

Recruitment Policy

Response Healthcare Solutions Ltd

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1. Introduction and Purpose

1.1 Policy Overview

This Recruitment Policy sets out the framework and procedures that Response Healthcare Solutions Ltd ("RHS", "the Company") follows when recruiting and selecting employees, workers, contractors, volunteers, and other personnel. The policy is designed to ensure fair, transparent, and non-discriminatory recruitment practices while maintaining full compliance with employment law, data protection regulations, and healthcare sector standards.

1.2 Legal Framework

This Policy is established to ensure compliance with:

- Employment Rights Act 1996
- Equality Act 2010 (including protected characteristics and discrimination provisions)
- Data Protection Act 2018 (recruitment data processing)
- General Data Protection Regulation (UK GDPR)
- Immigration, Asylum and Nationality Act 2006 (right to work verification)
- Health and Social Care Act 2008 (Regulated Activities) Regulations 2014
- Care Inspectorate Standards and Guidance (Scotland)
- Modern Slavery Act 2015 (transparency and due diligence)
- Public Services (Social Value) Act 2012 (where applicable)
- Human Rights Act 1998 - Article 8 (right to private and family life)
- Health and Safety at Work etc. Act 1974
- Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975
- Safeguarding Vulnerable Groups Act 2006 (Disclosure and Barring Service)
- General Data Protection Regulation (Overseas Transfers) Regulations 2019

1.3 Scope of Application

This Policy applies to:

- All recruitment of permanent employees
- All recruitment of temporary and fixed-term employees
- All recruitment of agency and casual workers
- All recruitment of contractors and consultants
- All recruitment of volunteers
- All recruitment of students on placement
- All appointment of Board members or governance roles
- All appointment of directors or senior management positions

The Policy applies to all recruitment stages from advertising through to onboarding and employment commencement.

1.4 Policy Principles

RHS recruitment is based on the following core principles:

Merit-Based Selection: Recruitment decisions are made solely on the basis of the skills, experience, qualifications, and suitability of candidates relative to the role requirements.

Fair and Transparent: All candidates are treated fairly and consistently throughout the recruitment process. The process is transparent, with clear criteria, timescales, and feedback.

Non-Discriminatory: Recruitment practices comply fully with the Equality Act 2010. No candidate is discriminated against on the basis of protected characteristics (age, disability, gender reassignment, marriage/civil partnership, pregnancy/maternity, race, religion/belief, sex, or sexual orientation).

Data Protection Compliant: All recruitment personal data is processed in accordance with UK GDPR and Data Protection Act 2018.

Safeguarding Focused: Recruitment includes appropriate safeguarding checks and vetting to protect vulnerable persons and maintain service quality.

Professional Conduct: All recruitment staff conduct themselves with professionalism, confidentiality, and integrity.

2. Recruitment Overview

2.1 Recruitment Planning

Before commencing recruitment:

RHS identifies the need for a new role through:

- Resignation or departure of existing employee
- Creation of new role due to business expansion
- Restructuring or reorganisation of existing roles
- Temporary replacement due to illness or sabbatical leave

The role requirements are defined including:

- Job title and reporting structure
- Key responsibilities and duties
- Knowledge, skills, and experience required
- Qualifications and certifications required (if applicable)
- Salary and benefits package
- Contract type (permanent, temporary, fixed-term, etc.)
- Work location and flexibility requirements
- Safeguarding and security requirements

2.2 Approval Process

All recruitment requires approval from:

- Line manager of the vacated or new role
- Senior management or departmental head

- Finance (budget approval)
- Data Protection Officer (for roles involving sensitive data access)
- Safeguarding lead (for roles involving vulnerable groups)

2.3 Role Specification

A detailed Job Description and Person Specification are prepared including:

Job Description:

- Job title and reporting line
- Key responsibilities and duties
- Context and environment of the role
- Key relationships and stakeholders
- Performance expectations
- Any travel or flexibility requirements

Person Specification:

- Essential qualifications and certifications
- Desirable qualifications and experience
- Knowledge and technical skills required
- Behavioural competencies
- Experience required (years and specific areas)
- Any professional memberships or registrations required
- Safeguarding and trustworthiness requirements
- Language requirements (if applicable)

3. Recruitment Planning and Advertising

3.1 Advertising Decisions

For each vacancy, RHS decides on the most appropriate recruitment method:

Internal Recruitment:

- Advertising the role to existing employees first
- Typically 1-2 weeks before external advertisement
- All applications considered on same basis as external candidates
- Provides career development opportunities for existing staff
- May be mandatory for certain roles

External Recruitment:

- Advertising through multiple channels to reach diverse candidate pools
- Includes online job boards, professional networks, social media, agencies
- Role description published on RHS website and recruitment platforms
- Explicit commitment to equal opportunities in advertisements

Hybrid Approach:

- Internal advertising followed by external advertising if no suitable internal candidates

Agency/Recruitment Consultant:

- Using recruitment agencies or consultants for specialist roles
- Agency agreement includes data protection terms and anti-discrimination commitments
- RHS retains responsibility for fair recruitment practices

3.2 Recruitment Channels

RHS advertises vacancies through:

- **Primary Channels:**
 - RHS website careers page
 - LinkedIn and professional networks
 - Universal Job Match (official UK government job board)
 - Indeed or other major job boards
- **Specialist Channels (where appropriate):**
 - Healthcare recruitment boards
 - Social care specific job sites
 - Professional association boards (nursing, healthcare professions)
 - LinkedIn specialist groups
- **Diversity Recruitment:**
 - Targeted outreach to underrepresented groups
 - Partnership with diversity organisations
 - Advertising in diverse media and platforms
 - Affinity group networks
- **Agency Recruitment:**
 - Specialist recruitment agencies (where beneficial)
 - Data Protection Agreements in place with all agencies
 - Clear instructions on non-discrimination

3.3 Recruitment Advertisement Content

All advertisements include:

Role Information:

- Job title and salary/remuneration
- Key responsibilities and main duties
- Role location and flexibility
- Contract type and duration (if applicable)
- Experience and qualifications required
- Reporting structure

Company Information:

- Brief description of RHS
- Company values and culture
- Commitment to equal opportunities
- Workplace benefits overview

Application Information:

- How to apply (link, email, recruitment system)
- Application deadline
- Expected timescale for interview stage
- Contact person for questions
- Commitment to diversity and inclusion

Equal Opportunities Statement:

- Explicit commitment to equal opportunities
 - Encouragement to underrepresented groups
 - Accessibility accommodations available
 - Non-discrimination commitment
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4. Application and Shortlisting Process

4.1 Application Procedures

Candidates apply through:

- Online application form (preferred method)
- Email submission (where online unavailable)
- Postal application (where reasonable adjustment required)
- Application through recruitment agency (if using agent)

Application materials typically include:

- Completed application form (RHS template)
- Curriculum Vitae (CV) or resume
- Cover letter (optional)
- Supporting statement addressing selection criteria
- Evidence of qualifications and certifications

4.2 Application Deadline and Process

- Application deadline clearly stated in advertisement
- All applications received by deadline accepted
- Late applications considered only at sole discretion of RHS
- Confirmation of application receipt provided to all candidates
- Applications kept confidential and secure

4.3 Shortlisting Criteria

Shortlisting decisions are based on:

Essential Criteria:

- Qualifications and certifications required for the role
- Essential experience and knowledge requirements
- Key competencies required
- Safeguarding and trustworthiness factors

Desirable Criteria:

- Additional relevant experience or training
- Professional development achievements
- Specialist skills or knowledge
- Evidence of professional commitment

Assessment Methods:

- Application form completion (quality and accuracy)
- Evidence of required qualifications (from submitted documents)
- Relevance of CV to role requirements
- Clarity and structure of application
- Evidence of commitment to role

4.4 Shortlisting Process

Shortlisting Panel:

- Minimum of two panel members (where possible)
- At least one panel member is the direct line manager
- One panel member is separate from the role area (for impartiality)
- HR representative may be included
- Data Protection Officer may be consulted on data-intensive roles

Shortlisting Decisions:

- Panel members independently assess each candidate against criteria
- Consensus discussion and agreement on shortlist
- Scores or ratings recorded for transparency
- Justification for each shortlisting decision documented
- Shortlist typically includes 4-8 candidates for interview
- All candidates notified of shortlisting outcome within 5 working days

Safeguarding During Shortlisting:

- Applications are assessed for red flags (gaps in employment, inconsistencies)
- Any concerns noted for discussion at interview
- Shortlisting assessment includes safeguarding considerations

4.5 Data Protection in Shortlisting

- Application data processed only for recruitment purposes
- Access restricted to shortlisting panel members
- Unsuccessful candidates' data retained for 3-6 months
- Unsuccessful candidates offered opportunity to update records for future opportunities
- GDPR rights (access, erasure, etc.) available to all candidates

5. Interview and Selection Process

5.1 Interview Formats

RHS uses various interview formats depending on role and circumstances:

Structured One-to-One Interview:

- Face-to-face or virtual interview
- Panel of 1-3 interviewers
- Standard questions asked to all candidates
- Consistent scoring and assessment

Panel Interview:

- Multiple interviewers conduct interview simultaneously
- Each interviewer assesses against different criteria
- Provides diverse perspective and reduces individual bias
- Typical for senior roles

Telephone/Virtual Interview:

- Used for initial screening (optional stage)

- Covers background, availability, and key motivations
- Can improve diversity by reducing unconscious bias
- Must ensure equal accessibility for all candidates

Practical Assessment/Skills Test:

- For certain roles (clinical positions, IT roles, etc.)
- Assesses practical ability and competence
- Applied consistently to all candidates in same role
- Assessed by qualified person in that skill area
- Results scored and recorded

Presentation or Task:

- Candidate presents on topic relevant to role
- Tests communication, organisation, and technical knowledge
- Equally applied to all candidates
- Assessment criteria clearly communicated

Group Assessment/Exercises:

- For senior or team-based roles
- Candidates interact with others during assessment
- Tests collaboration, communication, and problem-solving
- Reduces bias through observation of behaviour

5.2 Interview Panel Composition

Panel Membership Requirements:

- Minimum of one panel member is the direct line manager
- Minimum of one panel member from separate department/area (impartiality)
- Where possible, panel includes both men and women (diversity)
- No panel member should have personal relationship with candidate
- All panel members receive interview training

Specialist Panelists:

- Clinical roles: qualified healthcare professional
- Senior roles: senior management representative
- Safety-critical roles: health and safety representative
- Leadership roles: HR representative or senior leader

Panel Impartiality:

- Panel members declare any conflict of interest
- Individuals with conflict do not participate
- Panel members assess candidates objectively
- Personal preferences not permitted to influence decisions

5.3 Interview Questions and Assessment

Standard Questions:

- All candidates asked same core questions
- Questions based on job description and person specification
- Questions explore:
 - Relevant experience and achievements
 - Motivation for the role

- Understanding of RHS and healthcare sector
- Key competencies required
- Team working and communication
- Customer/patient focus
- Professional development commitment

Probing Questions:

- Follow-up questions clarify candidate responses
- Used to explore inconsistencies or gaps
- Ensure full understanding of experience
- Not used to discriminate or disadvantage

Questions NOT Asked:

- Questions about age or date of birth
- Questions about marital/partnership status
- Questions about children or family plans
- Questions about religion or beliefs (unless occupational requirement)
- Questions about sexual orientation (unless occupational requirement)
- Questions about disability (only about reasonable adjustments if disclosed)
- Questions about ethnic origin
- Questions about financial situation or personal circumstances (except as required for role)
- Questions about political views or activities
- Questions about trade union membership

Safeguarding-Specific Questions:

- Experience of safeguarding training and awareness
- Understanding of safeguarding responsibilities
- Approach to working with vulnerable persons
- Knowledge of relevant policies and procedures
- Experience handling confidential information

5.4 Candidate Assessment and Scoring

Assessment Criteria:

- Assessment based on job description and person specification
- Criteria communicated to panel before interviews
- Each criterion scored consistently across candidates
- Scoring method: typically 1-5 scale (1=poor, 5=excellent)

Assessment Areas:

- Relevant experience (0-15 points)
- Required qualifications/knowledge (0-15 points)
- Competencies (0-20 points)
- Communication and interpersonal skills (0-15 points)
- Motivation and commitment (0-10 points)
- Safeguarding awareness (0-10 points)
- Cultural fit and values alignment (0-10 points)

Assessment Record:

- Each interviewer records scores
- Comments justify each score
- Panel discussion follows interviews
- Final consensus score agreed

- Decisions documented for audit trail

5.5 Interview Process Standards

Candidate Treatment:

- Candidates informed of interview format in advance
- Clear instructions on timing, location, and what to bring
- Reasonable adjustments offered for accessibility needs
- Candidates notified of interview outcome within 5 working days
- Feedback offered to candidates (up to 3 suggestions per area)
- Professional and respectful treatment throughout

Accessibility Accommodations:

- Candidates can request reasonable adjustments
- Interview format adapted (e.g., written questions, longer duration)
- Accessible venue with parking and facilities
- Interview can be supported by companion or interpreter
- Quiet room provided for anxious candidates
- No cost to candidate for accommodations

Diversity Considerations:

- Panel composition reflects diversity
- Interview questions not culturally biased
- Candidates from underrepresented groups not subject to additional scrutiny
- Language accommodations provided if English not first language
- Religious observances accommodated (e.g., prayer breaks)

5.6 Feedback and Debrief

Interview Feedback:

- Offered to all shortlisted candidates (interviewed)
- Limited to 3-5 key areas
- Constructive and developmental in tone
- Not detailed score-by-score breakdown
- Typically provided by HR or line manager

Unsuccessful Candidate Feedback:

- Basic feedback: "Other candidates had more relevant experience"
- Suggestions for development: "Consider additional training in X"
- Encouragement to reapply: "We encourage future applications"
- Professional tone maintained

Unsuccessful Shortlisted Candidate Feedback:

- More detailed feedback: key strengths and areas for development
- Specific examples from interview
- Suggestions for professional development
- Encouragement regarding future opportunities
- Invitation to request further discussion

6. Background Checks and Vetting

6.1 DBS Checks (Disclosure and Barring Service)

Who Requires DBS Checks:

All candidates selected for appointment undergo DBS screening:

- Standard DBS Check: roles involving regular contact with children
- Enhanced DBS Check: roles with unsupervised access to children or vulnerable adults
- Enhanced with Barred List: senior safeguarding roles
- Positions with access to sensitive information or vulnerable persons
- All healthcare and social care roles
- Any role involving supervision or management
- Roles with access to clients' homes or personal information

DBS Scope:

- Criminal records check (England, Wales, Scotland, Northern Ireland)
- Children's and Adults' Barred Lists check
- Prohibited from teaching/working with children lists
- Local police records check
- Information from relevant organisations

DBS Process:

1. Selected candidate informed of DBS requirement
2. Candidate consents to DBS check in writing
3. RHS submits DBS application with candidate information
4. DBS processes application (typically 4-8 weeks)
5. Certificate issued directly to candidate
6. Candidate provides certificate to RHS
7. RHS verifies certificate details match personal information
8. Certificate stored securely
9. Candidate informed of any concerns/discrepancies identified

DBS Disclosure Discussion:

- If disclosure identified, candidate invited to discuss
- Candidate given opportunity to explain
- Assessment considers circumstances, seriousness, time elapsed
- Decision documented and communicated
- Candidate's right to appeal to DBS explained

DBS Confidentiality:

- Disclosure information kept strictly confidential
- Only disclosed to those with legitimate need-to-know
- Cannot be shared with other employees
- Not discussed publicly or in team meetings
- Stored separately from personnel file (where possible)
- Retained for duration of employment plus 6 months post-termination

6.2 Right to Work Verification

Legal Requirement:

All employees must have legal right to work in the UK:

- British or Irish citizens (automatic right)
- EU citizens (limited time following Brexit transition)

- Visa holders with work permission
- Points-based system participants with appropriate visa

Verification Process:

- Candidate provides original documentation as proof
- Copies taken and certified
- Documents verified against UKVI (UK Visas and Immigration) guidance
- Records maintained with employment file
- Compliance with Home Office requirements

Acceptable Documents:

- Passport showing right of abode
- Current visa with work permission
- Share code from UK Government digital right to work system
- National ID card (EU/EEA citizen with settled status)
- Birth certificate (UK/Irish citizen)

Expiry Dates:

- Visas with expiry dates require renewal checking
- Work permits with time limits require monitoring
- Calendar reminders set for verification renewal dates
- Employee informed when renewal required
- Contract may be terminated if right to work expires

6.3 Professional Registrations and Licenses

Verification Required:

For roles requiring professional registration:

- Nurses: Nursing and Midwifery Council (NMC) registration
- Doctors: General Medical Council (GMC) registration
- Allied Health Professionals: Health and Care Professions Council (HCPC)
- Healthcare Assistants: where required by employer
- Any role with professional body requirements

Verification Process:

1. Candidate provides professional registration details
2. RHS verifies registration with professional body (online or direct)
3. Confirmation that registration is active and in good standing
4. No conditions or sanctions on registration
5. Verification date and result recorded
6. Copy of verification stored with personnel file

Fitness to Practice:

- Registration checked for any fitness to practice concerns
- Professional body website consulted for sanctions register
- Any concerns discussed with candidate
- Recruitment decision made in light of professional history
- Reference to fitness to practice standards

6.4 Academic and Professional Qualifications

Verification Required:

For roles requiring specific qualifications:

- University degrees
- Professional diplomas or certifications
- Vocational qualifications
- Relevant training course completion
- Any role-specific qualifications

Verification Process:

1. Candidate provides qualification details and date
2. Educational institution contacted to verify
3. Degree/diploma name, classification, and date confirmed
4. Verification from awarding body obtained
5. Copies of original certificates obtained
6. Verification recorded and dated
7. Original certificates seen and copied

Grade/Classification Verification:

- If grade or classification required: verify specific level achieved
- Not assume level from candidate statement
- Direct contact with educational institution
- Original certificate inspected
- Any gaps in education explored at interview

6.5 Employment References

Reference Requirement:

Two employment references required (typically):

- Previous line manager (preferred)
- Senior colleague or manager familiar with performance
- Not family members or personal friends
- References from relevant period of employment history

Reference Request:

1. Candidate provides referee contact details
2. RHS writes directly to referees (not via candidate)
3. References requested before employment commencement
4. Referees asked about:
 - Performance and competence
 - Reliability and attendance
 - Interpersonal skills and team working
 - Reason for leaving role
 - Suitability for new position
 - Any safeguarding concerns
 - Any conduct issues or disciplinary proceedings

Reference Assessment:

- References assessed against role requirements
- Poor references investigated further
- Discrepancies explored with candidate
- Positive references support employment decision
- Confidentiality of references maintained

- References not shared with candidate without consent

Employment Gaps:

- Gaps in employment history explained
- References requested for gaps (career break explanation)
- Periods of unemployment or career change addressed
- Candidate explanation recorded

Reference on File:

- References kept on personnel file
- Treated confidentially
- Not shared with candidate (unless candidate requests)
- Retained for employment duration plus 6 months

6.6 Occupational Health Assessment

Occupational Health Requirement:

Selected candidates may be required to complete occupational health assessment:

- Physical demands of role assess fitness
- Absence history review (for candidates with disability/illness history)
- Health questionnaire completed
- Medical examination where appropriate
- Vaccination status verified (for health and social care roles)

Health Assessment Process:

1. Offer letter conditional on successful health assessment
2. Health questionnaire provided to candidate
3. Medical examination by occupational health provider
4. Assessment results provided to RHS
5. Fitness to perform role assessed
6. Reasonable adjustments identified if required
7. Candidate informed of outcome

Reasonable Adjustments:

- Where health issues identified, assess reasonable adjustments
- Occupational health provides adjustment recommendations
- Role may be modified to accommodate health needs
- Flexible working or additional support considered
- Candidate consulted on adjustments

Confidentiality of Health Information:

- Health assessment information kept confidential
- Stored separately from general personnel file
- Access limited to HR and line manager
- Medical information not disclosed to colleagues
- Retained for employment duration plus 6 months
- Subject to GDPR special category data protections

6.7 Social Media and Online Verification

Verification Approach:

RHS may conduct limited online verification:

- Verification of professional credentials (LinkedIn, professional websites)
- Confirmation of qualifications or experience stated
- Assessment of professional online presence
- Not intrusive investigation into personal life
- Only job-relevant information considered

Boundaries:

- Social media accounts not routinely searched
- Personal social media pages not reviewed
- Information from social media not used in selection
- No assessment of political views, beliefs, or lifestyle
- No review of private accounts
- No stalking or monitoring of candidates
- Professional verification limited to necessity

Data Protection:

- Candidate informed if online verification conducted
- Only publicly available information assessed
- Candidate consent obtained if accessing restricted information
- Information from verification not stored in personnel file
- Only hiring decision outcomes recorded

7. Job Offer and Acceptance

7.1 Offer Letter

Offer Communication:

Selected candidate receives offer letter including:

Key Terms:

- Job title and reporting structure
- Main duties and responsibilities
- Salary and remuneration
- Benefits package (holidays, pension, healthcare, etc.)
- Hours of work and flexibility
- Place of work and location
- Contract type (permanent, temporary, fixed-term)
- Notice period required
- Start date
- Any probationary period

Conditions:

- Offer conditional on receipt of references
- Offer conditional on successful DBS/background check
- Offer conditional on right to work verification
- Offer conditional on occupational health clearance
- Offer conditional on satisfactory references
- Any other conditions clearly stated

Timescale:

- Candidate given reasonable time to accept/decline (typically 5-7 working days)
- Start date aligned with notice period of current employment (if employed)
- Flexibility offered where possible
- Extensions considered for candidate circumstances

Verbal Offer:

- May be made informally by phone/email
- Candidate invited to confirm acceptance
- Formal written offer letter follows
- Acceptance of verbal offer not binding until written offer accepted

7.2 Offer Acceptance

Acceptance Method:

Candidate accepts offer by:

- Signed acceptance of offer letter
- Email confirmation of acceptance
- Return of signed employment contract
- Any other clear confirmation of acceptance

Conditional Acceptance:

- Candidate may accept subject to conditions
- Conditions negotiated (e.g., flexible working, start date)
- Agreed adjustments confirmed in writing

Offer Withdrawn:

- Offer withdrawn if conditions not met (DBS, references, health assessment)
- Candidate notified promptly if conditions not satisfied
- Reason for withdrawal clearly communicated
- Offer may be reconsidered if issues resolved

8. Data Protection in Recruitment

8.1 Personal Data Processing

Legal Basis:

Recruitment personal data processed under:

- **Contract:** Data necessary to enter employment contract
- **Legal Obligation:** Right to work verification, DBS checks, tax/NI compliance
- **Legitimate Interest:** Assessing suitability for role, safeguarding vulnerable persons
- **Consent:** Where explicitly obtained for specific processing (e.g., equal opportunities monitoring)

8.2 Data Collected

Application Data:

- Full name and contact details
- Qualifications and certification
- Employment history and experience

- Educational background
- Personal statement/cover letter
- Supporting information (skills, achievements)

Interview Data:

- Notes from interview discussions
- Assessment scores and ratings
- Practical assessment results
- Interview panel observations

Reference Data:

- Referee contact information
- Reference letter content
- Verbal reference notes

Background Check Data:

- DBS disclosure certificate details (restricted)
- Right to work verification documents
- Professional registration details
- Qualification certificates
- Occupational health information

Equality Monitoring Data:

- Age, gender, ethnic origin (optional, candidate provided)
- Disability status (optional, candidate provided)
- Sexual orientation (optional, candidate provided)
- Religion/belief (optional, candidate provided)
- Used for diversity monitoring only (anonymised for analysis)

8.3 Data Retention

Successful Candidate Data:

- Application data retained on personnel file
- Interview notes and assessment scores retained (6-7 years)
- References retained on personnel file
- DBS disclosure information (DBS regulations apply)
- Right to work verification retained throughout employment plus 2 years
- Professional registration copies retained
- Qualification verification retained
- Occupational health information (6 years post-termination, confidentially)

Unsuccessful Candidate Data:

- Application data retained: 3-6 months after recruitment completion
- Interview notes: 3-6 months (unless candidate requests deletion)
- References: 3-6 months
- Assessment scores: 3-6 months
- Unsuccessful candidates offered option to keep data (for future opportunities)
- Data deleted securely after retention period unless candidate opts in to future opportunities

8.4 Data Security

Technical and Organisational Measures:

- Application data encrypted in transit and at rest
- Access to recruitment data restricted to recruitment team
- Recruitment system password protected and access controlled
- Paper application forms stored securely
- DBS information stored separately from main file
- Health information stored separately
- Regular security updates and vulnerability patches
- Backup procedures in place
- Incident response procedures in place

8.5 Data Subject Rights

Candidate Rights:

- Right to Access: Candidate can request copy of data held
- Right to Rectification: Incorrect data corrected
- Right to Erasure: Data deleted after retention period or on request
- Right to Restrict Processing: Processing suspended on request
- Right to Data Portability: Data provided in portable format
- Right to Object: Processing objection considered
- Right to Not be Subject to Automated Decision-Making: Decisions not automated

Exercising Rights:

Candidates can exercise rights by writing to:

- Data Protection Officer
- HR department
- Via recruitment system portal (where available)

Response Timescale:

- Requests responded to within 30 days
- Extensions possible for complex requests (up to 90 days)
- Reasons for any refusal explained

8.6 Privacy Notice

All candidates receive Privacy Notice including:

- What data is collected
- Why data is collected
- Who data is shared with
- How long data retained
- What rights candidates have
- How to exercise rights
- How to complain

Privacy notice provided:

- In job advertisement
- With application form
- In offer letter
- On recruitment website

9. Fair Recruitment Practices

9.1 Equality and Diversity

Equality Commitment:

RHS commits to non-discriminatory recruitment:

- No discrimination based on protected characteristics
- Equal opportunity for all candidates
- Diverse selection panels
- Multiple recruitment methods to reach diverse candidates
- Targeted outreach to underrepresented groups
- Accessible recruitment process

Protected Characteristics:

The Equality Act 2010 protects against discrimination based on:

- Age (direct and indirect)
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race (including colour, nationality, ethnic/national origin)
- Religion or belief
- Sex
- Sexual orientation

Discrimination Prohibited:

No discrimination in:

- Recruitment advertising
- Shortlisting decisions
- Interview conduct or questions
- Selection decisions
- Offers of employment
- Application of recruitment procedures

Positive Action:

RHS may take positive action to:

- Encourage applications from underrepresented groups
- Provide additional support (e.g., interview coaching)
- Target recruitment advertising to underrepresented communities
- Offer mentoring or development opportunities

9.2 Accessibility and Reasonable Adjustments

Accessibility Statement:

All recruitment materials include statement:

"We are committed to making our recruitment process accessible to everyone. If you need any reasonable adjustments to participate in the recruitment process, please contact us immediately."

Reasonable Adjustments Offered:

- Interview format changes (telephone, virtual, written questions)
- Additional time for application or interview
- Large print or audio format of materials
- Quiet room without interruptions
- Support from companion or interpreter
- Breaks during assessment
- Accessible venue with parking and facilities
- Flexible interview timing for health reasons
- Any other adjustment to facilitate participation

Adjustments Provided:

- At no cost to candidate
- Without prejudice to selection decision
- Assessed for practicality and necessity
- Arranged promptly once requested

Disclosure of Disability:

- Candidates not required to disclose disability
- Disclosure voluntary and used only for adjustment purposes
- Disability disclosed not used in selection decision
- Information treated confidentially

9.3 Unconscious Bias Reduction

Bias Recognition:

RHS recognises unconscious bias and implements measures to reduce:

- **Affinity Bias:** Preference for candidates similar to interviewer
- **Name Bias:** Discrimination based on candidate name/ethnicity
- **Halo Effect:** Overvaluing one positive characteristic
- **Confirmation Bias:** Only noting information confirming initial impression
- **Anchoring Bias:** Over-reliance on first impression
- **Gender Bias:** Assumptions about roles based on gender

Bias Mitigation:

- Structured interview questions (same for all candidates)
- Diverse recruitment panels
- Anonymous shortlisting (removing names/demographics where possible)
- Scoring criteria established before interviews
- Training for recruitment panel on unconscious bias
- Structured assessment tools used
- Panel diversity in gender, ethnicity, age where possible

Monitoring and Improvement:

- Diversity of applicants and successful candidates monitored
- Analysis of selection outcomes by protected characteristic
- Investigation of any patterns suggesting bias
- Training and process updates where bias identified
- Regular review of recruitment metrics

9.4 Safeguarding and Vetting

Safeguarding Commitment:

RHS is committed to safeguarding vulnerable persons:

- All staff (employees, contractors, volunteers) vetted appropriately
- No person unsuitable for safeguarding reasons employed
- Robust background checks and references
- DBS disclosure reviewed carefully
- Professional fitness to practice verified
- Safeguarding training provided

Red Flags Assessment:

Recruitment identifies and investigates:

- Criminal convictions relevant to safeguarding
- Fitness to practice concerns
- Professional misconduct history
- Concerns in references regarding safeguarding
- Gaps in employment history (for safeguarding roles)
- False information provided in application
- Connections to individuals with safeguarding concerns
- Previous safeguarding complaints or investigations

Safeguarding Interview Questions:

- Experience with safeguarding in previous roles
- Training and understanding of safeguarding
- Approach to working with vulnerable persons
- Experience handling confidential information
- References to safeguarding practices
- Understanding of professional boundaries

Safeguarding Decision-Making:

- Concerns about safeguarding trigger careful consideration
- Candidate given opportunity to explain concerns
- Professional judgment applied to risk assessment
- Decision documented with clear reasoning
- Erring on side of caution where safety at risk
- No employment where safeguarding risk identified

10. Offer Withdrawal and Rejection

10.1 Reasons for Offer Withdrawal

Offer may be withdrawn if:

- Candidate fails background/DBS check
- Safeguarding concerns identified that preclude employment
- Right to work cannot be verified
- Professional registration cancelled or suspended
- Qualifications cannot be verified
- Fitness to practice concerns identified
- References inadequate or raise serious concerns
- Candidate provides false information
- Occupational health assessment shows inability to perform role
- Candidate declines agreed reasonable adjustments essential for role

10.2 Withdrawal Process

If offer withdrawn:

1. Candidate informed promptly
2. Reason explained (where appropriate to disclose)
3. Candidate given opportunity to respond (where applicable)
4. Offer withdrawal confirmed in writing
5. Candidate informed of any appeal process
6. Data retention explained
7. Professional and fair tone maintained

10.3 Unsuccessful Candidate Rejection

Rejection Timing:

- Rejected candidates informed promptly
- Within 5 working days of final decision
- Before information shared with unsuccessful candidates
- Via email or phone (as candidate prefers)

Rejection Communication:

- Professional and respectful tone
- Brief reason provided (where possible)
- Feedback offer made
- Encouragement to apply for future roles
- Thank you for engagement

11. Onboarding and Pre-Employment

11.1 Pre-Employment Checks Completion

Before Start Date:

- DBS check returned and verified
- Right to work verification completed
- References received and assessed
- Occupational health clearance received
- All conditions of offer satisfied
- Background checks completed
- Start date confirmed

Final Confirmation:

- Final written confirmation sent to candidate
- Start date, time, location, and reporting person confirmed
- Pre-employment documents to complete (contract, tax form, etc.)
- Equipment/access requirements arranged
- Induction schedule provided
- Any other pre-start information provided

11.2 Contract of Employment

Contract Provision:

Candidate provided with:

- Written contract of employment
- Specific terms including:
 - Job title and duties
 - Reporting structure
 - Remuneration and benefits
 - Hours of work and flexibility
 - Probationary period (if applicable)
 - Notice period
 - Disciplinary and grievance procedures
 - Confidentiality and data protection obligations
 - Safeguarding commitments
 - Health and safety obligations
 - Equal opportunities statement
 - References to relevant policies

Contract Signature:

- Contract provided at least 7 days before start date
- Candidate has opportunity to review
- Candidate signs and returns before start date
- Copy retained for both parties

11.3 Induction Programme

Induction Objectives:

- Welcome and orientation to company
- Policies and procedures overview
- Role-specific training
- Health and safety training
- Safeguarding and data protection training
- Confidentiality obligations reinforced
- Systems and IT training
- Team introductions and social integration
- Assignment of mentor/buddy where appropriate

Induction Schedule:

- Day 1: Welcome, facilities tour, IT setup, basic procedures
- Week 1: Policies, health and safety, safeguarding basics
- Week 2: Role-specific training, team meetings, buddy introduction
- Month 1: One-to-one check-ins, progress review
- Month 3: Formal probation review

11.4 Probation Period

Probation Process:

- Typical probation period: 3-6 months
- Probation period specified in contract
- Regular check-ins throughout probation (at least monthly)
- Mid-probation review at 6-8 weeks
- Final probation review at end of period

Probation Assessment:

- Performance against role requirements
- Completion of mandatory training

- Integration with team
- Adherence to policies and procedures
- Safeguarding and confidentiality compliance
- Professional conduct and behaviour

Probation Outcomes:

- Confirmation of employment (successful probation)
- Extension of probation (with clear expectations)
- Termination of employment (not meeting requirements)

12. Recruitment of Vulnerable Groups

12.1 Recruitment of Ex-Offenders

Rehabilitation of Offenders Act 1974 Considerations:

For roles involving safeguarding or sensitive work:

- Disclosure of relevant spent convictions required
- Only convictions relevant to role considered
- Time since conviction assessed
- Circumstances of conviction considered
- Other evidence of rehabilitation assessed
- Professional judgment applied in context
- Candidate given fair opportunity to respond

Relevant Convictions Assessment:

- Crimes against children: always relevant
- Crimes against vulnerable adults: always relevant
- Violence or abuse: likely relevant
- Dishonesty (fraud, theft): may be relevant depending on role
- Driving offences: relevant for driving roles
- Time elapsed since conviction: rehabilitation considered

Fair Treatment:

- No blanket bans on employment
- Each case assessed individually
- Presumption of rehabilitation after appropriate time
- Candidate given opportunity to explain
- Professional judgment applied fairly

12.2 Recruitment of Young Workers

Young Worker Safeguarding:

- Recruitment of workers under 18 subject to additional safeguards
- Health and safety risk assessment for young workers
- Supervisor assigned to young worker
- Additional training and support provided
- Restrictions on working hours and shifts
- Compliance with National Minimum Wage
- Risk of exploitation assessed
- Safeguarding concerns flagged

Young Worker Recruitment Process:

- Parental consent obtained where required
 - Specific terms for young worker role
 - Enhanced supervision and support
 - Health and safety induction specific to young workers
 - Restriction on certain duties or areas
 - Regular well-being check-ins
-

13. Recruitment Complaints and Appeals

13.1 Recruitment Complaints

Complaint Procedure:

Candidates may complain about recruitment process:

- Discrimination or unfair treatment
- Breach of recruitment procedures
- Lack of accessibility accommodations
- Data protection breaches
- Confidentiality breaches
- Other procedural concerns

Complaint Process:

1. Candidate submits written complaint to HR/DPO
2. Acknowledgment within 5 working days
3. Investigation conducted (typically 10 working days)
4. Investigation outcome provided
5. Remedial action taken if complaint upheld
6. Candidate offered appeal if dissatisfied

Appeal Process:

- Written appeal within 10 working days of decision
- Reviewed by manager independent of original decision-maker
- Appeal decision provided within 10 working days
- Final appeal outcome (no further appeal)

13.2 Appeals of Recruitment Decisions

Grounds for Appeal:

- Breach of recruitment procedures
- Discrimination in selection process
- Bias or unfair assessment
- Failure to provide reasonable adjustments
- Procedural unfairness
- Misapplication of selection criteria

Appeals Process:

- Candidate initiates appeal within 10 working days of rejection
 - Appeal request with grounds submitted to HR
 - Appeal reviewed by separate manager/panel
 - Appeal decision within 15 working days
 - Outcome communicated in writing
-

14. Recruitment Monitoring and Evaluation

14.1 Diversity Monitoring

Monitoring Data Collected:

For equal opportunities monitoring (optional, voluntary):

- Age
- Gender
- Ethnic origin
- Disability status
- Sexual orientation
- Religion/belief

Data Protection:

- Candidate informed of monitoring
- Data collection voluntary
- Data anonymised for analysis
- Not used in selection decision
- Stored separately from application
- Compliance with GDPR special category data rules

Monitoring Analysis:

- Applicant diversity statistics analysed
- Shortlist diversity compared to applicant pool
- Successful candidate diversity analysed
- Any patterns suggesting bias investigated
- Action taken to improve diversity if needed
- Annual diversity report produced

14.2 Recruitment Metrics

Metrics Tracked:

- Number of applications received
- Application sources and channels
- Shortlist rate
- Interview rate
- Offer rate
- Acceptance rate
- Time to hire
- Cost per hire
- Diversity metrics (as above)
- Candidate satisfaction with process

Performance Analysis:

- Recruitment efficiency assessed
- Best sources of candidates identified
- Improvement opportunities identified
- Diversity trends monitored
- Process effectiveness evaluated

14.3 Recruitment Reviews

Regular Reviews:

- Monthly: Key recruitment metrics reviewed
- Quarterly: Process effectiveness assessed
- Annually: Comprehensive recruitment audit
- On-demand: Following specific issue or concern

Review Focus:

- Compliance with procedures
 - Fair and non-discriminatory practice
 - Diversity and inclusion effectiveness
 - Data protection compliance
 - Feedback from candidates and hiring managers
 - Areas for improvement
-

15. Recruitment Staffing and Training

15.1 Recruitment Panel Training

Training Required:

All recruitment panel members receive training on:

- Recruitment procedures and standards
- Structured interviewing techniques
- Unconscious bias and diversity
- Equality and discrimination law
- Safeguarding and risk assessment
- Data protection and confidentiality
- Reasonable adjustments and accessibility
- Professional interviewing conduct
- Note-taking and documentation
- Question design and consistency

Training Record:

- Training attendance recorded
- Training content documented
- Competency assessed
- Refresher training provided annually
- New panel members trained before first involvement

15.2 HR and Recruitment Staff

Recruitment Officer Responsibilities:

- Manage recruitment process end-to-end
- Advertise vacancies appropriately
- Manage applications and shortlisting
- Coordinate interviews and assessments
- Conduct background checks
- Manage offer and onboarding
- Maintain data protection and confidentiality
- Support recruitment panels

- Maintain audit trail of decisions

HR Manager Responsibilities:

- Approve recruitment strategy
- Oversee recruitment process
- Ensure compliance with procedures
- Handle complaints and appeals
- Conduct diversity monitoring
- Review recruitment metrics
- Provide feedback to hiring managers
- Update and improve processes

Data Protection Officer Involvement:

- Reviews high-risk recruitment (safeguarding roles)
 - Advises on data protection compliance
 - Reviews recruitment procedures
 - Handles data protection complaints
 - Conducts recruitment data audits
-

16. Recruitment Policies and Procedures

16.1 Advertising and Job Description Standards

Minimum Content Required:

- Job title
- Main responsibilities
- Required experience and qualifications
- Salary or salary range
- Contract type and hours
- Location
- Application deadline
- Equal opportunities statement
- Accessibility commitment

Inclusive Language:

- Gender-neutral language used
- Inclusive of diverse backgrounds
- No unnecessary experience demands
- Requirements justified and relevant
- Encouragement to diverse groups

16.2 Application Form Standards

Required Fields:

- Personal information (name, contact details)
- Employment history
- Educational background
- Qualifications
- Relevant experience
- Supporting statement
- Optional equal opportunities questions
- Consent for background checks
- Confirmation of accuracy

Form Design:

- Clear and user-friendly
- Accessibility compliant (online form)
- Reasonable time estimate for completion
- Not excessively burdensome
- Questions relevant to role
- No discriminatory questions

16.3 Interview Standards

Interview Preparation:

- Questions prepared and shared with panel
- Assessment criteria established
- Scoring framework agreed
- Room setup to be accessible and comfortable
- Interview length reasonable (typically 30-60 minutes)
- Break provided if needed (long interview)

Interview Conduct:

- Interviewer professional and respectful
 - Candidate treated fairly and consistently
 - Questions asked in same order to all candidates
 - Candidate given opportunity to ask questions
 - No rush or time pressure
 - Confidentiality explained
 - Next steps explained
-

17. Specific Recruitment Scenarios

17.1 Recruitment of Healthcare Professionals

Additional Requirements:

- Registration with professional body verified
- Professional indemnity insurance confirmed
- CPD (Continuing Professional Development) evidence
- Fitness to practice assessed
- Professional references from clinical contacts
- Clinical competency assessment (may be required)
- Health and safety knowledge verified

Safeguarding Assessment:

- Safeguarding questions included
- Professional conduct history assessed
- Any fitness to practice concerns identified
- Professional boundaries understanding verified
- Patient confidentiality commitment confirmed

17.2 Recruitment of Senior Managers

Senior Manager Recruitment:

- More extensive background checking
- Multiple levels of interviews (initial, panel, final)
- Stakeholder consultation (team, board)
- Leadership competencies assessed
- Strategic alignment verified
- External references from previous senior roles
- Probation period typically 6 months
- Board approval may be required

17.3 Recruitment of Volunteers

Volunteer Recruitment:

- Similar safeguarding checks as employees (where working with vulnerable groups)
- DBS check required if unsupervised access to vulnerable persons
- Volunteer agreement signed (not employment contract)
- Role clarity and expectations defined
- Training and support provided
- Confidentiality agreement signed
- Volunteer liability insurance arranged
- Supervision and support structure in place

17.4 Recruitment of Agency/Temporary Workers

Agency Worker Recruitment:

- Agency agreement includes recruitment standards compliance
- DBS checks and background verification required
- Right to work verification mandatory
- Professional registration verified if required
- References obtained
- Contract terms specify confidentiality and safeguarding
- Induction provided (basics at minimum)
- Supervision and support in place
- Equal treatment with permanent staff

18. Recruitment Timeline and Standards

18.1 Recruitment Timeline

Typical Recruitment Schedule:

Stage	Timeline
Approval to recruit	Day 1
Advert posted	Days 1-2
Advert live	Weeks 1-2 (typically 2-3 weeks)
Application deadline	Week 2-3
Shortlisting	Days 1-5 post-deadline
Interview invitations	Days 2-3 post-deadline
Candidates to accept/decline	3-5 working days
Interview dates	Weeks 2-3 post-deadline

Interview outcomes	Within 5 working days
Offer letter	Immediately upon decision
Offer acceptance deadline	5-7 working days
Background checks commence	Day 1 after acceptance
Background checks completion	Weeks 2-4 (DBS typically 4-8 weeks)
Start date	Weeks 4-6 post-offer (depends on notice period)

Timeline Flexibility:

- Timeline adjusted for individual circumstances
- Longer timescale for complex recruitment
- Shorter timescale for urgent recruitment (documented)
- Reasonable accommodation for candidate circumstances
- Notice period of current employer considered

18.2 Recruitment Standards Summary

RHS recruitment meets the following standards:

Fairness:

- Consistent application of procedures to all candidates
- Objective assessment criteria
- Fair consideration of all applications
- No discrimination or bias
- Clear communication throughout

Transparency:

- Role requirements clearly communicated
- Selection criteria published
- Process timeline clear
- Candidates informed of outcomes promptly
- Feedback offered to candidates

Efficiency:

- Recruitment completed in reasonable timeframe
- No unnecessary delays
- Responsive communication with candidates
- Regular progress updates
- Timely decision-making

Inclusivity:

- Diverse candidate pools reached
- Accessibility accommodations offered
- Welcoming environment for all
- No barriers to diverse applicants
- Targeted outreach to underrepresented groups

Compliance:

- All legal requirements met (employment law, GDPR, safeguarding)
 - Procedures followed consistently
 - Data protection maintained
 - Safeguarding checks completed
 - Audit trail documented
-

19. Recruitment Complaints and Concerns

19.1 Discrimination Complaints

Complaint Categories:

Candidates may complain of:

- Age discrimination
- Disability discrimination
- Gender reassignment discrimination
- Marriage/civil partnership discrimination
- Pregnancy/maternity discrimination
- Race discrimination
- Religion/belief discrimination
- Sex discrimination
- Sexual orientation discrimination
- Any other form of discrimination

Complaint Process:

1. Candidate writes to HR with complaint details
2. HR acknowledges complaint within 5 working days
3. Investigation conducted by independent investigator
4. Candidate interviewed regarding complaint
5. Recruitment panel interviewed
6. Evidence reviewed
7. Investigation report produced
8. Outcome communicated to candidate
9. Remedial action taken if discrimination found
10. Appeal process available if candidate dissatisfied

19.2 Data Protection Complaints

Complaint Subjects:

- Unauthorized processing of personal data
- Failure to provide privacy notice
- Data breach (unauthorized access or disclosure)
- Lack of data security
- Refused data subject request
- Retention of data beyond retention period
- Other data protection concerns

Complaint Process:

- Submitted to Data Protection Officer
- Acknowledged within 5 working days
- Investigation conducted
- GDPR compliance assessed
- Outcome communicated
- Remedial action taken
- Appeal to ICO available

20. Procurement of Recruitment Services

20.1 Recruitment Agency Agreements

Requirements for Recruitment Agencies:

- Data Processing Agreement in place
- Commitment to equal opportunities
- Commitment to non-discrimination
- Compliance with employment law
- Safeguarding practices compliance
- Confidentiality obligations
- Right to work verification responsibility
- Background check management
- Feedback and communication standards

Agency Performance Standards:

- Candidate quality and fit assessment
- Response time to candidate inquiries
- Professional conduct
- Compliance with RHS recruitment procedures
- Data protection compliance
- Diversity of candidates sourced

Agency Monitoring:

- Regular performance reviews
- Candidate feedback requested
- Compliance with procedures verified
- Data protection compliance checked
- Quality of candidates assessed
- Termination if standards not met

20.2 Recruitment Systems

Recruitment System Requirements:

- Secure data storage (encryption)
- Access controls and authentication
- Audit trail of actions
- Shortlisting and scoring functionality
- Interview scheduling
- Offer letter generation
- Communication with candidates
- GDPR compliance
- Data retention management
- Regular security updates

21. Policy Governance and Review

21.1 Policy Owner

HR Manager/Director: Responsible for policy maintenance, updates, and enforcement

21.2 Review Schedule

This Policy is reviewed:

- Annually as standard
- Immediately upon legislative change
- Upon significant organizational change
- Upon recruitment complaint or concern
- Upon external audit or regulator guidance
- At least every 24 months regardless of circumstances

21.3 Version Control

Policy updates tracked and documented:

- Version number and date recorded
- Changes identified and communicated
- Previous versions archived (minimum 3 years)
- Staff notified of material changes
- Training updated accordingly

21.4 Approval

Policy approved by:

- HR Manager/Director
- Senior Management
- Data Protection Officer
- Board (if governance body)

21.5 Communication

Policy communicated to:

- All hiring managers
- All recruitment staff
- All interview panel members
- Job candidates (summary)
- All employees (upon hire)
- Recruitment agencies and partners

22. Key Recruitment Principles Summary

Core Principles

Fairness:

All candidates treated equally and fairly, with consistent application of procedures and transparent decision-making.

Transparency:

Clear communication about role requirements, selection process, timescales, and outcomes to all candidates.

Non-Discrimination:

No discrimination based on protected characteristics; compliance with Equality Act 2010.

Merit-Based:

Selection decisions based solely on job-related criteria and candidate suitability for the role.

Data Protection:

All personal data processed securely, fairly, and in compliance with UK GDPR and Data Protection Act 2018.

Safeguarding:

Appropriate checks and vetting to protect vulnerable persons and maintain service quality.

Accessibility:

Recruitment process accessible to all candidates; reasonable adjustments offered without hesitation.

Professional Conduct:

All recruitment staff act professionally, respectfully, and with integrity throughout the process.

23. Appendices and Supporting Documents

The following documents support this policy:

- Job Description Template
- Person Specification Template
- Recruitment Advertisement Template
- Application Form Template
- Shortlisting Assessment Form
- Interview Question Bank
- Interview Scoring Sheet
- Offer Letter Template
- Employment Contract Template
- Recruitment Complaint Form
- Data Subject Request Form
- DBS Disclosure Discussion Guidance
- Unconscious Bias Training Materials
- Recruitment Procedure Checklist
- Privacy Notice for Candidates

24. Document Control

- **Issue Date:** June 2025
- **Next Review:** June 2026
- **Classification:** Internal - Confidential
- **Document Owner:** HR Manager/Director

Approval Signatures:

- **HR Manager/Director:** _____ | Date: _____
- **Data Protection Officer:** Mazher Khan | Date: 02/June/2025
- **Operations Officer:** Falaknaz Khan and Sean Carter | Date: 02/June/2025

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