

Safer Recruitment Policy

HR19

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Author(s)	
Version	
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Reviewed by	

Date: []

Review Data

Initial Production

Name	Role/Department	RACI	Date

R = Responsible for writing the policy; **A** = Accountable; **C** = Consulted; **I** = Informed

Change History

Version	Date	Details of Change	Author

Emergency Contact Details

Name	Email	Mobile

CQC Fundamental Standards

Regulation Number	Regulation Details
Regulation 19: Fit and proper persons employed	Persons employed for the purposes of carrying on a regulated activity must be of good character and have the qualifications, competence, skills and experience which are necessary for the work to be performed by them.

Key Lines of Enquiry

KLOE	How this applies to Safer Recruitment
Safe	Safer recruitment ensures that we only employ staff who share the same values and ethos as the organization, helping maintain the safety of the service we provide.
Well led	By keeping comprehensive records evidencing the safer recruitment checks which have been conducted and continuing to update DBS checks we demonstrate that the organization is well led.

Related Documents

This policy should be read in conjunction with our:

- DBS Procedure
- Equality and Diversity Policy
- Safeguarding Vulnerable Adults Policy

Policy Statement



Policy Aim

This policy will explain how recruitment operates at Careville Ltd.

It will help you to understand how we go about selecting staff in ways that uphold the quality of the services we deliver. It will also describe the processes undertaken to maintain high standards and safety through recruitment.

Reading this policy should enable you to:

- Understand how Safer recruitment work at Careville Ltd
- Understand your role recruitment and what you can expect from these processes
- Understand how we can all work together to improve the quality of the services we offer through appropriate and safe safer recruitment processes

Careville Ltd aims to be the provider of choice within our catchment area and believes we will accomplish this aim by meeting the expectations of our clients, the families of clients, and all other associated stakeholders. At the heart of meeting these expectations is establishing a competent, skilled and dedicated workforce.

Staff are the lifeblood of our organization and attracting the right employees is important for maintaining high standards of service delivery, performance, and customer satisfaction. We will review and evaluate staffing thresholds and approaches to safer recruitment, where necessary, on a continuous basis.

This policy has been written in compliance with

- The Care Act 2014
- The London Multi-Agency Adult Safeguarding Policy and Procedures
- Equality Act 2010
- The Rehabilitation of Offenders Act 1974 (Exceptions)(Amendment) Order 1986
- The Police Act 1997

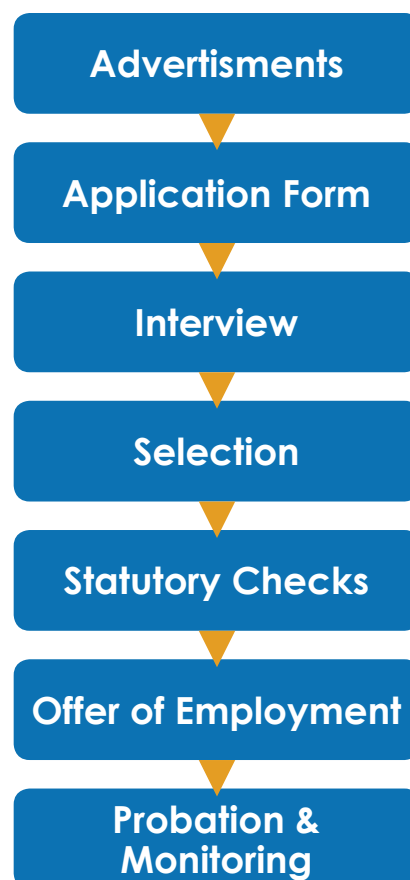
Why Effective Recruitment Matters

It is essential that Careville Ltd recruits and selects individuals with the necessary skills, expertise and qualifications for the organisation to function successfully. It is imperative that we employ members of staff who can:

- Deliver our Company's strategic objectives
- Promote our ethos and values
- Demonstrate requisite personal qualities
- Understand our approach and commitment to high quality care
- Make positive contributions to the aims of the organisation

The Recruitment Process

At Careville Ltd we follow a seven-step safer recruitment process, as detailed below. All prospective candidates will undertake the same process, ensuring a fair and equitable experience for every applicant.



Step 1 – Advertisements

Vacancies will generally be advertised in an appropriate newspaper or journal. Vacancies can also be advertised by word of mouth via existing personnel.

Advertisements will also be notified to the appropriate local Job Centre.

Local Recruitment: Where we hold contracts with and deliver services on behalf of Local Authorities, we will endeavor to recruit the required workforce from within the Local Authority's boundaries.

All vacancies will also be posted on the Company electronic and internal notice boards. Careville Ltd encourages and encourages internal promotions wherever possible as development opportunities for its staff. Vacancies can also be advertised by word of mouth via existing personnel.

Careville Ltd may, on occasions, decide to restrict advertisement to internal candidates only. Furthermore, junior posts will always be advertised internally in the first instance, to provide continuous development of existing members of staff, unless Management agrees that this is not appropriate due to the specialist skills required for the post involved.

Vacancies that are restricted to internal candidates only will be clearly indicated on the advertisement. All internal candidates will be selected for interview on the same criteria as external candidates.

Employees on maternity leave will receive all advertisements for posts advertised in the Company during their period of maternity leave.

In all recruitment activity, we comply fully with the Equality Act 2010 and our own Equality and Diversity Policy. This will apply in posting Job Adverts, compiling Job Descriptions and Person Specifications and throughout the safer recruitment process.

Job Posting

Additional to internal posting of any vacancies, Jobs can be advertised in Local media, Job Centres and in Online Media including Social Media, at recruitment fairs and via Recruitment agencies. This is to ensure that as a company, we can reach a wider pool of prospective employees as much as possible for any required Role. The advert must be aimed to attract the 'best fit' candidate and should be based on a clear specific the job description and detailed person specification.

A good advert should project a positive but realistic image and reflect Careville Ltd's commitment to Safeguarding Adults and Children, for example; 'Careville Ltd is committed to safeguarding and promoting the welfare of adults, children, young people. All staff are expected to implement the Safeguarding policies and procedures, act promptly on any concerns, communicate effectively and share information appropriately.

All adverts must stress that candidates successful at interview will be subjected to Disclosure and Barring Service, identity and reference checks.

Job Description

The job description will include the main requirements of the individual in the specific post, definition of interfacing roles and responsibilities, as well as the required relationship with people who use the services and other stakeholders.

Person Specification

The person specification should clearly define the qualifications, skills, experience and general attitudes needed by the candidate to successfully undertake the post. The requirements listed in the person specification must be objective, justified and measurable. It is best practice to focus on essential criteria rather than desirable criterion as it can lead to less objective decision making.

Desirable requirements may be used to distinguish between candidates who meet the essential requirements equally well. Skills, knowledge and experience relate to the practical ability of the candidate to perform the main tasks highlighted in the job description and are equally important in the selection of the ideal candidate.

Step 2 - Application Form

The application form will ask for the applicant's date of birth and any previous names used as well as details of relevant academic and vocational qualifications.

It will ask for full employment history, paid and unpaid including explanation of any gaps in employment at any point in their employment history.

It will ask candidates to explain how their experience to date will enable them to undertake the requirements of the post they have applied for.

It will ask for relevant qualifications and completed training specific to the role including but not limited to the Care Certificate, NVQ, QCF and any other Health and Social Care qualifications.

Under the Rehabilitation of Offenders applicants will be asked to disclose any convictions, cautions or bind-over's whether they are spent or not.

Where applicable, details must be provided in a sealed envelope.

The application form must be checked to ensure that they are fully completed. It should be checked for errors and discrepancies and incomplete application forms should be returned to applicants for proper completion.

In applying for posts, all candidates will be provided with a job description, details of the appropriate conditions of service and details about the Company. A brief statement about the appointment procedure will also be provided and, if possible, an indication of the date (or week) when interviews will be held. The job description will include:

- A list of the main duties and responsibilities of the post
- An outline of the requisite qualifications
- Details of any experience which candidates are expected to possess

Protected Characteristics and Equality & Diversity: In drawing up the job description and conditions of service the Company will ensure that no job applicant receives less favorable treatment than another on the grounds of disability, gender, race, religion or belief, age, pregnancy, sexual orientation, marital status, parental status, caring responsibilities or hours of work, and that no applicant is placed at a disadvantage unjustifiably by requirements or conditions which have a disproportionately adverse effect on a particular group.



Key Question: Do I have to declare if I have a physical or mental disability?

Applicants will be asked to specify whether they have any disabilities, as defined in the Equality Act 2010, i.e.:

“If they have a physical or mental impairment which has a substantial and long term effect on their ability to carry out normal day-to-day activities. Day-to-day activities include things such as using a telephone, reading a book or using public transport.”

Applicants are also encouraged to make us aware of any reasonable adjustments needed for them to attend an interview. All applicants with a disability who meet the essential criteria for a job will be interviewed, and considered on their merits.

References: In compliance to the forgoing provisions of this policy in addition to the requirements contained in Schedule 3 of the Health and Social Care Act 2008 (Regulation 2014); All care worker posts are subject to receipt of two satisfactory professional and character references from two employers. One must be the applicant's current or most recent employer. References must cover the candidate's lifetime employment history with explanation for any gaps.

Documentary evidence of relevant qualifications, full employment History and satisfactory information about their ability to work within a Regulated Activity is also strictly required.

All successful candidates must prove their “Right to Work” status through checks from the Home Office Department.

Formal employment offers must not be issued prior to the receipt of satisfactory written references and the provision of the following Original Documentation:

- A DBS enhanced Level Clearance
- An immigration Documentation proving a “Right to Work”
- Verification of Reasons for Leaving Previous Employment
- A written explanation of any spent or unspent convictions
- Verified Identity Documents.

Please note that all information supplied by the referees must remain confidential within the boundaries of the law.

Recording and Collection of Data: Applicants' details will be recorded at the point of receipt. All information relating to the data collected in the equality and diversity recruitment monitoring form will be hidden from all those involved in the Safer Recruitment process. The information collected will be solely used for the purposes of equality monitoring.

****All completed applications forms are private and confidential and should only be made available to those directly involved in the Safer Recruitment process.**

Shortlisting (Pre-Interview): All application forms will be collated by Human Resources Department/Company Administrator and supplied to the appointing manager and interview panel for shortlisting purposes.

A shortlist of candidates will be drawn up for interview, based entirely on merit and suitability for the post but taking account of the Company's responsibilities in relation to the Equality Act 2010. Other than in exceptional circumstances, reasonable notice will be given to ensure that candidates have sufficient time in order to prepare for, and make the necessary arrangements to attend the interview.

Step 3 & 4 – Interview and Selection

The short listing is based upon the key identified criteria from the person specification supplied. Short listing must be undertaken by a minimum of two representatives of the proposed interview panel, to ensure consistency and collective agreement.

Careville Ltd uses value based recruitment techniques in the interview process. Values-based interviewing is a structured means of exploring examples of applicants' work behaviors, rooted in organizational values and behaviors. It focuses on how and why the applicant has made certain choices in their work, and explores the attitudes and reasons underpinning their behavior. By incorporating this information alongside an applicant's experience, skills and competencies, Careville Ltd can gain a wider and more comprehensive view of the applicant, to recruit high performing, effective care workers that are more closely aligned with organizational values, such as their commitment to safeguarding and promoting the welfare of adults and children.

Notifying Applicants of Outcomes: All interviewed candidates will be notified of the outcome of the selection process as soon as possible, either by telephone or letter.

Step 5 & 6 - Relevant Checks and Offer of Employment

All offers of employment will be made conditional to satisfactory results from the following statutory checks, these checks are in place to ensure safer recruitment, in order to fully protect the company and our service users.

Right-to-work in the UK

All candidates must provide proof of their right to live and work in the UK.

Candidates with a UK passport, a European Economic Area (EEA) country passport or a Swiss passport have the right-to-work in the UK.

All other applicants should have additional documentation to prove their right-to-work in the UK. There are many documents/document combinations which prove the right to work. All documents must be sent to the UK Border Agency for checking and verification on what can be deemed acceptable proof. All non-UK/EEA citizens must have the approval of a manager prior to seeking work for them.

All original documents must be viewed by our Recruiting Managers and a signed copy taken.

Registration and qualifications

Checks should be made to ensure that each professional holds the correct qualifications relevant to their profession and to the assignment they will be placed in. Original copies of all

certificates should be obtained and all reasonable efforts made to verify these certificates by telephone or email to the training/awarding body.

It must be noted that proof of qualifications does not prove that the professional is registered with the relevant professional body.

Registration documents should be provided by the candidate, however in all cases online registration checks with the relevant professional body must be carried out to ensure that registration is current and that there are no restrictions to practice.

Doctors should be checked to make sure that they are on the relevant specialist register.

The online registration check should be carried out:

- On initial recruitment;
- Prior to each new assignment;
- Monthly for working candidates.

Care Workers should also be checked against the alert notices provided by the professional registration bodies to ensure that there are no restrictions to practice or any current investigations.

Offer of employment

Following the interviews a provisional offer subject to pre-employment checks will be issued to the successful candidate advising them of the outcome. Checks will include receipt of two satisfactory references, verification of identity, Disclosure and Barring Service clearance, criminal record information and barring lists, verification of relevant qualifications and right to work in the UK for non- European Economic Area nationals.

It must be made clear to staff without completed DBS clearance, they would receive additional supervision until they have full DBS disclosure.

Acceptance of offer

Following the acceptance of an offer of employment, a personnel file will be created for the new staff member and must adhere to schedule 3 in the health and social care act 2008 by including:

- Proof of identity (including a recent photograph)
- DBS check
- References including reasons for leaving previous employment (should the staff member have worked with vulnerable people)
- Qualification documentation
- A full employment history
- Satisfactory information about any physical or mental health conditions



Key Question: How does a DBS check work?

All candidates must disclose details of any criminal convictions on the registration form. An enhanced criminal record check (including a barring check) will be made on initial recruitment of all candidates and annually thereafter.

On occasions where there are convictions shown on the disclosure the case must be reviewed by a Careville Ltd Recruiting Manager. A decision will be made and supported by at least 2 senior managers of Careville Ltd as to whether the candidate is suitable for employment. If the candidate is approved for work the details of the convictions must be made clear to the Client to allow them to make a decision to accept the candidate for work in line with their own policies and practices.

All disclosures are treated with the utmost confidentiality and are stored securely. Following review of the document only the top section will be retained in the candidate file.

Overseas police checks will be obtained and verified where the candidate has been living in the UK for less than 1 year. The checks must be gained from the country of origin/residence. An enhanced disclosure is still required.

Disclosure information is only passed to those who are authorized to receive it in the course of their duties. We maintain records of all the Disclosure information which has been revealed and we recognize that it is a criminal offence to pass this information to anyone who is not entitled to receive it.

Once a recruitment (or other relevant) decision has been made, we do not keep disclosure information for any longer than is absolutely necessary. This is generally for a period of up to 12 months, or until our regulators Care Quality Commission, Care Inspectorate (Scotland) and Regulation and Quality Improvement Authority (Northern Ireland) have inspected.

If it is considered necessary to keep disclosure information for longer than 12 months, we will consult the disclosure bureaus about this and will give full consideration to the Data Protection Act and the Human Rights of the individual subject before doing so.

Criminal record checks (disclosure and barring service check)

If a DBS Disclosure indicates a "positive Disclosure", the prospective employee must immediately be withdrawn pending the completion of a risk assessment by a senior manager, which will include further referencing.

The term "positive disclosure" refers to a disclosure containing information relating to convictions, cautions, reprimands etc., together with any "soft" information relating to non convictions that the police deem relevant.

Where a "positive" disclosure has been received, the following key stages must be followed by the relevant parties:

- The Lead Recruitment staff will notify the Registered Manager within 2 working days of receipt of the "positive" disclosure.
- The Registered Manager will forward the relevant copy of the risk assessment tool to the Lead Recruitment Staff to complete with the candidate/employee/volunteer (if the disclosure does not indicate otherwise).

- Where the disclosure is sufficiently concerning to believe that a child or adult may be at risk of significant harm if the person was to have contact with children then they must not be employed until a discussion with the Local Safeguarding Team has taken place. If the adult is already employed/volunteering then the employer should consider whether suspension may be necessary pending the risk assessment being completed.
- It should be noted that in all cases a Formal Risk Assessment will be required to be undertaken. Upon completion of the risk assessment, irrespective of the level of seriousness, an interview must be arranged with the employee to explore the issues and circumstances. This interview must take place within 5 working days.

The meeting is an essential part of the process, as it is necessary to verify that the information contained on the disclosure does indeed relate to the individual concerned. This verification must be sought prior to any judgments being made. There have been occasions where DBS system errors have occurred and information supplied has been wrongly attributed to individuals.

Once the risk assessment has been carried out and a decision made, the form must be forwarded to the Registered Manager, which will then be reviewed and signed off. Any disclosures which raise child protection issues will also be referred to the LADO (Local Authority Designated Officer) before any approval. This may necessitate the holding of a strategy meeting, if recommended by the LADO.

- Positive DBS disclosures concerning relevant third party information.
- Employees/volunteers may not have convictions or relevant 'soft' information in their own right. However, they may be in a relationship or related to someone who has or continues to be a risk to children or vulnerable adults through their own behavior/convictions. It may be through this relationship that children may be groomed or vulnerable to abuse and therefore it is important to consider whether the employee/volunteer may pose a risk to children due to their position of trust and relationships they form with children, young people and families, not just within the hours of their employment/volunteering, but also within the community.
- Therefore, when information about a third party is contained on an employee's/volunteer's DBS Disclosure, this is because the police believe it to be relevant to the role that individual will have in their employment/volunteering activities. Careville Ltd will undertake the risk assessment with the individual and assess what risks, if any, the individual may pose due to their relationship with the offender; their insight into the offending and what may need to be put in place to manage these risks and if this is possible. Careville Ltd will
- also consider the position of trust that any adult in an organization will have regardless of their direct or indirect role with children and families.
- Employers must remember that the safeguarding of children and Adults people is the paramount concern in these situations.
- Employers may discuss such cases with the LADO who will be able to offer advice and guidance regarding the assessment of risk.

Additional Guidance on making a decision to confirm employment:

It is not possible to provide a 'tariff' of offences since decisions are made taking all of the above factors into account. It is acceptable for a staff member with a criminal conviction to be hired, providing the company can explain the decision and verification

with evidence. The following anonymity examples provide an illustration of the reasoning behind decisions. In making any decision it is vital that all other pre-employment checks are considered satisfactory. References must have been verified with all previous employer by telephone.

Example 1 Shoplifting conviction 11 years before application. Conviction declared. No further offences since.	Decision: Accept
Example 2 Two convictions for drug offences 5 years before application. Not declared.	Decision: Reject
Example 3 Caution for possession of controlled drug 4 years before application. Caution declared. No further offences. Supportive references.	Decision: Reject
Example 4 Cautioned for theft 5 years before application. Not declared. A juvenile offence which the applicant believed would not remain on record. No offences since.	Decision: Accept
Example 5 6 convictions for various offences over 17-year period. Not all declared.	Decision: Reject (due to nature of offences and substantial under-declaration).
Example 6 12 offences, including theft, offence against property and public disorder offences over 19-year period. Not declared.	Decision: Reject

In addition, all staff should be aware that statutory guidance makes it clear that serious sexual, violent, drug or drink offences would give rise to a particular concern where a position was one of providing care. It is important to note that driving or drink offences would be relevant in situations involving transportation of children or vulnerable adults.

Whilst offences which took place many years in the past may often have less relevance than recent offences. Convictions for serious violent or sexual offences or serious offences involving substance abuse are more likely to give cause for concern than, for instance, an isolated case of dishonesty committed when the person was young. The potential for rehabilitation must be weighed against the need to protect children and vulnerable adults.

Once all relevant parties have agreed to the decision, the Registered Manager will receive the original risk assessment form and should keep this in a secure place with the individuals personnel file and a note should be made on the Single Central Record regarding the positive DBS. (i.e. with an asterix denoting further information is available on the personal file).

The risk assessment must be reviewed every year by the employer and updated If an individual is found to be on the DBS barring lists they must not be employed in any regulated activity which would preclude their employment by Careville Ltd due to the nature of the people we support and the services we provide.

Occupational health

A health questionnaire must be completed by all candidates. This includes details of any illness in the past 12-months.

Candidates will be required to provide proof of immunity to:

- Measles;
- Mumps;
- Rubella;
- TB;
- Varicella;
- Hepatitis B.

Additional requirements for positions which involve exposure prone procedures:

- HIV status;
- Hepatitis C status;
- Hepatitis B surface antigen.

Results must be from an official source and be stamped and verified and must be in English.

All health documents should be sent to our Occupational Health provider for screening and a Certificate of Fitness obtained.

Any candidate who spends 3-months or more outside of the UK must be fully re-screened.

Changes in health issues must be notified to the candidate's Recruiting Managers.

Occupational Health checks and Certificates of Fitness are renewed at least every 12-months. Candidates must undergo MRSA and infection control training.

If a candidate becomes pregnant the client should be informed to ensure the risk assessments are carried out.

English language check

The ability to write and speak clear English should be established for each candidate.

For non-European clinical staff, we expect a minimum IELTS score of 7.5 and 7.0 as determined by the GMC, NMC and HCPC respectively, adhering to NHS requirements. European clinical staff are assessed through written appraisals and oral review to gauge their communication of English in listening, reading, writing and speaking to ensure English proficiency and safe care.

Indemnity insurance (medical malpractice) & professional bodies.

All candidates (except medical administration) should provide a copy of proof of current up-to-date cover for medical malpractice which is relevant for the type of assignment they will undertake.

Original certificates of professional bodies must be obtained and a copy taken for the file. This membership must then be verified with the professional body that it is full, current and active.

Step 7 – Probation and Monitoring

All appointments into the Company will be made subject to a probationary period of six calendar months. After three months, a review meeting will take place between the post holder and their line manager to discuss progress. At the end of the probationary period, and subject to a satisfactory report by the appropriate head of section or line manager, employees will be notified in writing that they have successfully completed their probationary period. The probationary period can be extended by a further 3 months should the individual's line manager consider this appropriate. In conjunction with the disciplinary policy, should any employee commit gross misconduct whilst in probation, it will lead to immediate dismissal.

Induction Programme

All new employees will be given an induction programme which will clearly identify Careville Ltd's policies and procedures, and will detail all training staff must undergo during their induction to the company.

Recruitment Monitoring

Careville Ltd seeks to recruit employees on the basis of their ability and the requirements of the post.

We want to ensure that no applicant receives less favorable treatment than another on the grounds of disability, gender, race, religion or belief, age, sexual orientation, marital status, parental status, caring responsibilities or hours of work.

In order to meet this commitment, all candidates are asked to complete a recruitment monitoring form enclosed with the application form. All completed monitoring forms will be treated as confidential. The form will be separated from the application form on receipt and those involved in the selection process will not have access to it. The information given by candidates will be solely used for the purpose of monitoring the recruitment process.

Exit Interviews: All employees who leave the employment of Careville Ltd voluntarily will have an exit interview before their last day of employment.

Exit interviews provide the opportunity for departing employees to discuss their reasons for leaving. The information provided is useful in identifying trends, learning and development and evaluating the effectiveness of HR policies and practices.

Recommendations made for change, or significant issues raised during the exit interview will be collated (taking confidentiality issues into account). The exit interview questionnaire will be retained on the employee's personal file.



Key Points to Take Away

- Staff are our most valuable asset. Our well managed and carefully co-ordinated Safer Recruitment processes ensure we attract the very best applicants who can add value and drive forward our quality standards.
- Our processes are clearly aligned and compliant with statutory obligations as means of safeguarding the entire organization, particularly service users.
- Through Safer Recruitment, we seek to identify not only those applicants who possess the skills, qualifications and experience, but those who share our ethos and values.
- We ensure fair and equitable access to employment opportunities at Careville Ltd, operating in line with relevant legislation.

Policy Review

A Director will review this policy at least once a year to make any updates needed.

Authorisation and Signature

This Policy is the authorised version agreed by the Directors of Careville Ltd. All employees are expected to follow this policy and failure to do so could result in disciplinary action.

Director's Signature

Director