

Policy

Recruitment

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1. Scope

This policy applies to all staff employed by Thanet Health Community Interest Company (TH CIC) but does not apply to:

- Non-clinical contractor appointments
- Secondment appointments
- Volunteers
- Honorary contracts

Any third-party supplier of workers to TH CIC must comply with the NHS employment checks standards, as set out in this policy.

Appointments of contractors involved in the delivery of clinical services must comply with the NHS employment checks standards, as set out in this policy.

2. Purpose

This policy details the process to be followed to ensure TH CIC fairly and cost-effectively recruits and selects the best quality staff, in the right numbers and with the applicable skills, knowledge, competence and experience to provide high quality service delivery, and to ensure recruitment procedures are consistent with safer recruitment good practice and within legal requirements.

The aims of this policy are to:

- Enable the appointment of the best possible candidates for vacant posts with the organisation.
- Set out a fair, transparent and efficient approach to recruitment and selection within the organisation, that focuses on the candidate experience.
- Confirm roles and responsibilities of those involved in the recruitment and selection process.
- Meet the operational requirements and strategic aims of the organisation.

3. Responsibilities

It is the responsibility of the HR Department to monitor the effectiveness of this policy and report the results at management reviews.

It is the responsibility of Directors and Hiring Managers to ensure that this policy is implemented.

It is the responsibility of all employees involved in the recruitment process to comply with this policy.

It is the responsibility of all employees involved in the recruitment process to report any improvement suggestions to the Information Security Lead.

4. Definitions

Hard to Recruit Posts: Individual jobs or groups of jobs where labour market pressures make it difficult for employers to recruit and retain staff in sufficient numbers.

Honorary: Someone who undertakes work within the organisation but who is not directly employed by TH CIC.

Job Sharing: A way of enabling two employees to cover one post. Each person has a permanent part-time post and split the hours, pay, holidays and benefits between them according to how many hours they each work.

Longlist: A list of selected candidates from which a shortlist is to be compiled.

Secondment: The detachment of a person from their regular role for a temporary assignment elsewhere, internally or to another organisation, for a specific purpose and time, to the mutual benefit of both the staff member and the organisation.

Shortlist: A list of candidates who have been selected from the longlist of candidates who have evidenced that they meet the person specification for a vacant post through their application.

Volunteer: Someone who provides their time, for no payment, in order to enhance service delivery. They complement roles performed by paid staff, but do not replace them.

5. Equality Statement

The organisation is committed to promoting positive measures that eliminate all forms of unlawful or unfair discrimination not relevant to the requirements of the post.

The full **Equality, Inclusion and Diversity Policy** can be found in the **Employee Handbook**.

6. Recruitment Process

6.1 Creating / Requesting a Post

A post vacancy may arise for one or more reasons. Examples include:

- To replace an existing member of staff who has served notice on their intention to leave the organisation.
- A new service for which additional resource is required.

- An increase in provision of an existing service requiring additional resource.
- Short-term cover for an existing employee who will be taking time out of the organisation.

The department manager must identify the recruitment need and make a request to the Directors for the post to be approved for recruitment.

6.2 Post Approval

All post vacancies must be approved by the Directors prior to any recruitment campaign commencing.

As part of the approval process, the Directors must ensure that the post is budgeted for within the framework of any contractual terms for service provision or that organisational finances can support the recruitment.

The Directors must agree on the salary / salary band for the post vacancy and, where applicable, the duration of the contract term.

6.3 Planning Recruitment Campaign

The Hiring Manager must work with the HR Department to proactively plan the recruitment campaign. This should include:

- Producing / reviewing the job description.
- Producing / reviewing the person specification.
- Producing / reviewing the wording of the job advertisement.
- Considering the use of appropriate assessments to measure the competencies and key skills within the person specification.
- Determining the makeup of an appropriate selection / assessment panel.
- Confirming dates for advert go live / closing, shortlisting, interviews and assessments.

For hard to recruit posts, discussions should also be held to determine appropriate attraction methods.

If a relocation package is to be offered, this must be agreed by the Directors and offered in accordance with the **Relocation Expenses Policy**.

6.4 Advertising

Job advertisements should be taken as an opportunity to attract the right candidates and promote the organisation to prospective employees.

Advertisements should reflect the organisation's commitment to equality of opportunity and should not discriminate, directly or indirectly, against any potential candidate.

Advertisements must also state the organisation's commitment to safeguarding through safer recruitment practices.

As standard, vacant posts will be advertised for 14 calendar days but longer or shorter periods may be used when appropriate.

Advertisements may be internal and or external. Where external advertisements are used, NHS Jobs shall be the preferred platform. Agencies, and similar, must not be used without prior agreement of the Directors and with full understanding of all costs.

Where a Certificate of Sponsorship may be required, the post must be advertised for 29 days externally on at least two platforms, one of which must be NHS Jobs, and must meet all current legal requirements.

All posts must be advertised with a job description and person specification. Where the role requires additional risk assessment as part of the recruitment process (for example roles that come into contact with children, vulnerable adults or their families), and meets eligibility criteria for criminal record checks (ref Section 7.3), the advert should clearly state: ***'Disclosure and Barring Service Check***

This post is subject to the Rehabilitation of Offenders Act (Exceptions Order) 1975 and as such it will be necessary for a submission for a Disclosure to be made to the Disclosure and Barring Service (formerly known as CRB) to check for any previous criminal convictions.'

Vacant posts with a high number of applicants may be closed before the stated closing date where it is deemed the candidate pool is adequate for the number of vacancies.

When advertising for a partner for an existing employee to job share, the post must specifically be advertised as a job share. However, if a complete post is vacant but open to a possible job share, the post must be advertised as full-time with the following statement: ***'Applications are welcome from people wishing to job share, either with or without a job share partner.'***

6.5 Longlisting

If a post attracts a high number of applicants, the HR Department may long list initially, using some or all the essential criteria, to create a pool of candidates to be shortlisted.

Notes must be made on each applicant record of the reasons why they are not to be shortlisted.

6.6 Shortlisting

The HR Department shall submit anonymised applications to the Hiring Manager for shortlisting, to ensure fairness and consistency.

The Hiring Manager and their recruitment team must use the person specification as their basis for shortlisting criteria. The criteria must be compiled, recorded and applied consistently for all candidates using only the information submitted in their application.

If an applicant has declared on their application form that they have a disability, and they meet the minimum criteria for the role, they are to be guaranteed an interview under the Disability Confident Employer Scheme.

Candidates who are not shortlisted must be notified that they have been unsuccessful. If they request feedback, this must be given in a timely manner.

Candidates who have relatives working within the organisation, must not be interviewed by that relative.

6.7 Interviews

Shortlisted candidates shall be contacted and invited to attend an interview. Clear instructions must be given as to the time and place of the interview and the format that it will follow.

If any assessment method is to be used during the interview, this must be made clear within the invite.

Applicants must be asked to confirm their attendance. Date / time slots must be offered on a 'first come first served' basis. If a candidate is unable to attend on any of the available date / time slots, every reasonable effort should be made to offer an alternative. However, the recruitment process must not be unduly delayed accommodating an individual.

Interview panels must consist of at least two people, and one must be senior to the role being interviewed. At least one panel member must also have completed Safer Recruitment training.

The interview shall focus on satisfactory demonstration of the organisation's values, competences, experience and other criteria outlined in the person specification, to determine whether a candidate has the capability and requisite competencies required to perform the role effectively.

Hiring managers must declare any conflict of interest relating to any candidate and must not be involved in the assessment of that candidate.

Candidates applying for a job share must be interviewed individually to determine their suitability for the post.

6.8 Assessments

Assessments are designed to ensure candidates' suitability for the role and to provide candidates with a realistic overview of the role. In order to ensure there is evidence that areas of the person specification that are particularly critical to success in the post are assessed, candidates may be required to undertake such job-related selection assessments.

The use of assessments may be suitable for some posts. This must be decided, and the type of assessment agreed, at the start of the recruitment campaign and candidates invited to interview must be made fully aware.

All candidates must be provided with the same information regarding the selection process and undertake assessments under the same conditions, except where reasonable adjustments are made for candidates who have declared a disability on their application.

The final decision regarding the candidate to be appointed will incorporate the outcome of both the assessment centre scores and their performance at interview.

It may be prudent for the selection panel to identify a first reserve (possibly even a second reserve) who must be of a sufficient standard that they would have been offered the post had the preferred candidate not submitted an application.

6.9 Post Selection

Hiring Managers must communicate the outcome of the selection process to the successful candidate. Should they not want to accept the post, it should be offered to a pre-agreed reserve.

The Hiring Manager must also communicate the outcome to all unsuccessful candidates. If feedback is requested, this should be provided in a timely manner.

The HR Department shall issue a written conditional offer of employment to the successful candidate, which must be subject to satisfactory pre-employment checks. They must also be requested to complete a **Self-Declaration Form** appropriate for the role.

7. Pre-Employment Checks

The organisation must undertake pre-employment checks in line with current legal requirements and NHS Employers Standards. The organisation must also comply with CQC guidance and the Health and Social Care Act 2008 (Regulated Activities) Regulations 2010 to ensure safe recruitment.

Checks to be undertaken include:

- Verification of identity.
- Right to work.
- Criminal record.

- Qualifications and registration.
- Employment history and references.
- Work health assessments.

7.1 Verifying Identity

The purpose of this check is to verify the identity of all prospective employees.

The organisation must conduct this check in accordance with the latest version of the NHS Employers **Identity Checks** document available on the NHS Employers website:

<https://www.nhsemployers.org/topics-0/employment-standards-and-regulation>

All documents must be originals or certified copies which are valid, dated and current.

Identity documents must be checked and photocopied with the copy being signed and dated to verify the original documents have been seen. The copies must be retained in the personnel file.

7.2 Right to Work

The purpose of this check is to determine that all employees have a legal right to work in the UK.

The organisation must conduct the check in accordance with the latest version of the NHS Employers **Right to Work Checks** document available on the NHS Employers website:

<https://www.nhsemployers.org/topics-0/employment-standards-and-regulation>

Evidence documents must be checked and photocopied with the copy being signed and dated to verify the original documents have been seen. The copies must be retained in the personnel file.

7.3 Criminal Record Checks

The purpose of this check is to ensure unsuitable people are prevented from entering the workforce and gaining access to individuals who may be vulnerable.

The organisation must conduct the check in accordance with the latest version of the NHS Employers **Criminal Records Checks** document available on the NHS Employers website:

<https://www.nhsemployers.org/topics-0/employment-standards-and-regulation>

Such checks must also comply with the **Policy Statement on the Secure Storage, Handling, Use, Retention and Disposal of Disclosures and Disclosure Information** available in the **Employee Handbook**.

Disclosure and Barring Service (DBS) checks must be carried out in accordance with the **Criminal Record Check Policy**.

7.4 Qualifications & Registrations

The purpose of this check is to ensure that, where qualifications and / or professional registration are a requisite for a post, candidates can provide evidence that they meet all requirements.

The organisation must conduct the check in accordance with the latest version of the NHS Employers **Professional Registration and Qualification Checks** document available on the NHS Employers website: <https://www.nhsemployers.org/topics-0/employment-standards-and-regulation>

Documents must be checked and photocopied with the copy being signed and dated to verify the original documents have been seen. The copies must be retained in the personnel file.

For professional registrations, checks must be carried out directly with the relevant regulatory body. For posts requiring professional registration, employees **MUST NOT** commence duties until checks are completed satisfactorily.

7.5 Employment History and References

The purpose of this check is to verify the accuracy of a prospective employee's previous employment and provide assurance of their experience, qualifications and employment history.

The organisation must conduct this check in accordance with the latest version of the NHS Employers **Employment History and Reference Checks** document available on the NHS Employers website: <https://www.nhsemployers.org/topics-0/employment-standards-and-regulation>

The organisation shall aim to obtain references covering at least the previous three years of employment and / or training (five years for senior roles) including a reference from the most recent employer.

References shall be requested in writing (email format is acceptable) by the HR Department once a candidate has been selected and a conditional offer of employment made. Candidates shall be asked to confirm their permission for references to be obtained.

References shall be requested using an appropriate template: **Clinical Reference Questionnaire** or **Reference Questionnaire** and be accompanied by a **Reference Request Letter**.

Where a candidate has not been in employment, educational references within the last three years preceding the application shall be requested.

If the applicant has been self-employed, evidence shall be obtained to confirm dates of employment and any other information such as confirmation that the individual's business was properly conducted, shall be sought.

Once received, references must be reviewed by the HR Department and Hiring Manager to check for any inconsistencies between them and the application. Any such consistencies must be discussed with the applicant.

References shall be retained on the personnel file.

7.6 Work Health Assessments

The purpose of this check is to ensure that prospective employees are fit to undertake the duties proposed.

Health assessments must only take place **AFTER** any offer of appointment (whether conditional or unconditional), but prior to the commencement of employment.

The organisation must make this check in accordance with the latest version of the NHS Employers **Work Health Assessments** document available on the NHS Employers website: <https://www.nhsemployers.org/topics-0/employment-standards-and-regulation>

If a prospective employee indicates they do have a health condition or disability that may affect their work, the organisation may need use an expert occupational health specialist to determine any special adjustments to be made to either the work or place of work.

8.0 Additional Checks

Depending upon the post, other checks may be appropriate to ensure that all reasonable efforts have been made to identify any potential problems that could prevent an applicant from fulfilling their duties.

8.1 DVLA Driver Check

The purpose of this check is to comply with the organisation's duty of care to ensure that employees who drive as a part of their role are legally permitted to do so.

The organisation must carry out a driver check for all employees operating in a role where driving on public roads, either using their own vehicle or one owned by the organisation, forms a part of that role.

This check must be made in accordance with the **DVLA Driver Check Policy**.

Where an employee uses their own vehicle for work purposes, the organisation shall also check they have up to date business insurance in place and they have a valid MOT certificate for the vehicle(s) they use.

The results of these checks must be recorded in the **Thanet Health CIC Driver Checks** register.

8.2 Performers List Check

The purpose of this check is to ensure that any GP, dentist or optometrist employed by the organisation is listed on the appropriate Performers List.

All GP's, dentists and optometrists offering primary care in an NHS setting are required to be registered on the relevant Performers List for England. These lists are managed by Primary Care Support England (PCSE).

The organisation shall search the relevant register on the PCSE website: <https://secure.pcse.england.nhs.uk/PerformersLists> to ensure that the details of the employee in question are registered.

8.3 HPAN Checks

The purpose of this check is to identify Health Professional Alert Notices pertaining to employees.

NHS Resolution may issue a Healthcare Professional Alert Notice (HPAN) about a registered health care professional whose conduct or practice would pose a significant risk to patients, staff or the public.

An HPAN will confirm whether the person may continue to work, or seek additional other work, in the NHS as a healthcare professional or whether that person falsely holds themselves to be a healthcare professional.

If an individual is subject to an alert notice, the organisation must check whether there are any restrictions which would prevent them from undertaking the duties of the role being applied for, prior to allowing them to take up a post.

The organisation shall undertake these checks by sending an email to nhsr.hpanchecks@nhs.net detailing the applicant's full name, their regulating body and their professional PIN.

8.4 Mandatory Training

The purpose of this check is to ensure that all mandatory training has been completed and is up to date.

Mandatory training is that which is determined essential by an organisation for the safe and efficient delivery of services. This type of training is designed to reduce organisational risks and comply with local or national policies.

The organisation must ask prospective employees to provide evidence that all mandatory training is up to date. The training modules required will be dependent on the role to be fulfilled.

The preferred evidence is completion certificates for each module but a training summary showing completed modules and the dates they were completed may be acceptable.

Details of mandatory training, including any applicable expiry dates, must be kept on a **Thanet Health CIC Core Training** spreadsheet and copies of completion certificates must be retained in the personnel file.

8.5 Fit and Proper Persons Test

The purpose of this check is to ensure that all Directors meet the requirements of the Fit and Proper Persons Test as per the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014.

All Directors, whether executive or non-executive, must undergo a Fit and Proper Persons Test to ensure that they are suitable for the role, meet the fitness criteria and do not meet the unfitness criteria.

The organisation must carry out this check in accordance with the **Fit and Proper Persons Test Procedure**.

9. Conditional Offer

While pre-employment checks are being undertaken, a conditional offer of employment may be made. It must be made clear that this offer is subject to the satisfactory completion of all checks.

Offers must not be put in writing until the candidate has provided sufficient evidence to prove their identity and right to work in the UK.

A new employee may only join the organisation before the completion of all pre-employment checks in exceptional circumstances, or when a risk assessment has been completed by the Hiring Manager and approved by a Director.

If the organisation finds that pre-employment checks are not satisfactory, the offer of employment may be withdrawn. See Section 10.

10. Withdrawing Conditional Offers

Where pre-employment checks are found to be unsatisfactory, the organisation must decide whether the offer of employment should be withdrawn.

If the offer is to be withdrawn, the candidate must be notified in writing with '*failure to satisfy pre-employment checks*' given as the reason. However, if a risk assessment has been carried out, the applicant may be allowed to start work on a conditional basis while further investigation is undertaken.

Where an employee has commenced employment on a conditional basis, pending completion of pre-employment checks, and these turn out to be unsatisfactory, the HR Department will take the necessary action to terminate the employee's employment giving '*failure to satisfy pre-employment checks*' as the reason.

11. Contract of Employment

Once all pre-employment checks have been completed, the HR Department shall issue an appropriate Statement of Main Terms of Employment / Statement of Engagement to the candidate on, or before, their first day of work.

As a minimum, this document must include:

- The employer's name.
- The employee or worker's name.
- Start date (day the employee / worker starts work).
- The date continuous employment (working for the same employer without a significant break) started for the employee.
- Job title.
- The employer's address.
- The places or addresses where the employee / worker will work.
- Pay (amount, how often and when).
- Working hours, including which days the employee / worker must work and if and how their hours or days can change.
- Holidays and holiday pay, including an explanation of how its calculated if the employee / worker leaves.
- The amount of sick leave and pay (if this information is not included in the document, the employer must state where to find it).
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- Any other paid leave (if this information is not included in the document, the employer must state where to find it).
- Any other benefits, including non-contractual benefits such as childcare vouchers or company car schemes.
- The notice period either side must give when employment ends.
- How long the job is expected to last (if it is temporary or fixed term).
- Any probation period, including its conditions and how long it is.
- If the employee will work abroad and any terms that apply.
- Training that must be completed by the employee / worker, including training the employer does not pay for.

If not included in the Statement of Main Terms of Employment / Statement of Engagement, other terms must be provided no later than two months after the first day of employment. These include:

- Pension arrangements (if this information is not included in the document, the employer must state where to find it).
- Any terms and conditions that also apply to other employees (collective agreements).
- Details of any training provided by the employer that is not compulsory (if this information is not included in the document, the employer must state where to find it).
- Disciplinary rules and disciplinary and grievance procedures.

The employee must be asked to read the document and ensure they fully understand it before signing and dating the declaration and returning a copy to the HR Department.

A signed and dated copy of the document shall be retained in the personnel file.

12 Information Asset Access

The organisation has a legal duty to protect the information assets that it controls and processes. Access to these assets must be strictly controlled.

Prior to the first day of employment, an employee's line manager shall request that access is granted to information assets necessary for the employee to carry out their role.

The request must be made using an **Information Asset Access Control Review** form.

Requests must only be made for access that is genuinely required as a part of the role. Access to other assets will be denied and may slow down the process.

The IT Department shall be responsible for arranging access to requested IT systems and providing initial login details to the employee.

A number of policies are in place regarding access to and the use of information assets. New employees must be made aware of these and the overriding **Information Security (General) Policy**.

13 Payroll

Once it has been confirmed that the employee is in post, all pertinent details must be sent to the Payroll Department as soon as possible.

These details must include:

- **New Starter Information form**.
- **NHS Pensions - New Employee Questionnaire**.
- P45 (from previous employer) or HM Revenue & Customs – Starter Checklist (formerly P46) available at: <https://www.gov.uk/government/publications/payee-starter-checklist>

14 Personnel File

Every new employee must have a personnel file set up that will contain all their personal details pertaining to their employment with the organisation.

The personnel file shall be held electronically on the secure Bright HR system.

15 Shadow Shifts

For some roles within the organisation, it may be deemed appropriate for an applicant to work a number of shadow shifts.

A shadow shift is a period of paid work where an applicant shadows an existing team member who themselves is experienced in the role. This provides an opportunity for the applicant to fully understand the nature of the role and work environment and for the organisation to assess their suitability.

For such roles, formal employment may only commence upon the successful completion of the shadow shifts.

16 Induction

All employees must undergo a formal induction upon commencing employment with the organisation.

The induction process is detailed in the **Employee Handbook** must be recorded on an **Induction Checklist** and retained in the personnel file.

Appendix 1 – People Who Have Completed Safer Recruitment Raining

Name	Position	Date Completed
Paul Ruprecht	Corporate Services Manager	14/02/2025
Sandra Houghton	Director of Primary Care	18/02/2025