A check to verify that any academic/professional qualifications declared are valid and held to the level stated.	To check that the individual has the suitable qualifications for their role.
2-year occupational history and written references (CV Check)	Before assignment starts	All roles	Employment and education history for the last two years.	To check the suitability and integrity of the person; that career gaps greater than three months are investigated and assessed to ensure that all information on previous employment is accurate; and that previous employers are genuine.
Sanctions check	Before assignment starts	All roles	Prove compliance with applicable sanctions laws by checking an individual is not listed on any official sanctions lists or restricted activity matrices.	If an individual is on a government and other sanctions list, this may pose regulatory or reputational risk for Nationwide.
CIFAS	Before assignment starts	Where the supplier is providing workers to Nationwide, (providing goods or services which do not involve the provision of workers to Nationwide is out of scope)	A search will be conducted in the Credit Industry Fraud Avoidance System (CIFAS), a search should be conducted against both the Internal Fraud Database and the National Fraud Database.	Checks that the individual is of good character, and helps guard against inappropriate disclosure of information by individuals with fraudulent history.

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Politically Exposed Person check	Before assignment starts	All roles	Perform a check to identify whether the individual: - Has Politically Exposed Person (PEP) status - Is an immediate family member of a PEP - Is a close associate of a PEP (e.g. in a close business relationship with a PEP). In the event the individual meets any of the above criteria, inform Nationwide and agree a solution as appropriate.	From an anti-bribery and corruption perspective, this screening guards against the risk of PEP status being used to exert improper influence for or on behalf of Nationwide.
Media Search	Before assignment starts	All roles	A search to be conducted using full name against open source internet data sources for any adverse media coverage. Date of birth and address will be used to narrow down the search to ensure validity.	Checks for individuals who may pose reputational risk.
Incomplete Checks or Adverse Results	Before assignment starts	All roles	Supplier must follow the contractual process for dealing with incomplete checks or adverse screening results. This may involve further discussion with the individual, completion of a declaration of fact, or a risk assessment to determine if engagement can still take place.	Verifies that Supplier personnel are not automatically assigned to Nationwide if the required evidence for a check cannot be gathered for an individual, or if they fail a check.
Regulated Screening	Before assignment starts	For roles requiring regulatory approval/certification	Full screening to be confirmed and completed by Nationwide at the time of on-boarding	Checks that an individual has the required approval from the regulator and that they are deemed 'fit and proper' to prevent regulatory risk.