

RECRUITMENT POLICY

Version History

Version	Date of Issue	Author/Dept	Change Summary
V7	29.12.2022	HR	Updating to new format

Equality Impact Assessment

All colleagues, contractors and third-party partners are required, when following this policy, to ensure that they do not disadvantage any resident or group on the grounds of race, religion or belief, age, sex, gender reassignment, disability, sexual orientation and/or caring responsibilities.

1 INTRODUCTION

This document sets out the safer recruitment and selection procedures which will be followed by The company and provides employees who have responsibility for recruitment and selection with guidance on legal requirements and best practice.

2 Recruitment and promotion

The company is an Equal Opportunities employer and will ensure that no applicant is discriminated against during the recruitment process or thereafter on the basis of age, gender reassignment, being married or in a civil partnership, [being pregnant](#) or on maternity leave, [disability](#), race including colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation.

As part of its commitment to safeguarding and promoting the welfare of vulnerable adults, a range of pre-employment checks will be undertaken on employees and volunteers and there is a requirement on external organisations providing workers to do the same.

The principles described in this policy will be applied in relation to everyone who applies to work in The company including:

- staff employed on a permanent basis,
- temporary and casual staff
- unpaid volunteers
- overseas workers (guidance available from UK Border Agency www.ukba.homeoffice.gov.uk)

- those employed by external organisations such as supply agencies

It is the responsibility of home managers and all those involved in the recruitment and selection process to:

- ensure that safe recruitment procedures are in operation and make sure all appropriate checks are carried out on all staff, volunteers and others engaged to work;
- ensure contractors' and agencies' compliance with this document;
- secure and promote the welfare of vulnerable adults at every stage of the process.

It is the responsibility of all potential and existing workers, including volunteers to comply with this document.

It is the responsibility of all contractors and agencies to comply with safe recruitment pre-employment checks.

The Company uses a recruitment Applicant Tracking System called Reach. Whilst this automates much of the recruitment process intervention is still required by both the candidate and the recruiting manager to ensure the process runs smoothly.

The recruitment process starts as soon as a vacancy has been identified. Before any action is initiated, careful consideration will be given to the necessity for filling the post, the tasks to be undertaken and the skills, attributes and behaviours required to do the job.

3 Job Descriptions/Person Specifications

A job description and person specification must be available for all vacancies before any recruitment activity commences. The job description will provide a framework of expectations and will define the purpose and the principal duties and responsibilities of the role. The person specification will enable applicants to assess themselves for the job and provides a benchmark for those involved in the selection process to judge suitability.

The job description and person specification will be used throughout the recruitment process to develop the shortlisting and selection criteria.

Line Managers are responsible for recruitment in conjunction with the HR department. Where recruitment is planned to fill a vacancy created by a leaver approval will normally be granted automatically. If however the Line Manager wishes to upgrade a post or create a new post then this must be supported by the Regional Operations

Director and the justification presented to the Board for approval, via the using the appropriate form - 'Payroll enhanced rate of pay form'.

If the line manager wishes to advertise a higher salary than the Company rate card or the previous role incumbent, authorisation must be sought from the Board, using the appropriate form – Payroll Enhanced Rate of Pay Form.

It is The company' policy to look to fill any vacancy by internal promotion or transfer wherever possible. A decision to advertise a position externally does not necessarily indicate that there are no suitable internal candidates.

All applicants for any position must be assessed objectively on their individual merits, in accordance with The company' Equality Policy.

Any person involved in the interview or selection process whose impartiality is compromised in any way in relation to an applicant must declare it immediately to their Line Manager and, if so required, withdraw from the interview/selection process either completely or in relation to that applicant.

It is essential that sufficient time is set aside by all those involved in the recruitment and selection process to ensure that safeguards are not overlooked.

4 Advertisements

All vacancies are to be requested using Reach ATS, whether being advertised internally or externally. All vacancies must be advertised internally. When requesting the advert you will need to state:

- The job title;
- The salary or pay scale/band applicable to the position;
- Any minimum qualifications for the position;
- Any particular skills and/or experience required for the position;
- Any atypical features of the position (e.g. part-time, fixed-term);
- The closing date for applications.

You must ensure that qualifications, skills and/or experience are as per the person specification for the role.

All adverts must include the statement "All appointments are subject to safer recruitment requirements to ensure the safeguarding of vulnerable adults. All positions will involve appropriate checks and clearances."

All adverts must include the statement "The Runwood Group is fully committed to the eradication of unlawful and unfair discrimination and values the differences that a

diverse workforce brings to the organisation. The Runwood Group will not discriminate because of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (which includes colour, nationality and ethnic or national origins), religion or belief, sex or sexual orientation’.

All employees are responsible for the promotion and advancement of this policy.

The Company is aware of its obligations under the Equality Act 2010. The commitment to monitor the composition of the existing workforce is set out in the Equal Opportunity Policy. In addition to the monitoring of appointment decisions on a monthly basis the Company also conducts an annual census of the workforce, who are invited to confirm personal data relating to them. This enables high level monitoring of the composition of the workforce. Disclosure of this personal information is of course discretionary.”

An internal advert will be prepared weekly and will be displayed on staff noticeboards. Existing employees are to be encouraged to apply for vacant posts if they have the appropriate qualifications, experience and skills. Internal staff applying for vacancies must apply using the link detailed on the internal advert for the particular vacancy.

Staff applying for internal vacancies must inform their current line manager of their intention to apply prior to submitting their application. Successful applicants will need to give 4 weeks’ notice to their previous department prior to a transfer being completed.

Managers must take care to avoid specifying requirements for the position which are potentially discriminatory, i.e. on the grounds of age, sex, race, religion or belief, sexual orientation, disability or trade union membership/non-membership. Discriminate can occur in a number of different ways:

- **Directly** – those which expressly or impliedly exclude applicants on one of the prohibited grounds (e.g. “would suit mum seeking flexible role”, “recent graduates sought for demanding new role...”).
- **Indirectly** – those which apparently treat everyone the same but do so in a way which adversely affects members of one protected class or category (e.g. “must be over 2m tall” (which excludes more women than men), “must be willing to work long hours” (also excluding women as they are more likely than men to be primary carers for young children), or “must have at least seven years’ experience” (excluding more young than old people). Any such statement must be a genuine requirement for the position.
- **Failure to adjust** - premises or working practices to accommodate a disability.

5 Recruitment Monitoring

The Company monitors certain aspects of recruitment practices including monitoring the ethnicity, disability and gender of applicants. As part of the application process therefore, individuals will be asked to provide this information. This information will not be available to the recruiting manager and will be used for monitoring a statistical data purposes only.

5 Applications and decisions

Recruitment decisions will be solely on the basis of the applicant's abilities and individual merit as measured against the criteria for the job. Qualifications, experience and skills will be assessed at the level that is relevant to the job.

All applicants must complete an application form. This may be the short online application form if they upload their CV as well.

Shortlisting should ideally be completed as soon as possible after the closing date however the selection process may commence before the closing date where is an urgent recruitment need and/or a number of the same vacancies exist at that location.

6 Interviews

Before conducting an interview, interviewers should ensure that they have a copy of the application form and the up to date approved interview questions template for the specific role.

6.1 At interview:

All candidates should have their attention drawn to this policy before interview. Candidates must be asked to provide their ID at interview to prove their right to work in the UK and to provide suitable evidence to allow a DBS/Access NI application to be made should their application be successful.

6.2 All Northern Ireland candidates should be made aware of the Access NI Code of Conduct and a copy made available should they request it.

6.3 Documents

Original documents must be produced and these must be copied at the time of the interview. Copies should be signed by the person checking the evidence and each document must state "original documents seen" and be dated. Original documents

must be checked to ensure they appear to be authentic and that any photographic identification bears a true likeness to the candidate presenting for interview.

If the candidate is subsequently unsuccessful all ID documents must be securely destroyed.

6.4 Interview process

The focus of the interview needs to be of the job and the skills needed to perform it effectively.

- A colleague should be present to take notes and, where appropriate, conduct the interview jointly;
- You must select questions from the interview questions template for the specific job role;
- No questions should be asked about an applicant's personal circumstances, even in small talk;
- No assumptions should be made about an applicant's willingness to undertake, or suitability for, the position;
- **In accordance with the Equality Act 2010, the interviewer must not ask general questions about the individual's sickness and attendance record but may ask relevant questions to establish whether the applicant will be able to carry out a function that is intrinsic (e.g. majority of the work**

involves manual handling) to the work concerned once reasonable adjustments are in place where appropriate.

Records of interviews for unsuccessful candidates will be retained for 6 months and then must be destroyed.

Where necessary tests will be carried out during the interview process. These may be written or practical tests, e.g. to observe how candidates interact with residents.

Following the interview candidates will, as soon as possible, either be notified that they were successful or unsuccessful.

7 Employment Offers

All offers of employment are made on a conditional basis. Managers should contact the individual by phone to inform the individual that an offer is being sent. Managers must ensure that they have the necessary authorisation before any offer is made, including verbal offers.

Successful candidates will be required to either accept or decline the offer of employment and if accepted will be required to complete employment forms, including information required to process the DBS/Access NI application, where applicable.

All staff working in one of our care and nursing homes will be subject to an enhanced DBS/Access NI check. Any other member of staff who undertakes 'regulated activities' will be subject to a basic DBS/Access NI check. Please refer to the Pre-Employment Checks policy for further guidance.

Managers must use the appropriate and up to date templates for offer letters and contract of employment.

8 Interview expenses

Interview expenses will not be reimbursed.

9 Pre-employment Checks

All prospective employees will be required to undertake suitable pre-employment checks before commencing employment. Full details are these and other background checks are outlined in our Pre-Employment Checks Policy.

Full guidance on pre-employment checks, including assessing suitability in the event of a positive criminal record disclosure is contained in the Pre-employment Checks Policy.

Evidence of compliance with current mandatory requirements for vaccinations (or official evidence of medical exemption) is a compulsory pre-employment check.

10 Employment of ex-offenders

The Company fully complies with the requirements of the Department of Justice in connect with the use of information provided to registered persons, their nominees and other recipients of information by Access NI/Disclosure & Barring Service under Part V of the Police Act 1997, for the purposes of assessing Applicant's suitability for employment purposes, voluntary positions, licensing and other relevant purposes. The Company will treat all applicants for positions fairly.

The Company will assess any criminal conviction as set out below to arrive at a fair and balanced decision. Positive disclosures will be managed in line with the DBS/Access NI Code of Practice.

At all stages the Company will seek to conduct open, measured and recorded discussions with candidates on the subject of any offences or other matters that might be considered relevant for the position.

The following factors will be considered:

- The seriousness/level of the disclosed information, e.g. was it a caution or a conviction.
- How long ago it occurred.
- Whether it was a one-off incident or part of a repeat pattern/history.
- The circumstances of the offence(s) being committed and any changes in the applicant's personal circumstances since then.
- The country where the offence/caution occurred.
- Whether the offences were self-disclosed or not. If they were not non-disclosure could in itself result in non-confirmation of employment on the grounds of trust, honesty and openness
- Serious sexual offences, assault or theft offences are likely to be considered to exclude an individual from employment with the Company.

11 Employment of Young Workers

11.1 In England, until reaching the age of 18, school leavers must either:

- stay in full-time education, for example at a college
- start an apprenticeship or traineeship
- spend 20 hours or more a week working or volunteering, while in part-time education or training

The Company/Sanders Senior Living will only employ school leavers subject to an apprenticeship arrangement, or where the candidate has evidenced continued part time education or training – this would be for a maximum of 20 working hours per week. Employment will then be subject to the specific guidance on working hours for young workers in the Company's QD-HR-39 Working Hours Policy, and the Young Person's Risk Assessment (CH27) being completed and in line with QD-HS-001 Health and Safety Manual, 4.3.5 Young People at Work.

Please note that where a local authority operates any "Young Person's Permit to Work" scheme or similar, this must be adhered to.

11.2 Kathryn Homes will only employ those under the age of 18 subject to the specific guidance on working hours for young workers in the Company's QD-HR-39 Working Hours Policy, and the Young Person's Risk Assessment (CH27) being completed and in line with QD-HS-001 Health and Safety Manual, 4.3.5 Young People at Work.

12 Probation

A probationary period applies to all newly appointed staff to the Company.

See the Probation Policy for more detail.

13 Selection Records

Interview notes on all applicants will be retained for a 6 month period, after which time these records will be destroyed securely (i.e. shredded). The 6 month retention period will allow the company to deal with any data access requests and respond to any complaints raised at an Employment Tribunal.

Applicants have the right to request access to notes written about them during the recruitment process. Applicants who wish to access their interview notes must make a subject access request in writing within 6 months from the date of interview.

14 Staff Files

For the successful candidate, the following information will be retained and will make up part of that employee's Staff File:

- Application form
- Criminal Records Declaration Form (until DBS/Access NI clearance is received, at which point the self-declaration form should be removed and destroyed)
- Proof of identity
- Evidence of the right to work in the UK and any supporting documents
- Proof of required qualifications
- Certificate of good conduct (where applicable)

- Completed pre-employment health declaration form (not the full questionnaire if required).
- Evidence of medical clearance (from Occupational Health if required)
- DBS/Access NI consent form (until clearance is received, at which point form should be removed and destroyed)
- Evidence of the DBS/Access NI check or online status check (not the certificate)
- Evidence of the Adults Barred List check
- Evidence of safeguarding check (if applicable)
- DBS risk assessment form (where applicable, e.g. a positive disclosure)

15 Engaging Volunteers

The Company values the contribution that volunteers make to its resident community. Volunteers are seen by residents as safe and trustworthy members of staff and the same high standards of safer recruitment principles and processes must therefore be applied to volunteers.

New volunteers attending any of our care and nursing homes must be DBS/Access NI checked at the enhanced level. All volunteers must also complete a Self-Declaration Form.

Please see the separate Volunteer Policy **QD-HR-37**.

Appendix 1

Interviewing

Interviews

The selection process should always include a face-to-face interview. This provides the opportunity to explore any questions that arise from the application. The interview will assess the merits of each candidate against the job requirements, and explore their suitability to work with vulnerable adults.

A suitable interview room and waiting area should be available taking into account the needs of any disabled applicants.

Involving Residents

The Company consider it to be good practice to involve residents in the recruitment and selection process in some way, or observing short listed candidates' interaction with residents.

It is important to ensure that candidates are supervised at all times and are never left alone with residents.

Interview Questions

The interviewing manager must select questions from the applicable and most up to date interview questions template and these should be selected in advance of the interviews. A candidate's response to those questions will determine whether and how it is followed up.

It is acceptable to ask different supplementary questions of candidates based on their application and responses.

Where possible it is best to avoid hypothetical questions because they allow theoretical answers. It is best to ask competence based questions that ask a candidate to relate how they responded to, or dealt with, an actual situation, or questions that test a candidate's attitudes and understanding of issues.

In addition to assessing and evaluating the candidates' ability to perform the duties of the post, the interview should also explore issues relating to safeguarding and promoting dignity and independence of residents including:

- The candidate's attitude toward vulnerable adults and those living with dementia
- Motivation to work with vulnerable adults;
- Ability to form and maintain appropriate relationships and personal boundaries with vulnerable adults;
- Emotional resilience in working with challenging behaviours;
- Previous experience of working with vulnerable adults

Other issues that must be covered include:

- gaps in the candidate's employment history and a satisfactory explanation sought
- reasons for any history of repeated changes of employment.
- Other concerns or discrepancies arising from the information provided by the candidate.
- Have a preliminary discussion regarding any declarations made on the SD2 form.
- The manager should also ask the candidate if they wish to declare anything in light of the requirement for an enhanced DBS disclosure/Access NI.

At interview

On arrival an appropriate member of member of staff (i.e. Home Manager, Deputy or Home Administrator) must verify that the documents the candidate has brought with them are original and take a photocopy. For the successful candidate these should be retained in the staff file.

For unsuccessful candidates this will be kept with the recruitment paperwork for 6 months, before being destroyed.

During the interview the manager should explain:

- the interview structure, including the fact that notes will be taken
- provide important details of the post, including number of hours per week, shift patterns, and salary details.
- when the candidate can ask questions
- close the interview and explain the next stage i.e. when the candidate will be notified of whether they have been successful.

It is important to keep the interviews to time. Interviews invariably take longer than expected so it is important to allow sufficient time for each candidate. Extended interviews are often counter-productive for both the candidate and the panel.

It should be remembered that applicants are entitled to have access to all interview notes made (about them) which must be retained as part of the record of the interview. It is important therefore to avoid making personal comments on the interview notes. All interview notes must be retained for 6 months, after which they should be destroyed.

EQUALITY IMPACT ASSESSMENT TOOL – (NAME)

Equality Impact Assessment Tool		Yes/No	Comments
1	Does the policy affect one group less or more favourably than another on the basis of:		
	• Race	No	
	• Ethnic origins	No	
	• Nationality	No	
	• Gender	No	
	• Culture	No	
	• Religion or belief	No	
	• Sexual orientation	No	
	• Age	No	
2	Is there any evidence that some groups are affected differently?	No	
3	If you have identified potential discrimination, are any exceptions valid, legal and/or justifiable?		
4	Is the impact of the policy/guidance likely to be negative?		
5	If so can the impact be avoided?		
6	What alternatives are there to achieving the policy/guidance without the impact?		
7	Can we reduce the impact by taking different action?		

If a potential discriminatory impact of this procedural document is found, please refer it to the HR department and Governance department, together with any suggestions as to the action required to avoid/reduce this impact

