

Gentle Route Ltd – Policy on Employing Ex-Offenders

(Issue 1.0 – 07 July 2025 | Compliant with TfL Statutory Standards, Rehabilitation of Offenders Act 1974 and DBS Code of Practice)

Operator: Gentle Route Ltd | Company No. 16380916

Registered office: Unimix House, Abbey Road, London NW10 7TR

ICO registration: ZA999999

Contact (HR Compliance): hr@gentleroute.co.uk

1 Purpose

We must balance public safety—especially for children and vulnerable adults—with fair recruitment. This policy explains how we recruit, assess and manage anyone with criminal convictions who wishes to work with or for Gentle Route Ltd as required by:

- Rehabilitation of Offenders Act 1974 (ROA)
 - Disclosure & Barring Service (DBS) Code of Practice
 - Department for Transport Statutory Taxi & PHV Standards (2022)
 - Transport for London PHV Operator Licence Conditions
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2 Scope

Applies to every “**associated person**” under TfL rules:

- Directors, company secretary, nominated representative
 - PHV drivers contracted by Gentle Route Ltd
 - Booking, dispatch and call-centre staff with access to passenger data
 - On-call managers and safeguarding leads
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3 Principles

1. **No unlawful discrimination** – we will not automatically bar applicants because of criminal history.
 2. **Risk-based decisions** – each case is judged on relevance, seriousness and time elapsed.
 3. **Data protection** – conviction information is processed under UK GDPR Art 6(1)(f) & DPA 2018 Sch 1 Pt 3 Para 10, stored encrypted and deleted when no longer needed (max 12 months after engagement ends).
 4. **Transparency** – we give applicants a copy of this policy at first enquiry.
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4 Disclosure requirements

- **Basic DBS certificate** dated within the last **12 months** is mandatory for all roles in §2.
 - Anyone who has lived outside the UK for **3 months or more in the past 10 years** must provide an official overseas **Certificate of Good Conduct** (plus English translation).
 - Certificates or reference numbers must be supplied **before** duties commence and updated annually thereafter.
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5 Assessment procedure

When a disclosure reveals convictions or cautions we complete Form HR-EXO-01, considering:

Factor	What we look at
Nature of offence	Violence, sexual, safeguarding or dishonesty offences weigh heavily.
Role relevance	Motoring offences matter most for drivers; fraud for finance roles.
Age at conviction	Youth offences may carry less weight.
Time elapsed	The older the conviction, the lower the risk.
Pattern	Single incident vs. repeated behaviour.
Mitigation	Rehabilitation, references, training completed.

The Compliance Manager signs-off; only the decision summary (Approved / Approved with conditions / Refused) is kept in the personnel file.

6 Possible outcomes

- **Approved** – engagement proceeds.
 - **Approved with conditions** – e.g. additional supervision, limited duties.
 - **Refused** – written explanation provided; applicant may appeal within 14 days.
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7 Appeals process

Appeals are reviewed by a director not involved in the original decision. Applicants may submit written evidence. Decision is delivered within 14 days and is final.

8 Ongoing disclosure duty

All associated persons must tell the Compliance Manager **within 48 hours** of any arrest, charge, caution or conviction incurred while engaged by us. We will notify TfL within the same timeframe per licence conditions.

9 Training

Recruiters, managers and safeguarding leads receive annual training on ROA rules, DBS filtering, unconscious bias and TfL/DfT standards.

10 Data storage & retention

Disclosure data is encrypted on a restricted HR drive; access limited to the Compliance Manager and Managing Director. Records are deleted/pseudonymised **12 months after the individual leaves**, unless an ongoing legal matter requires retention.

11 Monitoring & review

Compliance Manager reports anonymised statistics on disclosure decisions to the Board annually. This policy is reviewed every 12 months or sooner if legislation or TfL guidance changes.

Document owner: Compliance Manager

Approved by: Managing Director

Next review due: 07 July 2026