

RECRUITMENT POLICY AND PROCEDURE



PRIMUS PLUS HEALTHCARE

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1. PURPOSE

The purpose of this Recruitment Policy and Procedure for Primus PLUS Healthcare is to establish a clear and structured framework for the recruitment of staff in our supported living services without personal care for adults with learning disabilities, mental health needs, and autism spectrum conditions (ASC). This policy ensures that all recruitment practices are fair, transparent, inclusive, and fully compliant with the legal obligations set forth by the Care Quality Commission (CQC), UK legislation, and relevant national bodies.

The policy outlines the processes and standards that govern how we recruit, select, and employ staff to ensure that individuals appointed are fit and proper persons as required by Regulation 19 of the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014, as well as other relevant regulations. It also supports the CQC's requirements for safe recruitment, safeguarding of vulnerable adults, and compliance with employment standards.

Primus PLUS Healthcare is committed to providing high-quality, person-centred care in a safe and supportive environment for service users with complex needs, including learning disabilities, mental health conditions, and autism spectrum conditions. As part of this commitment, we aim to recruit individuals who have the right qualifications, experience, and values to meet the specific needs of our service users, while adhering to the highest standards of recruitment practice.

This policy will ensure that our recruitment procedures:

1. Comply with all legal requirements under UK law, including:
 - The Care Act 2014.
 - The Equality Act 2010.
 - The Data Protection Act 2018 and UK GDPR for safeguarding data.
 - Safeguarding Vulnerable Groups Act 2006, ensuring a safer environment for vulnerable adults.
 - The Autism Act 2009 and the Mental Health Act 1983 (amended), ensuring the recruitment of staff with an understanding of autism and mental health issues.
2. Ensure fairness and inclusivity in the recruitment process, offering equal opportunities to all candidates, regardless of race, gender, age, disability, sexual orientation, or other protected characteristics under the Equality Act 2010.
3. Maintain compliance with Regulation 19: Fit and Proper Persons under the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014, by ensuring that only suitable and qualified individuals are appointed to roles within supported living services.
4. Uphold our safeguarding commitments by conducting robust DBS checks, referencing, and background checks for all candidates to ensure the safety and well-being of our service users.
5. Provide clarity on recruitment practices for roles such as full-time staff, volunteers, apprentices, and overseas workers (if applicable), ensuring that each step of the recruitment process meets the relevant legal and regulatory requirements.
6. Ensure accessibility and inclusion in our recruitment process, particularly for people with autism and learning disabilities, by making adjustments where necessary to accommodate

candidates with special needs and ensuring that the recruitment process is accessible to everyone.

7. Demonstrate our commitment to transparency and accountability by outlining the recruitment complaints procedure, giving all applicants the ability to raise concerns or complaints regarding the recruitment process.

By implementing this policy, Primus PLUS Healthcare aims to attract, recruit, and retain high-quality staff who will deliver the best care to our service users, with a focus on person-centred care that respects the dignity, rights, and preferences of individuals with complex care needs.

Key Elements in the Policy to Align with CQC and Legal Requirements:

1. Fairness and Compliance with Legislation: The policy ensures that all recruitment practices comply with relevant legislation, including CQC regulations, the Equality Act 2010, Data Protection Act 2018, and the Care Act 2014, ensuring fair and legal treatment of all candidates.
2. Stages of Recruitment: The policy outlines clear procedures for each stage of the recruitment process, from advertising the vacancy, application, and shortlisting, to interview, checking identity, taking up references, DBS checks, and offering a post.
3. Recruitment of Volunteers and Apprentices: If applicable, the policy includes a clear approach to recruiting volunteers and apprentices, outlining how they are assessed, trained, and monitored to ensure they meet the same standards of care and safeguarding required for full-time staff.
4. Overseas Workers: For international recruitment, the policy addresses the checks required for overseas workers, including right to work checks, verification of qualifications, and any additional safeguarding checks as necessary.
5. References and Employment History: The policy specifies what references are required for new employees, particularly those who have worked in health or social care or with vulnerable adults, and how previous employment history will be verified.
6. Safeguarding and Monitoring: Clear safeguards are in place, ensuring that all staff working with vulnerable adults are subject to stringent background checks, including DBS checks, and that safeguarding standards are upheld throughout the recruitment and employment process.
7. Equality, Diversity, and Accessibility: The policy commits to ensuring that recruitment is inclusive and accessible for all individuals, including those with learning disabilities and autism, in line with CQC and Equality Act 2010 requirements.
8. Data Protection: Ensures compliance with UK GDPR and the Data Protection Act 2018 regarding the handling of candidate data, ensuring that personal data is processed lawfully, fairly, and transparently.

2. SCOPE

This Recruitment Policy and Procedure applies to all recruitment activities undertaken by Primus PLUS Healthcare for the provision of supported living services without personal care to adults with learning disabilities, mental health needs, and autism spectrum conditions (ASC). The policy covers the recruitment of staff, volunteers, apprentices, and overseas workers to ensure that all personnel

hired to provide care and support meet the highest standards of competency, safeguarding, and legal compliance. It outlines how we will recruit, train, and monitor staff to ensure that they are appropriately qualified and fit to work with vulnerable adults, in line with CQC regulations and relevant UK legislation.

This policy applies to all roles within Primus PLUS Healthcare, including but not limited to:

- Full-time staff: Permanent employees who are responsible for the daily care and support of service users in supported living environments.
- Temporary and agency staff: Those employed on a short-term basis to meet service demands or cover absences, ensuring they adhere to the same recruitment standards.
- Volunteers and apprentices: Individuals who may work with service users under supervision, ensuring they receive appropriate training and background checks before being allowed to interact with vulnerable adults.
- Overseas workers: Staff who are recruited from outside the UK, ensuring all legal requirements for immigration, employment rights, and safeguarding are adhered to.

The scope of this policy includes all stages of recruitment, from identifying a vacancy to the offer of employment, and details the requirements and actions at each stage to meet the following:

1. Compliance with Regulation 19: Fit and Proper Persons Employed under the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014, ensuring that only individuals who are suitable to work with vulnerable adults are hired.
2. Adherence to relevant legislation and standards, including:
 - The Equality Act 2010, which ensures non-discriminatory recruitment practices.
 - The Data Protection Act 2018 and UK GDPR, ensuring the lawful processing, storage, and handling of candidate information.
 - The Safeguarding Vulnerable Groups Act 2006, which includes the DBS check requirement for those working with vulnerable groups.
 - The Autism Act 2009 and Mental Health Act 1983, ensuring that recruitment considers the specific needs of service users with autism and mental health conditions.
3. Transparency and fairness throughout the recruitment process, ensuring all candidates are treated equitably and that recruitment procedures are clear, consistent, and accessible.
4. Inclusivity and accessibility in the recruitment process, ensuring candidates with learning disabilities, mental health needs, and autism can access and use the recruitment policy, with reasonable adjustments made where necessary to support applicants with additional needs.
5. Safeguarding standards that include thorough background checks, including DBS checks, verifying employment history, confirming the suitability of references, and ensuring that all potential employees are fit to work with vulnerable adults.
6. Monitoring and review of the recruitment process to ensure it aligns with current CQC standards, best practice guidelines, and relevant legislative changes.
7. Employment of volunteers, apprentices, and overseas workers in a way that complies with both UK immigration law and the CQC safeguarding standards. This policy will outline how Primus

PLUS Healthcare ensures that volunteers, apprentices, and overseas workers are subject to the same thorough checks and training as full-time employees.

Scope Includes:

- Recruitment of permanent, temporary, and agency staff to work with vulnerable adults.
- Recruitment of volunteers and apprentices, ensuring they meet the required standards for safeguarding and competence.
- Recruitment of overseas workers, including the verification of qualifications and right to work in the UK, along with the appropriate checks in line with UK immigration law.
- Adherence to relevant national guidelines, including those issued by Skills for Care, CQC, and the National Autistic Society for recruiting staff to work with people with autism and other learning disabilities.
- Compliance with all relevant safeguarding and employment regulations, including CQC guidelines, the Equality Act 2010, and other relevant legislative and regulatory frameworks.
- Review of recruitment practices to ensure continuous improvement and compliance with the latest legal and regulatory standards.

3. POLICY STATEMENT

Primus PLUS Healthcare is committed to ensuring that our recruitment practices uphold the highest standards of fairness, inclusivity, and compliance with all relevant legislation and regulatory frameworks. This Recruitment Policy and Procedure is designed to ensure that we attract, recruit, and employ individuals who are fully capable of providing high-quality, person-centred care to adults with learning disabilities, mental health needs, and autism spectrum conditions (ASC) in our supported living services without personal care.

Our approach to recruitment is built on a foundation of equality, diversity, and safeguarding, ensuring that all candidates are treated with respect and that the process is transparent and equitable. The policy aligns with CQC regulations and is fully compliant with the Health and Social Care Act 2008, specifically Regulation 19: Fit and Proper Persons Employed, and other relevant UK legislation, including the Equality Act 2010, the Data Protection Act 2018, and UK GDPR.

Primus PLUS Healthcare ensures that every stage of the recruitment process—from advertising vacancies to offering posts—adheres to a structured procedure that prioritizes safeguarding, checks qualifications and experience, and ensures the candidate is “fit and proper” to provide care for vulnerable individuals.

We recognize the diverse needs of our service users, and as such, we are committed to recruiting staff who possess not only the relevant professional skills and qualifications but also the personal qualities, empathy, and compassion required to work with individuals with complex needs. This policy applies to the recruitment of permanent staff, temporary and agency staff, volunteers, apprentices, and overseas workers, ensuring that we meet our duty of care and safeguard the well-being of the people we support.

We are committed to:

- Ensuring fairness and inclusivity in every aspect of recruitment, offering equal opportunities to all candidates, in line with the Equality Act 2010.
- Complying with CQC regulations, particularly Regulation 19, ensuring that we only employ individuals who are “fit and proper” to provide safe and effective care.
- Safeguarding our service users by conducting thorough checks at every stage of the recruitment process, including DBS checks, verification of references, and confirming previous employment history, particularly for roles involving vulnerable adults.
- Promoting accessibility by making reasonable adjustments to the recruitment process to ensure that candidates with learning disabilities, mental health needs, or autism can apply for positions and participate fully in the recruitment process.
- Ensuring confidentiality of all personal data in line with the UK GDPR and Data Protection Act 2018, ensuring transparency about how candidate data will be used and stored.
- Complying with relevant national standards and best practices for recruiting staff to support people with autism, learning disabilities, and mental health conditions, and ensuring staff are trained to meet these needs.

The Recruitment Policy and Procedure will be implemented at all stages of the recruitment process. We will continuously review and update the policy to reflect changes in legislation and best practice, ensuring our approach remains relevant, effective, and aligned with the requirements set out by CQC, Skills for Care, the Department of Health and Social Care (DHSC), and other relevant organizations.

Key Points of the Policy:

1. **Fairness and Legislation Compliance:** We are committed to ensuring that our recruitment process is fair, inclusive, and fully compliant with all applicable UK legislation and CQC regulations, including Regulation 19 of the Health and Social Care Act 2008 and the Equality Act 2010.
2. **Safeguarding and Compliance:** All candidates will undergo thorough background checks, including DBS checks, and verification of references and previous employment history, particularly for those with prior experience in health and social care, or with vulnerable adults and children.
3. **Inclusivity and Accessibility:** We will ensure that our recruitment processes are accessible and inclusive, making reasonable adjustments for candidates with disabilities, including those with learning disabilities, mental health needs, or autism. This includes ensuring candidates can easily access and understand our policy.
4. **Recruitment of Volunteers, Apprentices, and Overseas Workers:** Our policy covers the recruitment of volunteers, apprentices, and overseas workers (if applicable), ensuring that they are subject to the same safeguarding checks, suitable qualifications, and fit and proper person criteria as our permanent staff.
5. **Transparency and Data Protection:** All recruitment data will be handled in compliance with the Data Protection Act 2018 and UK GDPR, ensuring that all personal information is stored securely and used appropriately throughout the recruitment process.
6. **Continuous Monitoring and Improvement:** This policy will be regularly reviewed and updated to ensure it aligns with the latest CQC regulations, best practice standards, and relevant

legislation. We will continually assess and improve our recruitment practices to enhance the quality of care provided to service users.

4. OBJECTIVES

The primary objective of this Recruitment Policy and Procedure for Primus PLUS Healthcare is to ensure that our recruitment process adheres to all CQC regulations, relevant UK legislation, and best practice guidelines while providing high-quality care for adults with learning disabilities, mental health needs, and autism spectrum conditions (ASC) in our supported living services without personal care. The specific objectives of this policy are as follows:

1. To Ensure Compliance with Legal and Regulatory Requirements

- Regulation 19 (Fit and Proper Persons Employed): We aim to meet the requirements of Regulation 19 under the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014, ensuring that all staff are “fit and proper persons” to work with vulnerable adults in supported living settings. This includes verifying that candidates are suitable in terms of their qualifications, experience, and character to provide safe and effective care.
- Adherence to Relevant Legislation: The recruitment process must comply with all relevant UK legislation, including the Equality Act 2010, Data Protection Act 2018, and UK GDPR, ensuring that recruitment practices are lawful, transparent, and non-discriminatory.
- Safeguarding: We are committed to safeguarding vulnerable adults by ensuring that all employees undergo appropriate checks, such as DBS checks and reference verifications, in line with CQC requirements and Safeguarding Vulnerable Groups Act 2006.

2. To Promote Fairness, Transparency, and Inclusivity in Recruitment

- Fair and Inclusive Practices: We are committed to promoting a recruitment process that is inclusive and accessible to all applicants, ensuring fairness at every stage. This includes providing reasonable adjustments to accommodate individuals with learning disabilities, mental health needs, or autism spectrum conditions.
- Equal Opportunities: In line with the Equality Act 2010, we aim to ensure that all candidates are provided with equal opportunities to apply for positions, irrespective of race, gender, disability, sexual orientation, or other protected characteristics.

3. To Ensure that the Recruitment Process is Comprehensive, Consistent, and Transparent

- Clear Stages in Recruitment: The policy ensures that the recruitment process is clear, well-documented, and transparent. This includes the key stages of recruitment—advertising, application, shortlisting, interview, identity checks, DBS checks, references, and offer of employment—ensuring consistency and clarity in the selection process.
- Verification of Background and Employment History: The policy specifies the checks made at each stage of the recruitment process, including previous employment history, references, and verification of DBS and other relevant qualifications.
- Recruitment of Overseas Workers: In cases where we recruit overseas workers, we will ensure that all necessary checks (including right to work and qualification verification) are made to ensure compliance with UK immigration law and CQC standards.

4. To Ensure the Recruitment Process Is Accessible for Individuals with Learning Disabilities, Mental Health Needs, and Autism

- **Accessibility and Reasonable Adjustments:** We aim to make sure that candidates with learning disabilities, mental health needs, and autism spectrum conditions can access and understand our recruitment policy. We will make reasonable adjustments as needed, including providing accessible formats and communication support, to ensure that everyone has an equal opportunity to apply and participate in the recruitment process.
- **Specialist Knowledge for Specialist Roles:** The policy ensures that all recruitment efforts for roles supporting individuals with autism or learning disabilities specifically take into account the need for specialized knowledge and experience in these areas. This includes the provision of specialized training and ensuring the recruitment of staff who are adequately trained to meet the unique needs of these service users.

5. To Safeguard the Well-being of Service Users

- **Ensuring a Safe Environment:** The safety and well-being of our service users are our top priority. The recruitment process is designed to ensure that only those who are properly vetted and deemed suitable are employed to work with vulnerable adults. This includes conducting thorough DBS checks, reviewing references, and investigating any reasons for the termination of previous employment, especially if the individual has worked in health or social care or with children or vulnerable adults.
- **Clear Recruitment Complaints Procedure:** This policy includes a transparent and accessible recruitment complaints procedure that allows candidates to raise concerns about the recruitment process, ensuring accountability and addressing any issues or disputes that may arise.

6. To Ensure Compliance with Data Protection and Confidentiality Standards

- **UK GDPR Compliance:** We ensure that all personal data collected during the recruitment process is handled in compliance with the UK GDPR and Data Protection Act 2018. This includes ensuring that candidates' personal information is stored securely and used only for the purpose of recruitment.
- **Transparency with Data Handling:** Candidates will be informed about how their data will be used, stored, and protected, ensuring transparency and respect for their privacy.

7. To Monitor and Continuously Improve the Recruitment Process

- **Ongoing Evaluation and Auditing:** We will regularly review and audit the effectiveness of our recruitment practices, ensuring that they continue to meet CQC standards and legislative requirements. This includes gathering feedback from new employees and making necessary adjustments to improve the process.
- **Continuous Improvement:** By monitoring and evaluating the recruitment process, we aim to continuously improve our approach to hiring the best candidates and fostering an environment that supports both staff and service users.

5. DEFINITIONS

This section provides clear and concise definitions of key terms, acronyms, and abbreviations used in the Recruitment Policy and Procedure. These terms are central to understanding the policy and ensuring compliance with CQC regulations, UK legislation, and the standards for supporting individuals in supported living without personal care services, particularly for adults with learning disabilities, mental health needs, and autism spectrum conditions (ASC).

Key Terms and Definitions

1. CQC (Care Quality Commission)
 - Definition: The Care Quality Commission is the independent regulator for health and social care services in England. The CQC inspects, monitors, and regulates services to ensure they meet national standards of care.
 - Relevance: The CQC ensures that services, including those providing supported living, employ only those who meet the Fit and Proper Persons Employed criteria, outlined in Regulation 19.
2. Regulation 19: Fit and Proper Persons Employed
 - Definition: Regulation 19, as part of the Health and Social Care Act 2008, requires that providers ensure employees and volunteers are fit and proper to work with vulnerable individuals. This includes checks for criminal convictions, qualification verification, and ensuring competency for the role.
 - Relevance: Ensures that the recruitment process adheres to legal standards for the employment of staff, particularly those working with vulnerable adults, including people with learning disabilities, mental health needs, and autism spectrum conditions.
3. Person-Centred Care
 - Definition: Person-centred care refers to a care approach where the preferences, needs, and values of individuals are at the forefront of care planning and service delivery.
 - Relevance: In the context of supported living services, it ensures that services are tailored to the individual's needs and that their rights and preferences are respected at every stage of the care process, including recruitment.
4. Learning Disabilities (LD)
 - Definition: A learning disability is a condition that affects how a person understands information and how they communicate. It may impact an individual's ability to learn, make decisions, or perform everyday tasks.
 - Relevance: Understanding learning disabilities is critical for recruitment in supported living services, as staff must be equipped with the knowledge and skills to support individuals with these challenges in a respectful and effective manner.
5. Mental Health Needs
 - Definition: Mental health needs refer to conditions that affect a person's thinking, feeling, behaviour, or mood, such as depression, anxiety disorders, bipolar disorder, and schizophrenia.

- Relevance: Staff working with individuals with mental health needs must be appropriately trained to provide safe, supportive, and person-centred care.

6. Autism Spectrum Conditions (ASC)

- Definition: Autism Spectrum Conditions refer to a range of neurodevelopmental conditions that affect how a person communicates, interacts with others, and perceives the world. Conditions within the autism spectrum include autistic disorder, Asperger syndrome, and pervasive developmental disorder.
- Relevance: Understanding the spectrum of autism is essential for staff recruitment in supported living services, ensuring staff are adequately trained to support individuals with ASC.

7. DBS (Disclosure and Barring Service)

- Definition: The Disclosure and Barring Service (DBS) is a government agency that helps employers make safer recruitment decisions by providing criminal record checks and barring lists for individuals who wish to work with vulnerable groups.
- Relevance: The DBS check is a mandatory step in the recruitment process for staff working in care services, ensuring that individuals with criminal convictions that disqualify them from working with vulnerable people are not hired.

8. Right to Work

- Definition: Right to work refers to the legal entitlement of an individual to work in the UK, which is verified by the submission of specific documentation, such as a valid passport, visa, or work permit.
- Relevance: Ensures that all staff employed by Primus PLUS Healthcare are legally authorized to work in the UK, particularly when recruiting overseas workers.

9. Safeguarding

- Definition: Safeguarding refers to the measures taken to protect individuals from harm, abuse, neglect, and exploitation, particularly vulnerable adults in health and social care settings.
- Relevance: The recruitment policy is required to ensure that all staff understand and adhere to safeguarding practices, especially when working with individuals with learning disabilities, mental health needs, and autism spectrum conditions.

10. Equality Act 2010

- Definition: The Equality Act 2010 is legislation that protects individuals from discrimination, harassment, and victimization in employment, education, and other areas, based on characteristics such as disability, age, race, sex, sexual orientation, and more.
- Relevance: This act ensures that Primus PLUS Healthcare adheres to principles of non-discrimination, providing equal access to employment for candidates with disabilities or from diverse backgrounds.

11. UK GDPR (General Data Protection Regulation)

- Definition: The UK GDPR is the UK version of the EU's General Data Protection Regulation that governs the collection, use, and storage of personal data.
- Relevance: The policy ensures that all personal data collected during recruitment, such as application forms, interview notes, and DBS checks, is processed in compliance with data protection laws to protect candidates' privacy.

12. Induction Training

- Definition: Induction training refers to the training and orientation provided to new employees to familiarize them with the organization's policies, procedures, and role-specific expectations.
- Relevance: Ensures that all new staff, including those in supported living roles, receive adequate training to effectively support service users with learning disabilities, mental health needs, and autism spectrum conditions.

13. Fit and Proper Person

- Definition: A fit and proper person is an individual who meets the legal and professional standards necessary to work in a care setting, including competency, qualifications, and a clean criminal record, ensuring they are suitable to provide care to vulnerable people.
- Relevance: According to CQC Regulation 19, all staff must be fit and proper to be employed in roles where they provide care to vulnerable individuals.

14. Person Specification

- Definition: A person specification outlines the essential and desirable qualifications, experience, skills, and personal qualities required for a job role.
- Relevance: The person specification ensures that Primus PLUS Healthcare recruits staff with the right skills and experience to meet the needs of service users with learning disabilities, mental health needs, and autism.

Abbreviations

- ASC: Autism Spectrum Conditions
- CQC: Care Quality Commission
- DBS: Disclosure and Barring Service
- HR: Human Resources
- UK GDPR: UK General Data Protection Regulation
- LD: Learning Disabilities
- NMC: Nursing and Midwifery Council
- PSS: Person-Specific Support
- SFA: Skills for Care Accreditation

6. KEY LEGISLATION AND REGULATORY FRAMEWORK

The recruitment processes at Primus PLUS Healthcare are designed to comply with relevant CQC regulations and UK legislation to ensure the recruitment of safe, qualified, and compassionate individuals who are fit to work with adults with learning disabilities, mental health needs, and autism spectrum conditions (ASC) in supported living services without personal care. This section outlines the key legislation and regulatory frameworks that guide our recruitment practices, ensuring we meet legal obligations and uphold the highest standards of care.

1. Care Quality Commission (CQC)

The Care Quality Commission (CQC) is the independent regulator of health and social care services in England. The CQC ensures that services are safe, effective, caring, responsive, and well-led.

- Regulation 19: Fit and Proper Persons Employed under the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014 is a key requirement. This regulation stipulates that only fit and proper persons should be employed to provide care services. To meet this requirement, Primus PLUS Healthcare ensures that:
 - All staff are appropriately vetted.
 - Staff have the necessary qualifications, experience, and personal attributes to deliver high-quality care.
 - Comprehensive background checks (including DBS checks, references, and qualifications) are conducted.

Relevant CQC Guidelines:

- Regulation 19 (Fit and Proper Persons Employed): Ensures that staff have the necessary qualifications, experience, and character to provide care to vulnerable individuals. This includes comprehensive DBS checks, references, and verification of employment history.
- Regulation 18 (Staffing): Requires that staff are appropriately recruited and trained to meet the needs of service users, ensuring that adequate staff levels are maintained to provide safe, effective care.

2. Equality Act 2010

The Equality Act 2010 consolidates and strengthens previous anti-discrimination laws in the UK. The act provides protection against discrimination based on protected characteristics including:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex

- Sexual orientation

In line with this legislation, Primus PLUS Healthcare commits to ensuring that recruitment practices are free from discrimination and provide equal opportunities for all candidates. We will make reasonable adjustments for candidates with disabilities to ensure the recruitment process is accessible and inclusive, particularly for individuals with learning disabilities, mental health needs, or autism spectrum conditions (ASC).

3. The Health and Social Care Act 2008 (Regulated Activities) Regulations 2014

This act sets out the CQC regulations for the provision of regulated activities, including those related to staffing and recruitment.

- Regulation 19: Fit and Proper Persons Employed ensures that only suitable individuals are employed to work in care services. It requires that providers perform checks and balances, including background screening and references, to ensure that staff members have the required skills, qualifications, and integrity.

This regulation ensures that all staff employed in care roles meet the competency standards and undergo thorough checks to confirm that they are fit to work with vulnerable individuals.

4. The Safeguarding Vulnerable Groups Act 2006

The Safeguarding Vulnerable Groups Act 2006 created the Disclosure and Barring Service (DBS), which provides employers with access to criminal records and barring information to prevent unsuitable individuals from working with vulnerable adults and children.

- DBS Checks: As part of our recruitment process, all staff members undergo DBS checks to ensure that they have not been involved in any criminal activity that would disqualify them from working with vulnerable individuals.

This act underpins the safeguarding process at Primus PLUS Healthcare, ensuring that only staff who have passed the required checks are employed to work with vulnerable service users.

5. The Data Protection Act 2018 (UK GDPR)

The Data Protection Act 2018 governs the processing of personal data in the UK and implements the General Data Protection Regulation (GDPR). It ensures that personal data is:

- Collected lawfully and transparently.
- Used for specific, legitimate purposes.
- Retained securely and for no longer than necessary.

Primus PLUS Healthcare is committed to complying with the UK GDPR and the Data Protection Act 2018 throughout the recruitment process. All personal data collected from candidates will be stored securely, used only for recruitment purposes, and processed in line with data protection principles.

6. The Autism Act 2009

The Autism Act 2009 is the first piece of UK legislation specifically aimed at improving services and support for people with autism. The act requires that public services, including care services, consider the needs of individuals with autism in their service planning and delivery.

- Recruitment of Staff for Autism-Specific Services: As part of our recruitment process, Primus PLUS Healthcare ensures that staff are not only qualified but also trained to meet the specific

needs of individuals with autism. This includes seeking staff with relevant experience, or a willingness to undergo autism-specific training to provide the best care possible to service users with autism.

7. The Mental Health Act 1983 (Amended)

The Mental Health Act 1983 provides the legal framework for the care and treatment of individuals with mental health conditions. This includes rights and safeguards for individuals who are detained in hospital under the act and sets out procedures for the treatment and care of individuals with mental health disorders.

- **Recruitment of Mental Health Support Workers:** Staff recruited to support individuals with mental health needs must be adequately trained and competent to support individuals in a respectful and safe manner. This includes specific knowledge of mental health conditions, the Mental Health Act 1983, and the Care Act 2014.

8. The Care Act 2014

The Care Act 2014 provides the framework for adult social care in England. It ensures that care services are personalized, meet the needs of service users, and are delivered safely.

- **Recruitment to Meet Service User Needs:** The Care Act emphasizes the need for appropriately trained and skilled staff who can meet the specific needs of individuals with learning disabilities, mental health needs, and autism. Staff must be fit to provide safe care and support to individuals in line with the person-centred care approach outlined in the Care Act.

9. The Equality and Human Rights Commission (EHRC)

The Equality and Human Rights Commission (EHRC) provides guidance on implementing the Equality Act 2010 and works to eliminate discrimination and promote human rights.

- **Promoting Equality in Recruitment:** Primus PLUS Healthcare ensures that our recruitment process adheres to EHRC guidelines by eliminating discrimination and ensuring that everyone, regardless of background, has access to recruitment opportunities and the support they need to apply and succeed.

7. RECRUITMENT PROCESS OVERVIEW

The Recruitment Process Overview for Primus PLUS Healthcare outlines the clear, structured, and fair approach to hiring staff for our supported living services without personal care, particularly for adults with learning disabilities, mental health needs, and autism spectrum conditions (ASC). This process is designed to meet the highest standards of compliance with CQC regulations, UK legislation, and the specific needs of our service users.

The recruitment process is structured to ensure that every stage is conducted with fairness, transparency, and inclusivity, ensuring we employ the most qualified and suitable individuals who are capable of delivering high-quality care to vulnerable adults. The policy aligns with the following regulations:

- **CQC Regulation 19 (Fit and Proper Persons Employed):** Ensuring only those suitable to provide care are employed.

- Equality Act 2010: Promoting fairness and non-discrimination in all recruitment activities.
- UK GDPR and Data Protection Act 2018: Ensuring data protection throughout the recruitment process.
- Care Act 2014: Ensuring that recruitment practices align with the provisions for care and support of vulnerable adults.

1. Job Vacancy Identification and Advertising

The recruitment process begins with identifying a need for a new position or a vacancy within Primus PLUS Healthcare. This may be due to staff turnover, expansion, or the need for specific expertise to meet service users' needs.

- Advertising the Vacancy:
 - All vacancies are advertised through accessible and appropriate channels, such as Skills for Care, NHS Jobs, and other disability-specific recruitment platforms to ensure that we reach a diverse pool of candidates.
 - The job advertisement will clearly outline the role's duties, essential qualifications, and experience required. We will explicitly highlight our commitment to diversity and inclusion, encouraging applications from underrepresented groups, including individuals with learning disabilities, mental health needs, and autism spectrum conditions.
- Job Description and Person Specification:
 - A clear job description and person specification will be developed for each vacancy, specifying the required qualifications, experience, and personal qualities.
 - The person specification will ensure that applicants have the necessary skills and understanding to support individuals with complex needs, including specific training or experience working with adults with learning disabilities, mental health conditions, or autism.

2. Application Process

Candidates who wish to apply for the position must submit an application form, which will capture key details such as:

- Personal information: Name, contact details, and right to work in the UK.
- Qualifications and experience: Relevant educational qualifications, certifications, and work history.
- Experience with vulnerable adults: For roles in supported living services, we require candidates to demonstrate relevant experience in care settings, particularly with individuals with learning disabilities, mental health needs, or autism.

The application form will ensure that candidates provide sufficient detail to be assessed fairly against the person specification and relevant legislation. We will encourage candidates to disclose any reasonable adjustments they may need during the recruitment process.

3. Shortlisting

- Shortlisting Process:

- After the closing date for applications, a shortlisting panel will review all applications to ensure that candidates meet the criteria set out in the job description and person specification.
- We will assess candidates based on their qualifications, experience, and personal attributes, paying particular attention to experience working with vulnerable groups, and ensuring that candidates have the appropriate values and understanding required for the role.
- Inclusivity in Shortlisting:
 - The process will ensure that no candidate is discriminated against based on protected characteristics such as age, disability, race, or gender. This aligns with the Equality Act 2010 and ensures a fair recruitment process.

4. Interview Process

- Structured Interview:
 - Shortlisted candidates will be invited to participate in a structured interview to assess their ability to meet the requirements of the role. The interview will include questions related to:
 - Experience and qualifications: Particularly in working with individuals with learning disabilities, mental health needs, or autism spectrum conditions.
 - Values and empathy: Understanding of person-centred care and the ability to meet the needs of vulnerable individuals.
 - Scenario-based questions: To assess the candidate's approach to handling situations specific to supported living, such as managing challenging behaviours or supporting individuals with autism in community settings.
- Inclusive Interview Practices:
 - We will ensure that reasonable adjustments are made for candidates with learning disabilities, mental health conditions, or autism during the interview process to ensure fairness and accessibility. For example, this could include providing interview questions in accessible formats or offering additional support during the interview.
- Assessment: Candidates may also be asked to complete a practical assessment or task relevant to the role, such as demonstrating their understanding of autism spectrum conditions or their ability to support individuals with learning disabilities.

5. Checking Identity and Eligibility to Work

- Identity Verification:
 - All candidates will undergo an identity check to confirm that they are who they claim to be. This will include verifying government-issued IDs and proof of address.
- Right to Work in the UK:
 - In compliance with UK immigration law, we will ensure that all candidates have the legal right to work in the UK. This may include verifying visa status, work permits, and checking immigration documentation for overseas workers.

6. Pre-Employment Checks

- DBS Check:
 - All successful candidates will be required to undergo a DBS check (Disclosure and Barring Service) to assess whether they have any criminal convictions that would disqualify them from working with vulnerable adults. This is in line with the Safeguarding Vulnerable Groups Act 2006.
- References:
 - Two references will be required for all candidates, one of which should ideally be from a previous employer in a health or social care setting, particularly if they have worked with vulnerable adults. These references will help verify the candidate's professional conduct, character, and suitability for the role.
 - The references will also provide insight into the candidate's previous employment history and the reason for any previous employment ending, particularly if it was in a care-related setting.
- Qualifications:
 - Verification of qualifications will be carried out to ensure the candidate meets the required educational and professional standards for the role. This is particularly important in ensuring that staff members are fit to work with vulnerable individuals, including those with learning disabilities, mental health needs, and autism.

7. Offer of Employment

- Once all checks are completed and the candidate has been deemed suitable for the role, an offer of employment will be made. The offer will include:
 - The role and responsibilities.
 - Salary and benefits.
 - Terms of employment, including the probationary period, and any required training.
 - A clear contract of employment outlining expectations, safeguarding responsibilities, and legal obligations.
- New Employee Induction:
 - New employees will undergo an induction programme designed to familiarize them with Primus PLUS Healthcare's policies, CQC safeguarding standards, and their specific responsibilities in supporting individuals with complex needs.

8. Recruitment of Volunteers and Apprentices (If Applicable)

- Volunteers and apprentices will be recruited in line with the same principles as full-time staff, with appropriate DBS checks and training provided. Volunteers or apprentices will undergo the same safeguarding checks to ensure they are suitable to work with vulnerable adults.

9. Ongoing Monitoring and Feedback

- After recruitment, Primus PLUS Healthcare will continuously monitor the effectiveness of the recruitment process, ensuring that it is inclusive, transparent, and complies with legal and

regulatory standards. Feedback from candidates and newly hired staff will be used to improve the recruitment process and ensure it remains effective and fair.

8. INDUCTION AND TRAINING

At Primus PLUS Healthcare, we recognize the importance of providing comprehensive induction and ongoing training to all staff in order to ensure they are well-equipped to provide safe, effective, and compassionate care to adults with learning disabilities, mental health needs, and autism spectrum conditions (ASC) in our supported living services without personal care. This section outlines the induction and training procedures, ensuring compliance with CQC regulations, UK legislation, and best practice guidelines.

1. Induction Programme

The induction programme is designed to ensure that new employees are fully prepared for their roles and understand the values, policies, and procedures at Primus PLUS Healthcare. All staff, regardless of their role, will undergo a structured induction process to ensure they are aligned with the high standards required for working in supported living services for vulnerable adults.

Key Elements of the Induction Programme:

- Introduction to Primus PLUS Healthcare:
 - Overview of the organization's mission, values, and service user groups.
 - Overview of the CQC regulations and how they apply to the services provided.
- Health and Safety:
 - Training on health and safety policies, including risk assessments, fire safety, and manual handling procedures.
 - Procedures for responding to emergencies, such as medical emergencies or safeguarding concerns.
- Safeguarding:
 - Safeguarding Vulnerable Adults training, in compliance with the Care Act 2014 and Safeguarding Vulnerable Groups Act 2006, ensuring that staff are aware of their duties to protect service users from abuse and neglect.
 - DBS and other background checks to ensure safeguarding standards are maintained.
- Person-Centred Care:
 - Introduction to the person-centred care approach, which is at the core of all the services we provide.
 - Training in individual care planning, respecting the preferences, choices, and needs of service users with learning disabilities, mental health needs, and autism.
- Legislation and Policies:
 - Comprehensive training on relevant UK legislation, including the Care Act 2014, Equality Act 2010, and the Mental Health Act 1983 (amended).

- Understanding of Data Protection (UK GDPR and Data Protection Act 2018) and how to manage sensitive information.
- Introduction to the Supported Living Environment:
 - Familiarization with the specific supported living services and any specialized training necessary to provide care for adults with autism, mental health conditions, and learning disabilities.
 - Introduction to the daily routines, risk assessments, and support strategies tailored to service users' needs.
- Code of Conduct and Ethical Standards:
 - Introduction to ethical practices and professional standards that guide staff in their interactions with service users, families, and colleagues.
 - Ensuring staff are aware of the CQC's fundamental standards and the expected conduct and responsibilities in their roles.

Duration of Induction:

- The induction will typically take place over the first week of employment but may be extended as needed, depending on the complexity of the service users' needs and the role's requirements.

2. Ongoing Training

After completing the induction, all staff will continue to receive ongoing training to ensure they maintain the necessary skills, knowledge, and competency required to deliver high-quality care in line with the CQC standards and best practice. This training will be updated regularly and will cover both mandatory and role-specific areas.

Mandatory Training:

All staff will be required to complete mandatory training to ensure they meet the legal and regulatory requirements for working with vulnerable adults in supported living settings. This training includes:

- **Safeguarding Adults:** In-depth training on safeguarding practices to prevent and respond to abuse and neglect, in line with the Safeguarding Vulnerable Groups Act 2006 and the Care Act 2014.
- **Mental Health Awareness:** Training on how to support individuals with mental health conditions, including understanding the Mental Health Act 1983 and Mental Capacity Act 2005.
- **Autism and Learning Disabilities:** Specialized training in how to support individuals with autism spectrum conditions and learning disabilities, focusing on behavioural support, communication, and specific care needs.
- **Manual Handling:** Training in the correct procedures for safely supporting individuals who require physical assistance, including lifting and transferring techniques.
- **Medication Administration:** Where applicable, training in the safe administration and management of medications for service users with complex needs.

- Equality and Diversity: Ongoing training in Equality Act 2010, ensuring that all staff understand how to respect the rights and dignity of service users, promoting an inclusive environment free from discrimination.
- Health and Safety: Ongoing training in workplace safety, including risk assessments, infection control, and handling hazardous materials.

Specialized Training:

For staff working in roles with specific responsibilities (e.g., autism specialists or mental health support workers), specialized training will be provided to ensure they have the necessary skills and expertise to meet the needs of service users with complex conditions.

Specialized training topics may include:

- Advanced autism care: Understanding the specific challenges of autism spectrum conditions and how to develop tailored care plans.
- Crisis intervention and de-escalation: Techniques for managing and de-escalating challenging behaviour in a safe, supportive way.
- Person-Centred Planning: Advanced training in the person-centred care approach, ensuring staff can create and implement individualized support plans that promote the independence and well-being of service users.

Continuing Professional Development (CPD):

- Staff will be encouraged and supported to participate in CPD to maintain and improve their skills throughout their careers at Primus PLUS Healthcare.
- This may include attending workshops, seminars, or pursuing relevant vocational qualifications to support career development within the healthcare sector.

3. Supervision and Appraisal

Staff will be regularly supervised and assessed to ensure they are meeting the required standards of care and to identify any further training or support needs. Supervision and appraisals will include:

- Regular one-to-one supervision sessions to discuss performance, well-being, and development.
- Annual appraisals to review achievements, set personal development goals, and identify further training needs.
- Feedback from supervisors and colleagues to ensure that staff are continually improving their practice and are equipped to handle any challenges in delivering care to service users.

4. Record Keeping and Compliance

- Training Records: A comprehensive record of all completed training and qualifications will be maintained for each employee. This will ensure compliance with CQC standards and enable Primus PLUS Healthcare to demonstrate that staff are appropriately trained and competent.
- Review of Training Needs: The training needs of staff will be reviewed regularly as part of the supervision and appraisal process, and new training will be provided when required, based on changing needs or new regulations.

5. Evaluation and Continuous Improvement

- **Training Effectiveness:** Regular evaluations of training programs will be conducted to ensure their relevance and effectiveness. This includes feedback from staff on the training provided and the impact it has on their ability to deliver care.
- **Ongoing Improvement:** The training program will be reviewed periodically to ensure it reflects the latest CQC guidelines, best practices, and any changes in legislation or service user needs.

9. SAFEGUARDING AND MONITORING

At Primus PLUS Healthcare, safeguarding is a core priority in our recruitment and employment practices. We are committed to ensuring that all staff working in supported living services without personal care for adults with learning disabilities, mental health needs, and autism spectrum conditions (ASC) are thoroughly vetted to provide safe, respectful, and high-quality care. This section of the Recruitment Policy and Procedure outlines our safeguarding and monitoring procedures, which are designed to ensure compliance with CQC regulations, UK legislation, and the highest standards of care.

1. Safeguarding Commitment

We understand the responsibility we have in safeguarding our service users, particularly vulnerable adults. All employees at Primus PLUS Healthcare are expected to adhere to strict safeguarding protocols to protect service users from abuse, neglect, and exploitation. This includes ensuring that staff:

- Are fit and proper persons to work with vulnerable adults.
- Receive comprehensive safeguarding training.
- Are constantly monitored to ensure their conduct remains in line with safeguarding standards.

Key Safeguarding Measures:

- **DBS Checks:** We will conduct Enhanced DBS (Disclosure and Barring Service) checks for all staff, volunteers, and apprentices. This is in accordance with the Safeguarding Vulnerable Groups Act 2006, ensuring that individuals with a history of harmful behaviour or criminal convictions related to vulnerable adults are not employed.
- **Right to Work Checks:** Verification that all employees have the legal right to work in the UK is carried out, ensuring compliance with immigration laws and safeguarding vulnerable adults from potential abuse.
- **Safeguarding Training:** All new staff will undergo safeguarding training during their induction, and this training will be refreshed regularly in line with best practices and legislative changes.

2. Safeguarding Policy and Procedures

The Primus PLUS Healthcare Safeguarding Policy outlines the processes that must be followed to ensure that our staff:

- Are aware of their safeguarding responsibilities and understand how to report safeguarding concerns.
- Have clear protocols for responding to and reporting allegations of abuse or neglect.

- Have access to appropriate support if they encounter safeguarding concerns in the course of their work.

Key Safeguarding Protocols:

- Zero tolerance of abuse: We have a zero-tolerance policy towards abuse, neglect, and exploitation of service users.
- Clear reporting mechanisms: Safeguarding concerns should be reported to designated safeguarding leads within the organization, in accordance with local safeguarding authorities and CQC guidelines.
- Whistleblowing: Employees are encouraged and protected when whistleblowing on any concerns related to abuse or neglect. We maintain confidentiality to protect those who raise concerns.
- Safeguarding supervision: Staff are provided with regular supervision to discuss any safeguarding concerns, ensuring that they feel supported and are operating in line with safeguarding best practices.

3. Monitoring Safeguarding Practices

To ensure that safeguarding practices are consistently adhered to and that service users continue to receive the highest standard of care, we implement a comprehensive monitoring system. This includes regular audits, reviews, and evaluations to assess the effectiveness of our safeguarding procedures.

Monitoring and Evaluation:

- Regular Safeguarding Audits: Safeguarding practices are audited on a regular basis to ensure compliance with CQC standards, Care Act 2014, and local safeguarding boards.
- Staff Supervision and Feedback: Regular one-to-one supervision sessions for staff ensure that safeguarding practices are being followed and provide an opportunity to raise concerns in a confidential manner. This also allows for performance monitoring and targeted support.
- Incident Reporting: Any safeguarding incidents or concerns are logged and investigated thoroughly. Reports will be reviewed by senior management to ensure that appropriate actions have been taken.
- Feedback from Service Users and Families: Service users and their families are encouraged to provide feedback on the care received, and any concerns raised are taken seriously and addressed promptly.

4. Preventing and Responding to Abuse

Primus PLUS Healthcare ensures that we actively work to prevent abuse and take immediate, appropriate action if abuse or neglect is suspected. We follow a proactive approach to safeguarding by providing staff with the tools, knowledge, and support they need to identify, prevent, and address abuse in all forms.

Preventing Abuse:

- Staff Training: All staff receive mandatory safeguarding training as part of their induction and on an ongoing basis, which covers:
 - Identifying signs of abuse and neglect.

- Responding appropriately to potential abuse.
- Duty of care and reporting procedures.
- Understanding the Mental Capacity Act 2005 (MCA) and Deprivation of Liberty Safeguards (DoLS), especially in relation to individuals with learning disabilities and autism.
- Person-Centred Care Plans: We ensure that person-centred care plans are created for each service user, ensuring their preferences and rights are respected, and minimizing the risk of abuse.

Responding to Abuse:

- Immediate Action: If abuse is suspected or reported, immediate action will be taken. This includes:
 - Ensuring the safety of the service user and moving them to a safe environment if necessary.
 - Reporting the incident to the relevant authorities (e.g., local safeguarding boards, CQC, and police if required).
 - Providing support to the staff involved in managing the situation appropriately, ensuring that appropriate support is available.
- Investigation: A thorough investigation will be conducted in accordance with CQC guidelines and local safeguarding policies, with the aim of identifying any systemic issues that may need addressing.

5. Monitoring Staff Performance and Well-being

In addition to safeguarding, Primus PLUS Healthcare is committed to ensuring that staff are performing at their best and are supported in their roles. This includes:

- Supervision: Regular supervision sessions for all staff to discuss their performance, identify any areas for improvement, and ensure that they continue to meet the standards of care required.
- Performance Reviews: Annual appraisals will be conducted to assess staff performance and provide constructive feedback.
- Well-being Support: Staff will have access to resources and support for their mental health and well-being, recognizing that those working in the care sector may face challenges when providing care to vulnerable individuals.

6. Compliance with National and Local Safeguarding Frameworks

Primus PLUS Healthcare adheres to all national and local safeguarding frameworks, including:

- CQC Safeguarding Standards: Ensuring compliance with CQC regulations and safeguarding requirements for all staff working with vulnerable adults.
- Local Safeguarding Authorities: Collaborating with local safeguarding boards to ensure all safeguarding practices are aligned with the best practices and the needs of the communities we serve.

- Autism and Mental Health Safeguarding: We provide specialized training for staff on safeguarding individuals with autism and mental health conditions, ensuring that staff are aware of the unique needs of these service users.

10. EQUALITY AND DIVERSITY

At Primus PLUS Healthcare, we are committed to ensuring that our recruitment practices are fair, inclusive, and fully compliant with all CQC regulations and UK legislation. We understand that a diverse workforce enriches our ability to provide high-quality care and creates a positive environment for both staff and service users. This section outlines our approach to ensuring equality and diversity in recruitment, promoting inclusivity, and ensuring that every candidate, regardless of their background or circumstances, is treated fairly throughout the hiring process.

The following equality and diversity principles are integral to our recruitment procedures:

1. Commitment to Equality and Diversity

We are fully committed to ensuring that equality and diversity are embedded in all aspects of the recruitment process. This includes:

- Fair treatment of all applicants, regardless of their age, disability, gender, gender identity, sexual orientation, race, ethnicity, religion, belief, marital status, pregnancy, or maternity status.
- Equal access to recruitment opportunities, ensuring that our hiring practices comply with the Equality Act 2010 and support the employment of individuals from protected groups.

Our recruitment processes are specifically designed to:

- Attract diverse applicants who are qualified to work with adults with learning disabilities, mental health needs, and autism spectrum conditions (ASC).
- Ensure that individuals from underrepresented and disadvantaged groups are provided with equal opportunities to be considered for roles at Primus PLUS Healthcare.
- Provide reasonable adjustments to candidates with disabilities or specific needs to ensure that the recruitment process is accessible to all.

2. Compliance with Relevant Legislation

We comply with all relevant UK equality and discrimination legislation to ensure a fair, transparent, and inclusive recruitment process. The key regulations we adhere to include:

- Equality Act 2010: This act protects individuals from discrimination based on protected characteristics such as age, disability, gender, race, religion, sexual orientation, etc. We ensure our recruitment practices do not discriminate against any candidates, and we take steps to promote diversity at all levels of employment.
- The Human Rights Act 1998: We uphold the rights of individuals as protected by this act, particularly in ensuring dignity, autonomy, and freedom from discrimination in the recruitment process.

- The Equality and Human Rights Commission (EHRC): As a government body, the EHRC offers guidance and best practices for promoting equality and protecting human rights. Primus PLUS Healthcare follows these recommendations to ensure a high standard of equality and diversity in recruitment.

3. Ensuring Accessibility for All Candidates

We recognize that some applicants may require additional support during the recruitment process, particularly individuals with learning disabilities, mental health needs, or autism. To address this, we have implemented several measures to ensure our recruitment process is accessible and inclusive:

- Reasonable Adjustments: In line with the Equality Act 2010, we will make reasonable adjustments for applicants with disabilities. These adjustments may include:
 - Providing alternative formats of application forms (e.g., large print, braille, or digital formats).
 - Offering support during interviews, such as assistance in reading questions or providing a more structured interview format.
 - Offering flexible interview arrangements, such as additional time or the option to attend interviews in a setting that is comfortable for the candidate.
- Specialized Support for Autistic Candidates: Understanding the unique needs of individuals with autism, we offer tailored support for candidates with autism spectrum conditions. This may involve:
 - Using clear, structured communication during the interview process.
 - Offering a quiet, less stimulating environment during interviews to reduce sensory overload.
- Clear Communication: We use clear, simple language in job advertisements, applications, and interviews to ensure that our recruitment process is easy to understand for all applicants, including those with learning disabilities.

4. Inclusive Recruitment Practices

Our recruitment process is designed to be inclusive and ensure that no one is excluded from applying due to their background, identity, or personal circumstances. This includes:

- Diverse Recruitment Channels: We advertise vacancies through a range of platforms to reach a broad spectrum of potential candidates. These may include:
 - Specialist job boards focused on disability and diversity recruitment.
 - Partnerships with local organisations that support learning disability, mental health, and autism communities.
 - Collaboration with voluntary organizations and charities that work with underrepresented groups.
- Inclusive Interview Panel: Our interview panels are diverse and include staff members from varied backgrounds to ensure fair assessment. This practice reduces the risk of unconscious bias and encourages diverse perspectives in hiring decisions.

- Diversity Training for Recruiters: All those involved in the recruitment process undergo training on unconscious bias, cultural competence, and disability awareness to ensure they are equipped to assess candidates fairly and inclusively.

5. Eliminating Discrimination and Bias

To ensure that no discrimination takes place during recruitment, Primus PLUS Healthcare has implemented the following safeguards:

- Blind Recruitment: Where possible, we remove personal information (such as name, age, gender, and ethnicity) from the initial stages of the application process to prevent unconscious bias.
- Structured Interviews: Interviews are conducted using a structured format, ensuring that all candidates are asked the same questions and assessed based on the criteria that are relevant to the job role.
- Clear Selection Criteria: The job description and person specification are designed to focus on the qualifications, experience, and personal attributes needed to perform the job effectively. This ensures that recruitment decisions are made based on merit, not personal characteristics.

6. Monitoring Equality and Diversity in Recruitment

Primus PLUS Healthcare regularly monitors the effectiveness of its equality and diversity efforts to ensure that our recruitment practices are inclusive and that we are meeting our obligations under the Equality Act 2010 and other relevant legislation. We track key metrics such as:

- Diversity of applicants: Analysing the diversity of candidates applying for roles, ensuring we are attracting a wide range of applicants from different backgrounds.
- Success rate of diverse candidates: Monitoring the success rate of diverse applicants in securing roles, ensuring that there are no barriers to the hiring process for underrepresented groups.
- Feedback from candidates: Gathering feedback from applicants (including those who were not successful) to ensure that the recruitment process is fair, inclusive, and accessible.

We also conduct regular reviews of recruitment policies and procedures to ensure they are aligned with evolving best practices and legislative requirements.

7. Equality and Diversity in the Workforce

We believe that diversity is essential in fostering a positive work environment and ensuring that our services are responsive to the needs of all service users. At Primus PLUS Healthcare, we are committed to:

- Promoting diversity in all levels of the organization, from entry-level staff to senior management.
- Supporting employees from diverse backgrounds, including individuals with learning disabilities, mental health conditions, and autism spectrum conditions, ensuring that they have the support they need to thrive in the workplace.

11. RECRUITMENT COMPLAINTS PROCEDURE

At Primus PLUS Healthcare, we are committed to ensuring that our recruitment process is transparent, fair, and inclusive for all candidates. We understand that, despite our best efforts, there may be instances where candidates feel that the recruitment process has not been conducted fairly or in accordance with the policies outlined in this Recruitment Policy and Procedure.

This Recruitment Complaints Procedure ensures that any concerns or complaints raised by candidates are addressed promptly, fairly, and transparently, in line with CQC regulations, UK legislation, and best practice standards.

1. Overview of the Complaints Procedure

The Recruitment Complaints Procedure allows candidates to raise concerns about any part of the recruitment process, from the initial application stage to the outcome of an interview or job offer. We are committed to resolving complaints quickly and efficiently to ensure that all applicants are treated with dignity and respect.

Candidates can make a complaint about issues such as:

- Discrimination or bias during the recruitment process (e.g., due to race, age, gender, disability, or other protected characteristics as defined by the Equality Act 2010).
- A lack of transparency in how decisions were made (e.g., shortlisting, interviews, or final selection).
- Concerns about the application of reasonable adjustments for candidates with disabilities.
- Breach of confidentiality or improper handling of personal data (in accordance with UK GDPR and the Data Protection Act 2018).

2. How to Make a Complaint

Candidates wishing to make a complaint about any aspect of the recruitment process should follow the steps outlined below:

Step 1: Informal Resolution

- Initial Contact: We encourage candidates to address any concerns informally first. If a candidate feels that there has been an issue with the recruitment process, they should contact the recruitment coordinator or the recruitment team directly to discuss their concern.
- Time Frame: Candidates should raise concerns as soon as possible after the incident occurs, ideally within 5 working days of the event or decision that prompted the complaint.
- Response: The recruitment team will aim to respond to informal complaints within 3 working days to clarify the situation and, where possible, resolve the issue.

Step 2: Formal Complaint

- Written Complaint: If the issue is not resolved informally, candidates can submit a formal complaint in writing. The complaint should be submitted to the HR department or Recruitment Manager, detailing:
 - The nature of the complaint.
 - The specific part of the recruitment process in question.

- Any evidence or supporting documentation.
- Acknowledgement: The HR department will acknowledge receipt of the formal complaint within 2 working days of receiving it and will provide the candidate with an outline of how the complaint will be investigated.

Step 3: Investigation and Outcome

- Investigation: The HR department or an appointed independent investigator will review the complaint, conducting an impartial investigation. This may include reviewing recruitment records, interviewing relevant staff members, and gathering any other necessary evidence.
- Decision: The outcome of the investigation will be communicated to the candidate within 10 working days of receiving the formal complaint. If further time is required for the investigation, the candidate will be informed of the revised timeline.

3. How Complaints are handled

- Impartial Investigation: All complaints will be handled impartially and confidentially. We will ensure that there is no conflict of interest and that the investigation is conducted by individuals who were not involved in the recruitment process.
- Confidentiality: All complaints will be treated with the utmost confidentiality. Information will only be shared with those directly involved in the investigation process or as required by law (such as compliance with UK GDPR).
- Fairness and Non-Retaliation: Primus PLUS Healthcare ensures that candidates who raise a complaint will not be subject to any form of retaliation or discrimination as a result of raising a concern. All candidates will be treated with fairness and respect throughout the process.

4. Appeal Process

If the candidate is dissatisfied with the outcome of the formal investigation or the resolution provided, they have the right to appeal the decision. The appeal process includes the following steps:

Step 1: Appeal Submission

- Appeal Request: The candidate must submit their appeal in writing to the HR Director within 5 working days of receiving the formal decision. The appeal should outline the reasons for dissatisfaction and any additional evidence they wish to provide.

Step 2: Appeal Review

- Independent Review: An independent review panel (comprised of senior staff members not involved in the original investigation) will review the complaint and the initial investigation's findings. The panel may request additional information or conduct further interviews if necessary.

Step 3: Final Decision

- Outcome: The final decision of the appeal will be communicated to the candidate within 10 working days of receiving the appeal. The decision will be final and will include any actions taken as a result of the appeal, such as changes to recruitment procedures or practices.

5. Actions Following a Complaint

If the complaint is upheld, Primus PLUS Healthcare will take appropriate corrective action. This could include:

- Reviewing recruitment practices to ensure compliance with CQC regulations, UK equality legislation, and best practices.
- Providing additional training to staff involved in the recruitment process to prevent similar issues from arising in the future.
- Addressing any systemic issues identified during the investigation, such as improving accessibility for candidates with disabilities or increasing transparency in the recruitment process.

6. Monitoring and Improvement

To ensure continuous improvement, Primus PLUS Healthcare will:

- Monitor complaint trends to identify any recurring issues and take proactive steps to address them.
- Review recruitment policies and procedures annually, making adjustments as necessary to ensure they remain compliant with CQC regulations, UK equality legislation, and other relevant standards.
- Report any significant findings from the complaints process to senior management for review and action as part of our quality assurance framework.

7. Access to the Recruitment Complaints Procedure

- Public Access: The Recruitment Complaints Procedure is made available to all candidates during the recruitment process. Information on how to submit a complaint will be included in the candidate welcome pack and on the company website.
- Support: If a candidate has difficulty understanding the complaints procedure (for example, due to a learning disability, mental health need, or autism spectrum condition), support will be provided to ensure they can navigate the process. This may include assistance from a designated staff member or the provision of accessible materials.

12. REGULATORY COMPLIANCE

At Primus PLUS Healthcare, we are committed to ensuring that our recruitment processes are fully compliant with CQC regulations, UK legislation, and relevant national standards. Compliance with these regulatory requirements is critical to ensuring the safety, well-being, and quality of care for the individuals we support, particularly adults with learning disabilities, mental health needs, and autism spectrum conditions (ASC). This section outlines the key regulations and laws that Primus PLUS Healthcare adheres to in the recruitment process.

1. Care Quality Commission (CQC) Compliance

The Care Quality Commission (CQC) is the regulatory body for health and social care services in England, ensuring that providers meet the required standards of care.

- Regulation 19: Fit and Proper Persons Employed: This regulation requires that we ensure all staff are suitable for their roles, particularly when working with vulnerable adults. We comply by:
 - Conducting thorough DBS checks and verifying references.
 - Ensuring that staff possess the necessary qualifications, skills, and experience for the roles they are appointed to.
 - Ensuring staff are fit and proper persons, which involves checking for any criminal convictions, including those related to abuse or neglect.
- Regulation 18: Staffing: This regulation requires that we have enough qualified staff to meet the needs of service users. In line with this, we ensure that our recruitment process results in hiring sufficient staff with the appropriate qualifications and experience to meet the needs of service users with learning disabilities, mental health needs, and autism.
- CQC Safeguarding Standards: We ensure our recruitment processes are aligned with CQC safeguarding standards, safeguarding vulnerable adults from potential abuse. This includes training staff on safeguarding policies and ensuring all staff understand their responsibility to report any concerns.

2. Equality Act 2010

The Equality Act 2010 consolidates and strengthens previous anti-discrimination laws in the UK. It ensures that individuals are protected from discrimination on the basis of protected characteristics, including:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

Primus PLUS Healthcare ensures that our recruitment policies and procedures comply with the Equality Act 2010 by:

- Ensuring all applicants are given equal opportunities, regardless of their background, gender, age, disability, or other protected characteristics.
- Ensuring reasonable adjustments are made for candidates with disabilities during the recruitment process, including providing accessible interview formats or interview locations as needed.
- Continuously reviewing our recruitment practices to ensure they are non-discriminatory and inclusive.

3. The Data Protection Act 2018 and UK GDPR

The Data Protection Act 2018 and UK General Data Protection Regulation (UK GDPR) govern the collection, processing, and storage of personal data in the UK. These laws ensure that personal data is protected and handled with care.

Primus PLUS Healthcare adheres to the following data protection principles to ensure compliance with these regulations:

- Lawful, fair, and transparent processing: We process personal data in a lawful, fair, and transparent manner, ensuring candidates are fully informed about how their data will be used.
- Data minimization: We only collect and process personal data that is necessary for recruitment purposes.
- Storage limitation: We store personal data for no longer than necessary and ensure it is securely disposed of when no longer required.
- Confidentiality: All data collected during the recruitment process is kept confidential and secure. We have procedures in place to ensure that only authorized personnel have access to recruitment data.

4. The Safeguarding Vulnerable Groups Act 2006

The Safeguarding Vulnerable Groups Act 2006 established the Disclosure and Barring Service (DBS), which ensures that individuals who work with vulnerable adults or children are suitably checked and do not pose a risk to those they care for.

- DBS Checks: As part of our recruitment process, all staff will undergo Enhanced DBS checks, ensuring that they do not have any criminal convictions or other relevant information that would disqualify them from working with vulnerable individuals. This is a core element of Regulation 19 of the Health and Social Care Act 2008.

5. The Mental Health Act 1983 (Amended)

The Mental Health Act 1983 (amended in 2007) provides the legal framework for the treatment and care of individuals with mental health conditions. This Act sets out the safeguards and procedures for the detention, treatment, and care of individuals with mental disorders.

Primus PLUS Healthcare ensures compliance with this Act by:

- Providing mental health training to staff to ensure they can support individuals with mental health needs in a way that is respectful and compliant with the Mental Health Act.
- Ensuring that all staff working with individuals with mental health needs are aware of their rights under the Act and the appropriate procedures to follow when providing care.

6. The Autism Act 2009

The Autism Act 2009 is the first piece of UK legislation specifically aimed at improving services and support for people with autism. It requires local authorities and healthcare providers to ensure that services are tailored to meet the needs of individuals with autism.

- Specialized Training for Staff: To ensure compliance with the Autism Act, Primus PLUS Healthcare provides specialized training for staff working with individuals with autism

spectrum conditions (ASC), ensuring they understand how to meet the needs of this group and provide effective, person-centred care.

7. The Care Act 2014

The Care Act 2014 provides the legal framework for adult social care in England, ensuring that people with care and support needs are provided with high-quality, person-centred care.

- **Person-Centred Care:** Our recruitment process ensures that we employ staff who are trained to provide person-centred care, a key principle of the Care Act 2014. We ensure that our staff are capable of delivering care that respects the individuality, rights, and preferences of service users.
- **Workforce Development:** We ensure that our workforce development aligns with the Care Act by providing ongoing training and support to ensure staff remain competent and qualified to meet the needs of adults with learning disabilities, mental health needs, and autism spectrum conditions.

8. The Children and Families Act 2014

While Primus PLUS Healthcare focuses on supported living without personal care, we also recognize the relevance of this Act in guiding recruitment practices for those supporting young adults with complex needs.

- **Support for Transitioning Young Adults:** Staff are trained to support young adults transitioning into adulthood, ensuring that their needs are met in a holistic and person-centred manner, in compliance with the Children and Families Act 2014.

9. Local Authority Requirements and Safeguarding Boards

In addition to national legislation, we adhere to the requirements set out by local authorities and their local safeguarding boards. We work closely with local agencies to ensure compliance with local regulations and provide services that reflect the community's needs.

- **Collaboration with Local Safeguarding Boards:** Primus PLUS Healthcare works closely with local safeguarding boards to ensure that our recruitment practices align with local safeguarding policies and contribute to a multi-agency approach to protecting vulnerable adults.

10. Regulatory Compliance Monitoring

To ensure ongoing regulatory compliance, Primus PLUS Healthcare implements the following monitoring procedures:

- **Regular audits of recruitment practices and compliance with regulatory standards.**
- **Staff performance reviews to ensure they adhere to safeguarding policies and relevant legislation.**
- **Feedback mechanisms for candidates and employees to identify areas of improvement in recruitment and training processes.**

13. REVIEW AND MONITORING

At Primus PLUS Healthcare, we are committed to ensuring that our recruitment policies and procedures are continually reviewed, refined, and aligned with evolving CQC regulations, UK legislation, and best practice guidelines. Regular review and monitoring help us maintain the effectiveness and fairness of our recruitment process, ensuring that we consistently attract, hire, and retain qualified individuals who are best suited to provide high-quality, person-centred care to adults with learning disabilities, mental health needs, and autism spectrum conditions (ASC) in supported living services without personal care.

This section outlines the procedures for reviewing and monitoring our recruitment policy to ensure compliance, identify areas for improvement, and demonstrate our commitment to continuous improvement in recruitment practices.

1. Review of Recruitment Policy and Procedures

Our Recruitment Policy and Procedure will be reviewed annually to ensure it remains compliant with current CQC regulations, UK legislation, and the needs of Primus PLUS Healthcare and the individuals we support.

Key Areas of Review:

- **Compliance with Regulatory Changes:** The policy will be reviewed and updated to reflect any changes in relevant regulations and legislation, such as updates to the Care Quality Commission (CQC) guidelines, Equality Act 2010, and Data Protection Act 2018.
- **Effectiveness of Recruitment Practices:** We will assess whether the recruitment process is effectively attracting suitable candidates and ensuring that only qualified and fit and proper persons are employed in line with Regulation 19 of the Health and Social Care Act 2008.
- **Feedback from Applicants and Employees:** Feedback from applicants and newly hired staff will be collected to evaluate the fairness, inclusivity, and accessibility of the recruitment process. This will help us identify any potential barriers to participation, especially for candidates with learning disabilities, mental health needs, or autism.
- **Diversity and Inclusion:** The policy will be reviewed to assess whether it is successfully promoting diversity and inclusion in the workforce, in line with the Equality Act 2010 and best practices for hiring individuals from underrepresented groups.

2. Monitoring Recruitment Performance

To ensure the recruitment process is meeting the desired standards, we will implement the following monitoring activities:

Key Performance Indicators (KPIs):

- **Time to Hire:** Tracking the average time it takes from the advertisement of a vacancy to the hiring of a candidate. This will help assess the efficiency of the recruitment process.
- **Candidate Diversity:** Monitoring the diversity of candidates at different stages of the recruitment process, including the number of applicants from diverse backgrounds, candidates with disabilities, and those with experience in supporting individuals with learning disabilities, mental health conditions, and autism.

- **Retention Rates:** Tracking the retention rate of new hires to assess the effectiveness of our recruitment process in selecting individuals who are well-suited to the role and the service user group. This will also include monitoring employee satisfaction and engagement through surveys and regular check-ins.
- **DBS Compliance:** Monitoring the percentage of staff who successfully complete DBS checks and ensuring there are no gaps in compliance.
- **Equality and Diversity Metrics:** Regularly assessing whether we are achieving our equality and diversity goals, ensuring that recruitment outcomes are representative of the local community, especially in terms of age, disability, race, gender, and other protected characteristics.

Recruitment Audit:

- We will conduct regular internal audits of the recruitment process to ensure that it adheres to CQC guidelines, Equality Act 2010, and UK GDPR. These audits will evaluate the fairness of the recruitment process, the consistency of decision-making, and the effectiveness of our checks and controls, such as DBS checks, reference checks, and right to work verification.
- Any findings from the audits will be used to identify areas for improvement and will be communicated to senior management.

3. Employee Feedback and Continuous Improvement

We recognize that continuous improvement in our recruitment practices is essential for attracting and retaining the best talent. Therefore, feedback will be actively sought from both new employees and applicants to identify areas where improvements can be made.

Feedback Collection:

- **Post-Hire Surveys:** New employees will be asked to complete a survey during their probationary period, providing feedback on their experience of the recruitment and onboarding process.
- **Applicant Feedback:** All applicants, including those who were unsuccessful, will be invited to provide feedback on their experience of the recruitment process. This feedback will be used to identify any potential issues with the recruitment process and to make improvements where necessary.

Action on Feedback:

- All feedback will be reviewed by the HR Department and Recruitment Team to ensure that concerns or suggestions for improvement are addressed. We will take action where necessary, ensuring that any issues identified are resolved in a timely and efficient manner.

4. Monitoring Compliance with Safeguarding and Regulatory Requirements

Safeguarding is integral to the recruitment process at Primus PLUS Healthcare. We will ensure ongoing compliance with the Safeguarding Vulnerable Groups Act 2006, DBS requirements, and other CQC standards related to recruitment.

- **Regular Safeguarding Audits:** Our recruitment processes, including background checks and safeguarding procedures, will be reviewed periodically as part of the CQC compliance audits.

- **Annual Staff Reviews:** During annual staff appraisals, we will assess whether staff are consistently adhering to safeguarding standards in their roles and whether any additional training or support is required to maintain high standards of care.
- **Incident Reporting and Learning:** Any incidents related to recruitment, such as failure to carry out required checks or the identification of safeguarding risks, will be reported, investigated, and acted upon. Lessons learned will be incorporated into the recruitment process.

5. Documentation and Record-Keeping

To maintain transparency and accountability in the recruitment process, Primus PLUS Healthcare will keep detailed records of all recruitment activities. These records will be regularly reviewed and monitored to ensure compliance with legal and regulatory requirements.

Key Records to Be Kept:

- **Recruitment Files:** Documentation for each applicant, including the application form, interview notes, references, DBS checks, and other relevant documentation.
- **Compliance Records:** Evidence of compliance with CQC regulations, Equality Act 2010, DBS requirements, and UK GDPR for each recruitment process.
- **Feedback and Audit Records:** Records of feedback received from candidates and any actions taken in response to feedback or audit findings.

6. External Reviews and Benchmarking

To ensure that our recruitment practices remain up to date and compliant with best practices, we will engage in external reviews and benchmarking against industry standards. We will periodically:

- Consult with external auditors or CQC inspectors to review our recruitment processes and ensure they meet the highest standards.
- Benchmark our recruitment practices against those of similar organizations in the healthcare sector, ensuring that we remain competitive and compliant.

7. Reporting to Senior Management

The HR Department will report regularly to senior management on the effectiveness of the recruitment process and any areas for improvement. This will include:

- Audit results.
- Feedback summaries.
- Diversity and compliance data.

Senior management will review this information and make decisions about any changes or improvements that need to be implemented.

14. RECRUITMENT OF VOLUNTEERS AND APPRENTICES (IF APPLICABLE)

At Primus PLUS Healthcare, we recognize the significant value that volunteers and apprentices bring to our services. They provide essential support to our care teams and contribute to the high-quality,

person-centred care we offer to adults with learning disabilities, mental health needs, and autism spectrum conditions (ASC) in our supported living services without personal care.

This section outlines our approach to recruiting volunteers and apprentices, ensuring that we comply with CQC regulations, UK legislation, and best practice standards in safeguarding, equality, and data protection.

1. Recruitment of Volunteers

Volunteers play a crucial role in supporting the delivery of care services, offering additional resources, and enriching the lives of our service users. To ensure that Primus PLUS Healthcare maintains the highest standards of care and safeguarding, we adhere to the following recruitment procedures for volunteers.

Key Elements of Volunteer Recruitment:

- **Eligibility and Role Suitability:**
 - Volunteers are recruited to support the work of the care team in a way that complements and enhances the care of service users.
 - All volunteers must be fit and proper persons to be involved in providing care and interacting with vulnerable individuals, in line with Regulation 19: Fit and Proper Persons Employed of the Health and Social Care Act 2008.
- **Application Process:**
 - Volunteers must complete an application form, which includes questions about their background, experience, and motivation to work with vulnerable adults.
 - Volunteers will also be asked to provide references from previous volunteer or employment experiences, particularly in healthcare, education, or with vulnerable groups.
- **Disclosure and Barring Service (DBS) Check:**
 - All volunteers will undergo an Enhanced DBS check to ensure they are not barred from working with vulnerable adults. This is in accordance with the Safeguarding Vulnerable Groups Act 2006.
- **Interview and Assessment:**
 - Volunteers will be invited to attend an interview with the recruitment team to assess their suitability for the role. The interview will assess their understanding of person-centred care, safeguarding, and their ability to work with individuals with learning disabilities, mental health needs, and autism.
 - A formal induction and appropriate safeguarding training will be provided to volunteers before they begin their roles.
- **Training and Supervision:**
 - Volunteers will receive initial training and ongoing supervision to ensure they are equipped to support care teams and meet the needs of service users.
 - They will be subject to the same safeguarding protocols and training requirements as staff members to ensure the safety and well-being of service users.

- **Safeguarding and Complaints:**
 - Volunteers are required to follow safeguarding procedures and report any concerns regarding the welfare of service users.
 - A complaints procedure will be in place for volunteers to raise concerns or issues about their role or the recruitment process, ensuring transparency and accountability.

2. Recruitment of Apprentices

Apprenticeships provide valuable training and career development opportunities for individuals wishing to pursue a career in health and social care. At Primus PLUS Healthcare, we recognize the importance of offering apprenticeships to individuals who are passionate about providing care and support to adults with learning disabilities, mental health needs, and autism.

Key Elements of Apprenticeship Recruitment:

- **Eligibility and Role Suitability:**
 - Apprentices will be recruited to provide support in various areas of supported living services without personal care, ensuring that they are equipped to meet the needs of our service users.
 - All apprentices must meet the basic eligibility criteria and be suitable for working with vulnerable adults in line with CQC standards.
- **Application Process:**
 - Apprentices will be required to submit a detailed application form outlining their previous experience, qualifications, and reasons for pursuing a career in health and social care.
 - Apprentices will also submit references from previous employers, educational institutions, or voluntary organizations, demonstrating their suitability for the role.
- **Disclosure and Barring Service (DBS) Check:**
 - Apprentices will undergo an Enhanced DBS check as part of the recruitment process, ensuring they meet the standards for working with vulnerable individuals.
- **Interview and Selection:**
 - Apprentices will be invited to attend an interview to assess their understanding of the role, their motivation for working in care, and their potential to provide quality support to service users with learning disabilities, mental health needs, and autism.
- **Apprenticeship Training Program:**
 - Once recruited, apprentices will undertake a structured apprenticeship training program that includes both practical and theoretical components. The training will cover key aspects of person-centred care, safeguarding, and working with vulnerable adults.
 - Apprentices will be supervised and mentored by qualified staff who will provide guidance, feedback, and support throughout their training period.
- **Safeguarding and Supervision:**

- Apprentices will undergo safeguarding training and will work under supervision in all aspects of their role. They will be encouraged to report any safeguarding concerns in line with our safeguarding procedures.
- Compliance with Legislation:
 - Primus PLUS Healthcare will ensure that apprenticeship programs comply with National Apprenticeship Standards and that apprentices receive appropriate training in line with industry standards and CQC guidelines.

3. Compliance with Relevant Legislation

The recruitment of volunteers and apprentices will be conducted in full compliance with the following UK legislation and regulations:

- CQC Regulation 19: Fit and Proper Persons Employed: Ensuring that all volunteers and apprentices meet the standards for working with vulnerable adults.
- Equality Act 2010: Ensuring non-discriminatory recruitment practices for all volunteers and apprentices, including providing reasonable adjustments for candidates with disabilities.
- UK GDPR and Data Protection Act 2018: Ensuring that personal data collected during the recruitment process is handled in accordance with data protection laws.
- The Safeguarding Vulnerable Groups Act 2006: Ensuring that all volunteers and apprentices undergo DBS checks to ensure they are suitable to work with vulnerable adults.

4. Monitoring and Evaluation of Volunteers and Apprentices

To ensure the effectiveness and fairness of our volunteer and apprenticeship programs, Primus PLUS Healthcare will implement the following monitoring and evaluation procedures:

- Performance Reviews: Volunteers and apprentices will undergo regular performance reviews and feedback sessions to assess their progress and provide support for their development.
- Supervision: Regular supervision will be provided to ensure that volunteers and apprentices are adhering to safeguarding protocols and providing high-quality care to service users.
- Feedback: Feedback from volunteers, apprentices, and the care teams will be collected periodically to assess the effectiveness of the program and identify any areas for improvement.
- Continuous Improvement: Based on feedback and monitoring data, we will continuously improve our recruitment, training, and supervision processes to ensure the success of our volunteer and apprenticeship programs.

15. APPROACH TO RECRUITING OVERSEAS WORKERS

At Primus PLUS Healthcare, we value the diversity and skills that overseas workers bring to our organization, particularly in the context of providing high-quality care to adults with learning disabilities, mental health needs, and autism spectrum conditions (ASC). We are committed to ensuring that our recruitment practices for overseas workers are fair, inclusive, and fully compliant with all CQC regulations, UK immigration laws, and relevant legislation. This section outlines the

approach we take when recruiting overseas workers and the steps we take to ensure that all legal, regulatory, and safeguarding requirements are met.

1. Legal and Regulatory Compliance

To ensure compliance with CQC regulations, UK immigration law, and relevant UK legislation, Primus PLUS Healthcare follows strict procedures when recruiting overseas workers. This includes adhering to the Immigration, Asylum and Nationality Act 2006, which governs the employment of overseas workers, and ensuring that the recruitment process aligns with the Equality Act 2010, UK GDPR, and Data Protection Act 2018.

Key Legal Frameworks:

- CQC Regulation 19: Fit and Proper Persons Employed: We ensure that all overseas workers meet the requirements set out in Regulation 19 of the Health and Social Care Act 2008. This includes ensuring that they are fit and proper to work in care settings with vulnerable adults.
- UK Immigration Law: We comply with the Immigration, Asylum and Nationality Act 2006, ensuring that all overseas workers have the right to work in the UK before they are offered employment.
- Equality Act 2010: We ensure that the recruitment process is non-discriminatory and that overseas workers are given the same opportunities as domestic candidates, without any form of discrimination based on their nationality or ethnicity.
- UK GDPR and Data Protection Act 2018: We adhere to data protection laws, ensuring that personal information gathered during the recruitment process is handled appropriately and securely.

2. Eligibility to Work in the UK

A critical step in recruiting overseas workers is ensuring they have the legal right to work in the UK. Primus PLUS Healthcare ensures compliance with UK immigration laws by thoroughly checking the eligibility of all overseas applicants before an offer of employment is made.

Key Eligibility Checks:

- Right to Work Documentation:
 - All overseas workers must provide valid documentation confirming their right to work in the UK. This includes documents such as a valid work visa, residency permit, or proof of settled status under the EU Settlement Scheme.
 - We will verify these documents through the Home Office Employer Checking Service if necessary.
- Visa and Immigration Compliance:
 - For those requiring a visa to work in the UK, Primus PLUS Healthcare ensures compliance with the UK Visas and Immigration (UKVI) guidelines by verifying the appropriate sponsorship licence and ensuring that the visa is valid for the role in question.
 - Overseas workers requiring sponsorship will be required to provide a Certificate of Sponsorship issued by Primus PLUS Healthcare, if applicable, and the company must ensure that the worker meets the requirements set out by the Home Office.

3. Recruitment Process for Overseas Workers

Our recruitment process for overseas workers follows the same steps as for domestic candidates, but with additional checks to ensure compliance with immigration regulations and the Equality Act 2010.

Key Stages in Recruitment:

- **Advertisement and Application:**
 - We advertise job vacancies through both local and international channels to attract a diverse range of applicants. These channels include national job boards, specialized healthcare recruitment sites, and international recruitment fairs.
 - The recruitment process is designed to ensure that all candidates, including those from overseas, are assessed fairly based on their skills, qualifications, and experience. No discriminatory language or practices are used in any job advertisements.
- **Shortlisting and Interview:**
 - All applicants are shortlisted based on their qualifications and experience, with overseas workers considered equally for roles based on merit.
 - Interviews are conducted with a focus on the candidate's suitability for the role, their understanding of the needs of service users with learning disabilities, mental health conditions, and autism, and their ability to work within a person-centred care framework.
- **Identity and Eligibility Checks:**
 - We verify the identity of all overseas candidates and ensure their eligibility to work in the UK through the required right to work checks.
 - DBS checks and references will be completed in the same manner as for domestic candidates, ensuring that overseas workers meet the same safeguarding and employment standards.
- **Offer of Employment:**
 - If a candidate is successfully selected, an offer of employment will be contingent upon the successful completion of all eligibility checks, including visa validation, DBS checks, and reference verification.

4. Ensuring Cultural and Legal Compliance

We recognize the potential challenges overseas workers may face when relocating to the UK. To support them, we ensure that the recruitment and on boarding processes are inclusive and sensitive to cultural differences.

Cultural Competence:

- We provide cultural competency training for all new overseas recruits, ensuring they understand UK healthcare standards, cultural expectations, and how to effectively engage with diverse service user groups, including those with learning disabilities, mental health conditions, and autism.
- We also provide support in understanding UK workplace norms and communication practices to ease their transition into a new working environment.

Training on UK Regulations and Safeguarding:

- All overseas workers will undergo mandatory training on UK safeguarding regulations, including the Care Act 2014 and Mental Health Act 1983, to ensure they understand the rights and protections afforded to vulnerable adults in the UK.
- They will also be trained on the CQC regulations that govern the care sector, ensuring they provide services in compliance with national standards.

5. Providing Support to Overseas Workers

Supporting overseas workers throughout their employment is essential to their success in their roles at Primus PLUS Healthcare.

Relocation Support:

- Primus PLUS Healthcare offers practical relocation assistance for overseas workers, which may include support with finding accommodation, settling into the UK, and navigating local public services.

Mentorship and Integration:

- Overseas workers will be paired with a mentor or buddy who is familiar with the UK healthcare system and can provide ongoing support during their transition.
- We also offer regular check-ins with the HR team to ensure overseas workers are settling into their roles and have access to any additional resources or support they may need.

6. Ongoing Monitoring and Compliance

To ensure that overseas workers continue to meet all legal and regulatory requirements throughout their employment, Primus PLUS Healthcare implements the following monitoring practices:

- **Visa Monitoring:** HR will monitor visa expiry dates and ensure that visa renewals are completed on time, preventing any issues related to the employee's eligibility to work in the UK.
- **Ongoing Safeguarding:** Overseas workers will continue to undergo regular DBS checks, and supervision and performance reviews will assess their ability to maintain compliance with safeguarding protocols.
- **Feedback:** Overseas workers will be encouraged to provide feedback on their recruitment and on boarding experience, as well as any challenges they face during their employment, to help improve the process for future recruits.

7. Supporting Compliance with Immigration Laws

Primus PLUS Healthcare is committed to adhering to UKVI guidelines and maintaining a sponsorship license to hire overseas workers where applicable. This includes ensuring:

- Proper documentation for each overseas worker's visa status and right to work.
- Record-keeping of immigration status for auditing purposes and compliance with UK immigration regulations.

16. EMPLOYMENT HISTORY AND REFERENCES

At Primus PLUS Healthcare, we understand the importance of verifying a candidate's employment history and obtaining references during the recruitment process. This is critical in ensuring that individuals hired to provide care and support to adults with learning disabilities, mental health needs, and autism spectrum conditions (ASC) are fit and proper persons to work with vulnerable adults.

This section outlines the procedures we follow to verify employment history and obtain references, ensuring compliance with CQC regulations, UK legislation, and best practice standards.

1. Employment History Verification

To ensure that candidates have the required experience and qualifications for the role, Primus PLUS Healthcare carefully reviews their employment history as part of the recruitment process. This helps to confirm that the candidate has the relevant skills, experience, and background to work in supported living services without personal care.

Key Steps in Employment History Verification:

- Request for Detailed Employment History:
 - All applicants must provide a detailed employment history, including all relevant work experience in healthcare or social care settings, especially where they have worked with vulnerable adults, learning disabilities, mental health needs, or autism.
 - This employment history must include job titles, dates of employment, responsibilities, and reason for leaving each position.
- Gaps in Employment:
 - Candidates are required to explain any gaps in employment over the past 5 years (or longer, if relevant). We will request additional information to clarify these gaps and determine if the candidate has had any relevant personal or professional experiences that may not have been part of formal employment.
- Verification of Employment:
 - We will verify employment history by contacting the candidate's previous employers (particularly those in health and social care settings) to confirm details such as job titles, dates of employment, and reasons for leaving.
 - We will pay special attention to any employment that involved working with vulnerable individuals, ensuring that the candidate has the necessary experience to support service users effectively.
- Reviewing Past Employment in Health and Social Care:
 - If a candidate has worked in the healthcare or social care sector, we will pay particular attention to the relevance of their experience. This includes looking for evidence of experience in person-centred care, understanding safeguarding, and addressing the specific needs of people with learning disabilities, mental health needs, and autism.

2. Obtaining References

References are a key component in verifying a candidate's suitability for a role. Primus PLUS Healthcare requires that all candidates provide at least two professional references—one of which must be from their most recent employer, ideally from a healthcare or social care setting.

Key Guidelines for References:

- Reference Requirements:
 - References must come from individuals who have direct knowledge of the candidate's work experience, especially in a health and social care context. This can include previous supervisors, line managers, or colleagues who have worked with the candidate in a care-related role.
 - We require that one of the references be from the candidate's most recent employer, preferably someone who can speak to the candidate's ability to work with vulnerable adults.
- Contacting Previous Employers:
 - For each candidate, we will contact at least two references to verify:
 - Job title and role: To confirm the candidate's previous responsibilities and alignment with the requirements of the position they are applying for.
 - Dates of employment: To confirm the length of time the candidate worked in their previous positions.
 - Reason for leaving: To understand the circumstances under which the candidate left their previous role and whether there were any issues related to their employment, such as performance, safeguarding concerns, or disciplinary actions.
- Safeguarding Considerations:
 - When obtaining references, particular care will be taken to ensure that there are no safeguarding concerns in the candidate's previous employment. If there are any concerns related to abuse, neglect, or failure to meet care standards, these will be carefully reviewed and may impact the recruitment decision.
- Verifying Professional Conduct:
 - We will ask references to provide feedback on the candidate's professional conduct, including their ability to provide person-centred care, their commitment to safeguarding, and their overall performance in a care role.
- Inability to Provide References:
 - If a candidate is unable to provide references from previous employers (e.g., due to a gap in employment or if they are a new graduate), they may provide alternative references. These could include references from voluntary work, internships, or educational institutions, which demonstrate relevant skills, values, and potential for success in a care role.

3. Additional Considerations for International Applicants

For overseas workers or individuals who have worked outside the UK, additional checks will be conducted to verify employment history and references.

Steps for International Applicants:

- Foreign Employment Verification:
 - If the applicant has worked abroad, we will work with third-party services or local employers to verify their employment history. This may include contacting international employers, institutions, or using international reference-checking services.
- International DBS Checks:
 - In addition to the UK DBS check, we will assess the need for obtaining an international police check or background check to ensure that candidates who have worked abroad do not have any criminal history that could affect their suitability to work in the UK.
- Verification of Overseas Qualifications:
 - If the candidate has international qualifications or certifications, we will verify these with the relevant professional bodies or regulatory authorities to ensure they are valid and meet UK standards for working in the healthcare sector.

4. Compliance with Relevant Legislation

The verification of employment history and the collection of references are conducted in compliance with relevant UK legislation, including:

- CQC Regulation 19: Fit and Proper Persons Employed: We ensure that all candidates meet the CQC standards by thoroughly checking their employment history and obtaining relevant references to confirm they are suitable to work with vulnerable adults.
- The Equality Act 2010: We ensure that our approach to verifying employment history and collecting references is non-discriminatory, treating all candidates fairly regardless of their background or personal characteristics.
- UK GDPR and the Data Protection Act 2018: All personal data, including employment history and references, is handled in compliance with UK GDPR and the Data Protection Act 2018. This includes obtaining explicit consent from candidates for the collection and processing of their personal information during the recruitment process.
- Safeguarding Vulnerable Groups Act 2006: We ensure that DBS checks and reference checks comply with the Safeguarding Vulnerable Groups Act 2006, ensuring that no individual with a criminal history that disqualifies them from working with vulnerable adults is hired.

5. Record Keeping and Documentation

To ensure transparency and compliance, Primus PLUS Healthcare will maintain comprehensive records of all employment history checks and reference verifications for each candidate. This documentation will be stored securely and reviewed periodically to ensure compliance with CQC standards and relevant data protection regulations.

17. RECRUITMENT DATA PROTECTION AND CONFIDENTIALITY (UK GDPR)

At Primus PLUS Healthcare, we are committed to protecting the personal data of all candidates throughout the recruitment process. We recognize the importance of confidentiality and data protection in ensuring that candidates' rights are respected, and that recruitment processes comply with UK GDPR, the Data Protection Act 2018, and CQC regulations. This section outlines our approach to ensuring data protection and confidentiality during the recruitment process, particularly with regard to the handling of sensitive data related to adults with learning disabilities, mental health needs, and autism spectrum conditions (ASC), as well as the broader requirements of supported living without personal care services.

1. Compliance with UK GDPR and the Data Protection Act 2018

Primus PLUS Healthcare fully complies with the General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, which govern the processing, storage, and sharing of personal data in the UK. Our recruitment policy ensures that:

- Personal data is handled lawfully, fairly, and transparently throughout the recruitment process.
- Candidates' rights are respected, including their right to access, correct, or delete their personal data.
- Data is processed for specified, legitimate purposes and is not used in a way that is incompatible with those purposes.

Key Principles of Data Protection:

- **Lawful, Fair, and Transparent Processing:** We ensure that the collection, use, and storage of candidate data is lawful, fair, and transparent. Candidates are informed about how their data will be used during the recruitment process, and they provide explicit consent for its collection and processing.
- **Data Minimization:** We collect only the data necessary for recruitment purposes. This includes essential information such as personal details, work experience, and references, as well as sensitive data, such as disability status, if required to ensure compliance with Equality Act 2010 or to provide reasonable adjustments during the recruitment process.
- **Accuracy:** We take reasonable steps to ensure that personal data is accurate and kept up-to-date. If a candidate's details change during the recruitment process, they are encouraged to inform us immediately so we can update our records.
- **Storage Limitation:** Personal data is kept for no longer than necessary. Once a recruitment process is complete, personal data is retained for a set period to comply with legal or regulatory requirements (e.g., for audit purposes). When it is no longer needed, data will be securely deleted.
- **Integrity and Confidentiality:** We implement appropriate technical and organizational measures to ensure the confidentiality, integrity, and security of personal data. This includes protecting data from unauthorized access, disclosure, or loss.

2. Data Collection and Processing in Recruitment

At Primus PLUS Healthcare, we collect and process various types of data throughout the recruitment process, including personal details, qualifications, work experience, references, and, where relevant, data about a candidate's health or disability status.

Types of Data Collected:

- **Personal Identifiable Information (PII):** This includes name, address, phone number, email address, and date of birth.
- **Work Experience:** Data on previous employment, roles held, employment dates, and professional references.
- **Educational Background:** Details of academic qualifications, professional certifications, and training completed.
- **Health and Disability Data:** We may collect sensitive data (e.g., disability status) when candidates request reasonable adjustments during the recruitment process. This information is collected only with the candidate's explicit consent and is handled with care to ensure privacy and compliance with the Equality Act 2010.

Processing Data:

- **Candidate Consent:** Before we collect any data, candidates will be asked to provide explicit consent for us to process their personal data as part of the recruitment process.
- **Purpose Limitation:** We process candidate data solely for the purpose of evaluating their suitability for employment, as well as to comply with legal and regulatory obligations (e.g., to perform DBS checks or to verify eligibility to work in the UK).

3. Confidentiality during the Recruitment Process

Confidentiality is essential throughout the recruitment process, and Primus PLUS Healthcare ensures that all personal and sensitive data is handled with the utmost care.

Confidentiality Measures:

- **Restricted Access to Data:** Personal data is only accessible to those involved in the recruitment process, including HR staff, hiring managers, and others involved in decision-making. We ensure that these individuals are aware of their responsibilities to keep candidate data confidential.
- **Secure Storage:** All physical and digital records containing personal data are securely stored. Digital records are kept in encrypted databases with restricted access, and paper records are stored in locked, secure locations.
- **Non-Disclosure:** All staff involved in recruitment are required to sign confidentiality agreements to ensure that candidate data is not disclosed without appropriate consent.

4. Data Subject Rights

Under UK GDPR, candidates have a number of rights regarding their personal data. Primus PLUS Healthcare ensures that candidates are informed of their rights and are supported to exercise them where applicable.

Key Rights:

- **Right to Access:** Candidates have the right to request access to their personal data that we hold. This allows them to verify the accuracy of the data and understand how it is being used.
- **Right to Rectification:** If a candidate believes that the personal data we hold is inaccurate or incomplete, they have the right to request corrections.
- **Right to Erasure:** Candidates may request that we delete their personal data, provided there are no legal or contractual reasons for retaining it.
- **Right to Restrict Processing:** Candidates may request that we limit the processing of their personal data under certain circumstances.
- **Right to Object:** Candidates have the right to object to the processing of their data for direct marketing or processing that is based on legitimate interests.

To support candidates in exercising these rights, we provide clear contact information for our Data Protection Officer (DPO), who will address any queries or requests related to data protection.

5. Sharing Personal Data

In some instances, we may need to share personal data collected during the recruitment process with third parties. We ensure that such sharing complies with UK GDPR and that data is shared securely.

Circumstances Where Data May Be Shared:

- **Disclosure and Barring Service (DBS):** We may share personal data with the DBS to conduct criminal background checks as part of the recruitment process.
- **Immigration and Sponsorship Authorities:** We may need to share data with UK Visas and Immigration (UKVI) for sponsorship purposes or to verify the right to work in the UK for overseas workers.
- **Professional Regulatory Bodies:** We may share data with professional bodies to verify qualifications or check that individuals are registered with relevant authorities (e.g., NHS, Social Care Council).

In all instances, we ensure that the sharing of data is necessary, proportional, and secure. Data shared with third parties will be done in accordance with data protection principles and any contracts in place with these third parties will ensure they handle data in compliance with UK GDPR.

6. Data Retention

Primus PLUS Healthcare will retain personal data for as long as necessary to fulfil the purposes for which it was collected, including compliance with legal and regulatory obligations. Once data is no longer needed for the recruitment process, it will be securely deleted.

Retention Periods:

- **For Successful Candidates:** Personal data is retained for the duration of the candidate's employment and for a reasonable period thereafter for compliance with legal obligations (e.g., employment records, tax compliance).
- **For Unsuccessful Candidates:** Personal data is retained for up to 12 months after the completion of the recruitment process. After this period, data will be securely destroyed, unless the candidate has requested their data to be kept for future opportunities.

7. Monitoring and Audit

To ensure ongoing compliance with UK GDPR and data protection laws, we regularly audit our recruitment data protection practices. This includes:

- Regular reviews of data access permissions.
- Periodic audits of data retention and deletion practices.
- Staff training on data protection and confidentiality.

18. RECRUITMENT FOR SPECIALIST SERVICES (AUTISM AND LEARNING DISABILITIES)

At Primus PLUS Healthcare, we are committed to ensuring that our recruitment processes reflect the unique needs of individuals with learning disabilities, autism spectrum conditions (ASC), and mental health needs. Our recruitment policy for specialist services emphasizes the importance of hiring staff who are trained and competent in supporting individuals with these specific needs. We adhere to CQC regulations, relevant UK legislation, and best practice standards to ensure that our recruitment process results in hiring individuals who can provide high-quality, person-centred care in our supported living services without personal care.

This section outlines our approach to recruiting staff for specialist services, ensuring that they are fully equipped to meet the needs of adults with learning disabilities, autism, and mental health needs, in line with regulatory requirements.

1. Specialist Recruitment Focus: Autism and Learning Disabilities

The recruitment of staff who work with individuals with autism spectrum conditions (ASC) and learning disabilities requires specific attention to the skills and qualities needed to provide effective support. At Primus PLUS Healthcare, we prioritize the recruitment of staff who possess not only the technical expertise but also the personal attributes required to work with this group of service users.

Key Competencies for Specialists:

- **Knowledge of Autism and Learning Disabilities:** All candidates should have a strong understanding of autism spectrum conditions, learning disabilities, and how these conditions impact the lives of service users. This knowledge ensures that the recruitment process selects individuals who can provide appropriate support, focusing on individualised care and supporting independence.
- **Communication Skills:** Effective communication is crucial when supporting individuals with ASC or learning disabilities. Candidates must demonstrate their ability to communicate clearly and appropriately, using both verbal and non-verbal techniques, including Makaton, sign language, or visual aids where necessary.
- **Patience and Empathy:** Staff must possess a high degree of patience and empathy, as well as a compassionate approach to working with individuals who may have complex needs and behavioural challenges.
- **Person-Centred Approach:** A person-centred approach is essential for working with adults with learning disabilities and autism. Candidates should demonstrate their ability to understand each service user's individual needs, preferences, and support requirements.

2. Recruitment Process for Specialist Roles

Our recruitment process for specialist roles involves several key stages to ensure that candidates possess the necessary skills and experience to support individuals with autism and learning disabilities.

Stages of the Recruitment Process:

1. Advertising Specialist Roles:

- Vacancies for specialist roles will be advertised through relevant platforms, including autism-specific job boards, healthcare recruitment websites, and local services that support individuals with learning disabilities.
- We will ensure that job advertisements clearly state the specific requirements of the role, including experience in working with autistic individuals and people with learning disabilities.

2. Application and Shortlisting:

- Candidates applying for specialist roles will need to demonstrate specific experience in providing support to individuals with learning disabilities, autism, or mental health needs. This will be assessed through application forms and CVs.
- Shortlisting will focus on candidates with experience in specialist care, training in autism or learning disability care, and a demonstrated commitment to providing high-quality person-centred care.

3. Interview Process:

- Interviews will assess the candidate's knowledge of autism, learning disabilities, and mental health conditions, and their ability to apply this knowledge in practical settings.
- Questions will be designed to assess candidates' experience in managing specific challenges, such as communication difficulties, sensory sensitivities, and challenging behaviours, and their ability to support individuals with complex needs.
- Where appropriate, role-playing exercises or practical scenarios may be used during the interview to assess how candidates would respond to situations commonly encountered when supporting people with learning disabilities or autism.

4. Specialist Skills Testing:

- Depending on the role, candidates may be required to complete assessments or tests designed to assess their knowledge of autism-specific techniques or learning disability support strategies. These assessments will ensure that the candidate has the necessary skills to provide effective support.

5. Reference Checks:

- We will obtain at least two references for each candidate, ensuring that at least one of these references is from a previous role where the candidate worked with individuals with learning disabilities, mental health conditions, or autism.
- References will be checked to ensure that the candidate's previous roles and duties are aligned with the expectations of the role they are applying for at Primus PLUS Healthcare.

6. DBS Checks:

- As part of the recruitment process, Enhanced DBS checks will be conducted to ensure that candidates do not have a history that would make them unsuitable for working with vulnerable adults. This is a mandatory part of the recruitment process for all roles at Primus PLUS Healthcare.

3. Training and Development for Specialist Roles

Once recruited, staff working with individuals with autism or learning disabilities will undergo comprehensive training to ensure they are fully equipped to provide high-quality care. This includes:

Mandatory Specialist Training:

- **Autism Awareness:** Training on the autism spectrum and how to support individuals with autism spectrum conditions effectively. This training will include understanding sensory processing difficulties, communication barriers, and behavioural support strategies.
- **Learning Disabilities Training:** Comprehensive training on supporting individuals with learning disabilities, including challenging behaviours, supporting independence, and promoting inclusion in the community.
- **Mental Health Awareness:** Training for staff on how to support individuals with mental health needs, ensuring they can address any co-occurring conditions in a holistic and supportive manner.

Ongoing Professional Development:

- Staff will have access to continuing professional development (CPD) opportunities, including attending specialist workshops, autism training courses, and learning disability conferences to ensure that their skills and knowledge remain up-to-date.
- Supervision and regular performance reviews will assess each employee's development and identify any further training or support they may need.

4. Safeguarding and Compliance

The recruitment process for staff working with autistic individuals and those with learning disabilities is particularly sensitive to safeguarding needs. Primus PLUS Healthcare ensures compliance with CQC safeguarding standards and national safeguarding policies to protect vulnerable adults from harm.

Key Safeguarding Measures:

- **DBS Checks:** Comprehensive DBS checks are required for all staff to ensure that no one with a history of abuse or neglect is employed to work with vulnerable individuals.
- **Supervision and Support:** New staff members will be closely supervised and will receive ongoing support to ensure they are delivering care that meets safeguarding requirements.
- **Safeguarding Training:** Staff will receive mandatory safeguarding training as part of their induction, focusing on how to recognize and report abuse or neglect.

5. Recruitment for Specialist Services and Inclusivity

We ensure that our recruitment process is inclusive and accessible to individuals from diverse backgrounds, including those with disabilities, mental health conditions, and autism. This means:

- We provide reasonable adjustments during the recruitment process for candidates who need them, ensuring that individuals with learning disabilities or autism can fully participate.
- We promote equality and diversity by ensuring that all candidates are treated fairly, regardless of their background or status, and are assessed on their ability and competence to meet the needs of service users.

6. Monitoring and Evaluation of Recruitment Practices for Specialist Roles

We continuously evaluate the effectiveness of our recruitment practices for specialist roles to ensure that we attract, hire, and retain individuals with the right skills, experience, and qualifications to support adults with learning disabilities, mental health needs, and autism.

Monitoring:

- We track the diversity and experience of applicants for specialist roles to ensure that we are reaching a broad range of candidates.
- Feedback from new recruits, hiring managers, and service users will be gathered to assess the effectiveness of our recruitment process.

19. RECRUITMENT FOR TEMPORARY OR AGENCY STAFF

At Primus PLUS Healthcare, we recognize the value of temporary and agency staff in supporting the delivery of care services to adults with learning disabilities, mental health needs, and autism spectrum conditions (ASC), particularly in situations where additional staff are needed to meet the demands of the service. However, it is critical that temporary or agency staff meet the same high standards of care and safety as permanent employees.

This section outlines our approach to recruiting temporary or agency staff and the procedures in place to ensure their suitability, in line with CQC regulations, UK legislation, and best practices for supporting individuals with complex care needs.

1. Compliance with Legal and Regulatory Frameworks

Our recruitment policy for temporary and agency staff ensures compliance with all relevant regulations and legislation, including:

- CQC Regulation 19: Fit and Proper Persons Employed: We ensure that temporary and agency staff meet the same criteria as permanent staff to ensure they are fit and proper persons to work with vulnerable adults.
- The Equality Act 2010: Our recruitment process for temporary or agency staff ensures non-discriminatory practices. We ensure that temporary staffing decisions are based on merit, experience, and qualifications, and that no candidate is unfairly excluded based on protected characteristics such as disability, age, or gender.
- UK GDPR and the Data Protection Act 2018: We handle the personal data of temporary and agency staff in compliance with the UK GDPR and the Data Protection Act 2018 to ensure their privacy and confidentiality are respected during the recruitment process.

- The Health and Social Care Act 2008: As part of ensuring quality care standards, our temporary and agency staff are required to meet the same standards as permanent employees, particularly in supported living services without personal care.

2. Recruitment Process for Temporary or Agency Staff

We ensure that temporary and agency staff are selected with the same care and diligence as permanent employees. The recruitment process for temporary or agency workers involves the following key steps:

Key Stages in the Recruitment Process:

1. Agency Selection:
 - Primus PLUS Healthcare works with reputable recruitment agencies that specialize in healthcare and social care staffing. We ensure that the agencies we partner with adhere to the same regulatory standards as we do, including compliance with CQC regulations, safeguarding policies, and training requirements.
 - Agencies must provide evidence that their candidates have undergone DBS checks, right to work verification, and appropriate qualifications before placement.
2. Adherence to Job Descriptions and Person Specifications:
 - Job descriptions and person specifications for temporary or agency staff will clearly outline the necessary skills, qualifications, and experience required to work with adults with learning disabilities, mental health needs, and autism spectrum conditions (ASC).
 - All candidates must meet these criteria and demonstrate the ability to deliver person-centred care.
3. Screening and Shortlisting:
 - We ensure that temporary or agency workers are screened in the same way as permanent staff, focusing on their experience in supported living services and their ability to meet the specific needs of service users with learning disabilities or autism.
 - Temporary staff are also assessed on their previous healthcare experience, particularly with vulnerable adults and individuals with complex needs.
4. Interviewing and Skills Assessment:
 - Where possible, agency staff are interviewed to assess their suitability for the role. Interviews will evaluate their ability to work effectively with adults with learning disabilities, mental health needs, and autism.
 - Practical assessments may be used to assess skills in areas such as safeguarding, communication, and person-centred care.
5. Disclosure and Barring Service (DBS) Check:
 - All temporary or agency staff must undergo an Enhanced DBS check as part of the recruitment process. This ensures that candidates are not barred from working with vulnerable adults and are fit and proper to work in care settings, in accordance with Regulation 19 of the Health and Social Care Act 2008.
6. References:

- We require references from previous employers, particularly those within the healthcare or social care sector, to verify the suitability of temporary and agency workers. These references must confirm the worker's experience, conduct, and suitability to work with vulnerable individuals.

7. Training Requirements:

- Temporary and agency staff will receive mandatory training covering safeguarding, health and safety, infection control, and person-centred care to ensure they are equipped to meet the needs of service users.
- If necessary, specialist training in autism care or learning disability support will be provided to ensure that temporary workers have the necessary skills and knowledge.

3. Safeguarding and Supervision

Given the vulnerable nature of the individuals we care for, temporary and agency staff must adhere to the same safeguarding standards as permanent staff. To ensure service user safety and care quality, the following measures are taken:

Key Safeguarding Measures:

- Induction and Supervision:
 - All temporary and agency workers will undergo a full induction covering key safeguarding practices and policies. They will be supervised and supported by senior care staff to ensure that they follow appropriate protocols when supporting individuals with learning disabilities and autism.
- Continuous Monitoring:
 - The performance and behaviour of temporary or agency staff will be monitored closely, with regular feedback provided. Supervision and periodic checks will ensure that they remain compliant with CQC regulations and safeguarding standards.
- Reporting Concerns:
 - All staff, including temporary and agency workers, are required to report any concerns regarding the safety or well-being of service users. Primus PLUS Healthcare has robust whistleblowing and incident reporting procedures in place to ensure that any issues are addressed promptly and effectively.

4. Integration and Support

Temporary and agency workers must be integrated into the team quickly and effectively, ensuring they are equipped to meet the needs of service users and can provide high-quality care.

Support for Temporary Workers:

- Induction and Orientation: Temporary workers are given a thorough induction to the service, including familiarizing them with care plans, safeguarding protocols, and service user needs.
- Mentorship and Supervision: Temporary and agency workers will be paired with experienced staff members who provide guidance and support as they integrate into the service. This ensures that they understand the specific needs of service users and can adapt their approach to delivering care effectively.

- Feedback Mechanism: Temporary staff will be encouraged to provide feedback on their experience of working at Primus PLUS Healthcare. This feedback will be used to continually improve the recruitment and integration process for temporary or agency workers.

5. Compliance with Relevant Legislation

All recruitment procedures for temporary and agency workers at Primus PLUS Healthcare comply with the relevant UK legislation, including:

- CQC Regulation 19: Fit and Proper Persons Employed: Ensuring that temporary and agency staff are fit and proper to work with vulnerable adults by conducting DBS checks, obtaining references, and verifying their qualifications and experience.
- The Equality Act 2010: We ensure that the recruitment process for temporary or agency staff is non-discriminatory, ensuring equal opportunities regardless of gender, age, disability, or other protected characteristics.
- UK GDPR and Data Protection Act 2018: All personal data collected during the recruitment process for temporary or agency staff is processed in accordance with UK GDPR and the Data Protection Act 2018 to ensure confidentiality, security, and the protection of candidates' rights.

6. Record Keeping

We maintain detailed records of all temporary or agency staff recruitment activities, including:

- Job advertisements
- Candidate applications
- Reference checks
- DBS check results
- Training and induction records

These records are securely stored and managed in compliance with UK GDPR and the Data Protection Act 2018.

20. RECRUITMENT MONITORING AND EVALUATION

At Primus PLUS Healthcare, we recognize that monitoring and evaluating the recruitment process is essential to ensuring that we consistently recruit qualified, capable, and committed staff who can provide high-quality care for adults with learning disabilities, mental health needs, and autism spectrum conditions (ASC). Our approach to recruitment monitoring and evaluation ensures that we continuously improve our recruitment practices, meet CQC regulations, and comply with UK legislation.

This section outlines the procedures for monitoring and evaluating our recruitment processes to maintain fairness, inclusivity, and compliance with all relevant standards.

1. Purpose of Recruitment Monitoring and Evaluation

The purpose of recruitment monitoring and evaluation at Primus PLUS Healthcare is to:

- Ensure compliance with CQC regulations (particularly Regulation 19: Fit and Proper Persons Employed), UK legislation, and best practice guidelines.
- Continuously assess the effectiveness of our recruitment processes in attracting diverse and qualified candidates.
- Identify areas for improvement to ensure a fair, inclusive, and transparent recruitment process for all candidates, particularly those applying for roles involving the care of vulnerable adults with learning disabilities, mental health conditions, and autism.
- Improve staff retention and ensure that recruited staff are well-supported and capable of delivering high-quality care.

2. Key Areas of Recruitment Monitoring

The recruitment monitoring process at Primus PLUS Healthcare focuses on several key aspects of the recruitment process to ensure its effectiveness and fairness:

a. Equality and Diversity Monitoring:

We actively monitor the diversity of applicants to ensure that our recruitment practices are inclusive and promote equality. This includes monitoring:

- Gender, age, ethnicity, and other protected characteristics as defined under the Equality Act 2010.
- Accessibility of the recruitment process for individuals with disabilities or special needs (e.g., providing reasonable adjustments for candidates with learning disabilities or autism).
- The proportion of underrepresented groups applying for and being successfully recruited to roles.

This data is collected confidentially and used to identify any barriers to recruitment or discrimination, ensuring that all candidates are given equal opportunities.

b. Compliance with Legal and Regulatory Requirements:

We regularly audit our recruitment processes to ensure that we comply with all relevant CQC regulations and UK legislation, including:

- CQC Regulation 19 (Fit and Proper Persons Employed), ensuring that all staff are suitable and qualified to work with vulnerable adults.
- UK GDPR and Data Protection Act 2018 compliance, ensuring personal data is collected, stored, and processed securely.
- Compliance with DBS check requirements and right to work checks, particularly for overseas workers.

Any non-compliance or gaps identified during audits will be addressed immediately, and corrective actions will be taken.

c. Recruitment Process Efficiency:

We monitor the efficiency of the recruitment process to ensure that it is streamlined, effective, and timely. Key performance indicators (KPIs) include:

- Time-to-hire: Tracking the time from when a vacancy is posted to when a candidate is hired, to ensure we are filling positions promptly to meet service needs.
- Cost-per-hire: Monitoring the cost associated with each hire, including advertising, agency fees, and recruitment software, to ensure budget efficiency.

3. Recruitment Evaluation

Primus PLUS Healthcare conducts regular evaluations of the recruitment process to assess its success in attracting and retaining the right candidates. This evaluation includes both quantitative and qualitative feedback from various stakeholders involved in the recruitment process.

a. Stakeholder Feedback:

Feedback is gathered from:

- Hiring Managers: To assess how well candidates align with the job description, person specification, and the needs of service users. This helps us determine if the recruitment process is selecting candidates who have the right skills and experience.
- New Hires: Through on boarding feedback and induction surveys, we gather insights on the recruitment experience from newly hired staff, including ease of application, clarity of job descriptions, and overall satisfaction with the recruitment process.
- Recruitment Agencies (if applicable): We evaluate the performance of recruitment agencies by assessing the quality of candidates they provide, ensuring they align with our standards and expectations.

b. Post-Hire Performance Monitoring:

Once staff members are hired, we track their performance and retention:

- Retention rates: Monitoring whether temporary, agency, and permanent staff stay with the organization for extended periods.
- Performance reviews: Regular performance evaluations and supervision sessions ensure that new hires are meeting performance expectations and delivering quality care.

Any staff turnover or poor performance feedback is reviewed to identify potential issues with the recruitment process and to make necessary adjustments.

4. Data Collection and Reporting

To ensure transparency and accountability, we collect and analyse data at various stages of the recruitment process. This includes:

- Application data: Information on the number and diversity of applicants for each role.
- Shortlisting and interview data: Data on the number of shortlisted candidates, interview outcomes, and selection criteria.
- Recruitment outcomes: Monitoring the success rate of candidates who are hired versus those who drop out or fail to meet the required criteria.

This data is compiled into regular reports for senior management, highlighting trends, areas for improvement, and action plans.

5. Continuous Improvement

As part of our commitment to continuous improvement, Primus PLUS Healthcare uses the data collected from recruitment monitoring and evaluation to implement the following actions:

- Training and development: Addressing any gaps identified in recruitment-related training for staff involved in hiring.
- Improving candidate experience: Based on feedback from candidates and hiring managers, we will streamline the recruitment process to make it more user-friendly, inclusive, and efficient.
- Updating policies and procedures: Ensuring that our recruitment policies remain aligned with CQC regulations, UK legislation, and best practices.

6. Recruitment Audits

We conduct regular audits of the recruitment process to ensure compliance and effectiveness. These audits include:

- Internal audits: Conducted by our HR team to ensure that recruitment procedures align with our policies, CQC standards, and legal requirements.
- External audits (if necessary): Engaging third-party auditors to review our recruitment practices, particularly to assess compliance with UK GDPR and CQC regulations.

7. Reporting and Action Plans

Based on the findings of recruitment monitoring and evaluation, we compile quarterly reports detailing:

- Recruitment success rates: The percentage of vacancies filled successfully within the desired time frame.
- Diversity metrics: The diversity of candidates hired, ensuring we are meeting our inclusion goals.
- Areas for improvement: Action plans to address any identified gaps in the recruitment process, including strategies to reduce time-to-hire, improve candidate experience, and enhance staff retention.

These reports are shared with senior management and used to refine and improve our recruitment policies and procedures.

8. Continuous Engagement with Recruitment Partners

If applicable, Primus PLUS Healthcare works closely with recruitment agencies and other external recruitment partners to ensure they meet our standards for sourcing candidates. Regular evaluations of these partnerships help us maintain a high-quality pipeline of candidates.

21. PROHIBITION ON EMPLOYING INDIVIDUALS WITH SERIOUS CRIMINAL RECORDS

At Primus PLUS Healthcare, we are committed to providing a safe and supportive environment for all our service users, particularly those with learning disabilities, mental health needs, and autism spectrum conditions (ASC). In line with this commitment, we adhere to strict policies regarding the

employment of individuals with criminal records, ensuring that we comply with CQC regulations and relevant UK legislation.

The prohibition on employing individuals with serious criminal records is a critical part of our recruitment policy, as it ensures the safety and well-being of the vulnerable individuals in our care. This section outlines our approach to safeguarding service users by ensuring that individuals with serious criminal histories are not employed in positions where they may have access to vulnerable adults.

1. Legal and Regulatory Compliance

We ensure full compliance with the following legal frameworks and regulations regarding the employment of individuals with criminal records:

- CQC Regulation 19: Fit and Proper Persons Employed: Under Regulation 19 of the Health and Social Care Act 2008, it is a requirement that all employees are "fit and proper" to work in a care setting. This includes ensuring that individuals with serious criminal records, particularly those involving abuse, neglect, or other safeguarding concerns, are not employed in roles where they have access to vulnerable adults.
- The Safeguarding Vulnerable Groups Act 2006: This act governs the Disclosure and Barring Service (DBS) system and ensures that individuals with serious criminal records, particularly those with convictions for abuse or neglect, are barred from working with vulnerable groups, including adults with learning disabilities and mental health conditions.
- Equality Act 2010: While this act ensures equal opportunities for all candidates, it also permits employers to exclude candidates from employment if they pose a potential risk to vulnerable individuals, particularly in sectors such as health and social care.
- UK GDPR and the Data Protection Act 2018: We ensure that all data regarding criminal records is handled and processed in compliance with UK GDPR and the Data Protection Act 2018, maintaining confidentiality and using this information only for lawful and necessary purposes.

2. Recruitment Process and Screening for Criminal Records

As part of our commitment to safeguarding vulnerable adults, all candidates applying for roles at Primus PLUS Healthcare undergo thorough checks to assess their suitability for working with individuals with learning disabilities, mental health needs, and autism spectrum conditions (ASC).

Key Steps in the Screening Process:

1. Enhanced DBS Check:
 - As part of the recruitment process, all candidates undergo an Enhanced Disclosure and Barring Service (DBS) check. This includes a thorough background check to identify whether the candidate has any criminal convictions, cautions, warnings, or reprimands, including those that may be relevant to the role.
 - Primus PLUS Healthcare ensures that the DBS check also includes a check against the barred list, ensuring that the candidate is not prohibited from working with vulnerable adults.
2. Assessment of Criminal Records:

- In cases where an applicant has a criminal record, the recruitment team will assess the nature of the offence and the relevance of the conviction to the specific role. This assessment will consider factors such as:
 - The type of offence committed.
 - The time elapsed since the conviction.
 - Whether the offence directly impacts the ability to work with vulnerable adults (e.g., offences involving abuse, violence, or neglect).
 - The individual's rehabilitation efforts and evidence of good character since the conviction.
3. Self-Disclosure:
- All applicants are required to self-disclose any criminal convictions as part of the application process, even if the conviction is considered spent under the Rehabilitation of Offenders Act 1974.
 - We recognize that rehabilitation and second chances are important, but we ensure that individuals with certain serious offences are excluded from working with vulnerable service users in compliance with CQC guidelines and safeguarding regulations.
4. Risk Assessment and Decision-Making:
- If a candidate's DBS check or self-disclosure reveals a criminal record, a thorough risk assessment will be conducted to determine whether the individual is suitable for the role.
 - Primus PLUS Healthcare will make decisions on a case-by-case basis, considering the nature of the offence, the length of time since the offence, the candidate's rehabilitation, and their role within the organization.

3. Prohibition on Employment in Certain Circumstances

There are certain criminal convictions that automatically prohibit an individual from working in supported living services for vulnerable adults, including those with learning disabilities, mental health conditions, or autism spectrum conditions.

Categories of Prohibited Offences:

- Abuse or Neglect: Any convictions related to abuse or neglect of vulnerable adults or children are strictly disqualifying for employment in roles that involve direct care or supervision of vulnerable individuals.
- Violent Offences: Convictions for violent crimes, including assault, domestic violence, or other forms of violence, will result in automatic exclusion from consideration for care roles.
- Sexual Offences: Any convictions for sexual offences, including sexual assault, sexual exploitation, or any related crimes, are disqualifying.
- Drug-Related Offences: Serious convictions related to drug trafficking or drug-related crimes may also disqualify a candidate, depending on the nature of the offence and its relevance to the role.

- Financial Crimes: In certain roles, particularly those involving the management of service users' finances, fraud or theft convictions may disqualify a candidate.

4. Ongoing Monitoring and Compliance

To ensure ongoing compliance with CQC regulations and safeguarding standards, Primus PLUS Healthcare conducts regular checks and audits to ensure that DBS and criminal record assessments remain up to date.

Key Ongoing Monitoring Measures:

- Periodic Re-checks: For staff working with vulnerable adults, periodic DBS re-checks are conducted to ensure that no new disqualifying offences have occurred.
- Continuous Safeguarding Monitoring: Safeguarding training and supervision ensure that staff continue to uphold high standards of care, and any incidents of inappropriate behaviour or concerns about suitability are addressed promptly.

5. Safeguarding and Staff Conduct

In addition to criminal record checks, Primus PLUS Healthcare has a robust safeguarding policy in place to ensure that all staff, including those with prior criminal records, adhere to the highest ethical standards when providing care to vulnerable individuals.

Key Safeguarding Practices:

- Training: All staff, including those with previous criminal records, will undergo mandatory safeguarding training as part of their induction. This training covers the prevention, identification, and reporting of abuse, neglect, and exploitation.
- Supervision and Monitoring: Ongoing supervision and regular performance reviews are used to monitor staff behaviour, particularly for those in high-risk roles, ensuring that safeguarding standards are upheld.
- Whistleblowing Procedure: We maintain a whistleblowing procedure that allows staff to report any concerns about unsafe practices or inappropriate conduct, including concerns related to staff with prior criminal convictions.

6. Record Keeping and Documentation

Primus PLUS Healthcare ensures that all data related to criminal records, DBS checks, and employment suitability assessments are recorded and stored securely, in compliance with UK GDPR and Data Protection Act 2018. Records are maintained for auditing purposes and to ensure that the organization meets its legal obligations regarding the employment of individuals with criminal histories.

22. EQUAL ACCESS TO EMPLOYMENT FOR DISABLED CANDIDATES

At Primus PLUS Healthcare, we are committed to providing equal access to employment opportunities for all candidates, including those with disabilities. We recognize that individuals with disabilities, including those with learning disabilities, mental health needs, and autism spectrum conditions (ASC),

often face barriers in the recruitment process. Our recruitment policy ensures that we follow best practices to remove these barriers and provide a fair, inclusive, and accessible recruitment process for all candidates, in line with CQC regulations, UK legislation, and our commitment to person-centred care.

This section outlines our approach to ensuring equal access to employment for disabled candidates, ensuring that our recruitment process is fully accessible and provides reasonable adjustments for those who require them.

1. Legal and Regulatory Compliance

Primus PLUS Healthcare adheres to the following legal frameworks to ensure that our recruitment practices are inclusive and that disabled candidates are not discriminated against:

- Equality Act 2010: This legislation makes it unlawful to discriminate against a candidate based on disability, including during the recruitment process. We ensure that disabled candidates are given the same opportunities as non-disabled candidates, and we take proactive steps to ensure reasonable adjustments are made where necessary.
- CQC Regulation 19: Fit and Proper Persons Employed: We ensure that our recruitment process is fair, transparent, and compliant with the CQC's requirements for hiring individuals who are fit and proper to work in supported living services. This includes making reasonable adjustments to the recruitment process to ensure that disabled candidates can participate fully.
- The UK GDPR and Data Protection Act 2018: We handle all personal data relating to disabled candidates in compliance with UK GDPR and the Data Protection Act 2018. We ensure that information regarding a candidate's disability is only used for the purpose of providing reasonable adjustments and is stored securely.

2. Ensuring Equal Access to Employment Opportunities

We ensure that disabled candidates have equal access to employment opportunities by providing a recruitment process that is accessible, inclusive, and free from discrimination.

Key Aspects of Our Approach:

1. Accessible Job Advertisements:
 - All job advertisements are written in clear, simple language and are available in a variety of formats (e.g., large print, easy-read versions, audio formats) upon request.
 - Primus PLUS Healthcare ensures that job adverts are placed in accessible and diverse recruitment platforms to reach a wide audience of candidates, including those with disabilities.
 - The advertisement will explicitly state that reasonable adjustments will be provided during the recruitment process to support candidates with disabilities.
2. Inclusive Job Descriptions:
 - Job descriptions and person specifications are designed to reflect the essential skills and qualifications required for the role, without including unnecessary physical or cognitive demands that could exclude disabled candidates.
 - We ensure that job roles are written with a focus on core responsibilities, avoiding any language that could inadvertently discriminate against candidates with disabilities.

3. Reasonable Adjustments During the Recruitment Process:

- Primus PLUS Healthcare recognizes that candidates with disabilities may require reasonable adjustments during the recruitment process. We are committed to providing adjustments to ensure that disabled candidates can fully participate in the application, interview, and selection process.
- Examples of reasonable adjustments include:
 - Providing accessible formats of application forms and job descriptions.
 - Offering adjustments to the interview process, such as extra time, a quiet room, or the presence of an interpreter for candidates with hearing impairments.
 - Assistance with travel or mobility if needed (e.g., assistance getting to an interview or parking near the interview venue).
 - Allowing for flexible interview arrangements such as online video interviews or telephone interviews, if the candidate has mobility or transportation challenges.

4. Ensuring Accessibility of Interview Venues:

- All interview locations for Primus PLUS Healthcare roles are wheelchair accessible and have necessary accommodations for candidates with other mobility impairments.
- If an applicant requires a specific venue or accessibility features, we will make these arrangements in advance.

3. Support for Disabled Candidates during the Recruitment Process

We ensure that disabled candidates are supported throughout the recruitment process by providing a clear pathway for requesting reasonable adjustments.

Key Support Measures:

1. Contact for Assistance:

- We encourage candidates to contact our recruitment team in advance of their application if they require any reasonable adjustments or have accessibility needs. This ensures that candidates can participate in the recruitment process on equal terms.

2. Clear Communication:

- We ensure that candidates are informed that they can request reasonable adjustments and that their requests will be treated confidentially and sensitively.
- Our recruitment team is trained to discuss with candidates the types of adjustments they may need and how we can best support them throughout the recruitment process.

4. Inclusive Interview and Selection Process

Our interview and selection process is designed to be fair, transparent, and accessible for disabled candidates. We ensure that all candidates are assessed solely on their skills, experience, and ability to perform the duties of the role.

Key Features of Our Inclusive Process:

1. Skills-Based Interviewing:

- Interviews are structured around assessing candidates' skills and experience rather than on physical attributes or cognitive capabilities that may not be relevant to the role. This allows disabled candidates to demonstrate their competence effectively.

2. Interview Adjustments:

- If necessary, interview adjustments such as extra time, accessible interview formats, or a more relaxed interview environment will be provided to accommodate candidates' disabilities.
- We are flexible in allowing additional interviews or follow-up questions to ensure all candidates have an equal opportunity to present their qualifications.

5. Training and Awareness

To support disabled candidates in the recruitment process, our recruitment staff and hiring managers receive regular training on disability awareness, reasonable adjustments, and inclusive recruitment practices.

Key Training Areas:

- **Disability Awareness:** Ensuring that hiring managers understand the importance of diversity and inclusion and are aware of the specific needs of disabled candidates.
- **Legal Obligations:** Educating staff about their legal obligations under the Equality Act 2010, ensuring they recognize and respect the right of disabled candidates to fair treatment in the recruitment process.
- **Reasonable Adjustments:** Training staff on how to effectively handle requests for reasonable adjustments and how to implement them in ways that support the candidate's ability to participate fully.

6. Ongoing Evaluation of Recruitment Practices

Primus PLUS Healthcare continuously evaluates the effectiveness of our inclusive recruitment practices and monitors the success of disabled candidates in the recruitment process.

Key Evaluation Measures:

- **Feedback from Candidates:** Gathering feedback from disabled candidates about their experience of the recruitment process, including whether their reasonable adjustment requests were handled appropriately.
- **Success Rates:** Monitoring the success rates of disabled candidates in securing roles, ensuring that there is no disparity in hiring decisions between disabled and non-disabled candidates.
- **Regular Review:** Conducting regular reviews of our recruitment policies and practices to ensure they remain inclusive, accessible, and compliant with evolving CQC regulations and UK disability laws.

7. Data Protection and Confidentiality

We ensure that all personal data related to disabled candidates, including information about their disability, is handled with the utmost care and in compliance with UK GDPR and the Data Protection Act 2018.

Confidentiality:

- Information regarding a candidate's disability will only be used to make reasonable adjustments during the recruitment process and will be kept confidential.
- We do not disclose information about disabilities to hiring managers unless necessary to provide the required reasonable adjustments.

23. JOB ROLE-SPECIFIC QUALIFICATIONS AND COMPETENCY STANDARDS

At Primus PLUS Healthcare, we are committed to ensuring that all staff employed in our supported living services without personal care have the necessary qualifications, skills, and competencies to meet the needs of adults with learning disabilities, mental health needs, and autism spectrum conditions (ASC). This section of our Recruitment Policy and Procedure outlines the job-specific qualifications and competency standards required for each role within the organization to ensure that our recruitment processes align with CQC regulations, relevant UK legislation, and best practice standards.

We aim to recruit staff who are not only qualified but also possess the personal attributes necessary to deliver high-quality, compassionate care. These standards are designed to ensure that our staff are well-equipped to provide person-centred care that promotes the independence, well-being, and safety of the service users we support.

1. Legal and Regulatory Compliance

Our job role-specific qualifications and competency standards are developed to ensure compliance with all relevant legislation and CQC regulations, including:

- CQC Regulation 19: Fit and Proper Persons Employed: We ensure that all staff employed are fit and proper to work with vulnerable adults. This includes verifying that they have the necessary qualifications, training, and experience for the role.
- Health and Social Care Act 2008 (Regulated Activities) Regulations 2014: Our staff meet the competency requirements outlined in the Health and Social Care Act, particularly with regard to safe and effective care.
- The Equality Act 2010: Our recruitment processes and standards ensure that we do not discriminate against individuals with disabilities and that we create an inclusive, accessible working environment for all employees.
- Skills for Care and National Occupational Standards: The competency standards align with Skills for Care frameworks and National Occupational Standards for social care to ensure that staff have the appropriate knowledge, skills, and understanding to work effectively with adults with learning disabilities, mental health needs, and autism.
- The Care Certificate: All new employees must be trained and assessed in the Care Certificate, which sets the standard for the fundamental skills and knowledge needed to provide quality care in the sector.

2. Job Role-Specific Qualifications and Competency Standards

Each role within Primus PLUS Healthcare has specific qualifications and competency standards that must be met to ensure high-quality care and safety for our service users. These requirements are outlined for each role as follows:

a. Support Workers (Including Learning Disabilities, Mental Health, and Autism)

- **Qualifications:**
 - A minimum of Level 2 Diploma in Health and Social Care (or equivalent) is required.
 - Level 3 Diploma in Health and Social Care (or equivalent) is preferred for senior support workers.
 - If the role involves autism support, candidates should have knowledge or training in Autism Spectrum Disorder (ASD) and relevant support strategies.
- **Competency Standards:**
 - Person-centred care: Ability to provide care that is tailored to each individual's needs, preferences, and goals.
 - Safeguarding: Knowledge of safeguarding procedures and the ability to identify and report potential abuse or neglect.
 - Communication skills: Ability to communicate effectively with people with learning disabilities, mental health conditions, and autism.
 - Understanding of mental health and autism: Knowledge of mental health conditions and autism spectrum conditions, including sensory sensitivities, communication challenges, and behavioural management strategies.
 - Medication administration: If applicable, the ability to safely administer medication following training and procedures.

b. Team Leaders/Senior Support Workers

- **Qualifications:**
 - Level 3 Diploma in Health and Social Care (or equivalent) is required. Level 5 Diploma in Leadership for Health and Social Care is preferred for leadership roles.
 - Additional qualifications in autism care, mental health, or learning disabilities are desirable.
- **Competency Standards:**
 - Leadership skills: Ability to lead a team of support workers and provide supervision, guidance, and mentoring.
 - Care planning: Ability to develop, implement, and review care plans for individuals with complex needs.
 - Risk management: Ability to assess and manage risks associated with providing care for individuals with challenging behaviours or complex conditions.

- Supervision and appraisals: Ability to conduct regular supervision and performance appraisals for junior staff.

c. Specialist Roles (e.g., Autism Support Specialists, Mental Health Specialists)

- Qualifications:
 - Specialist training or certification in autism, mental health, or learning disabilities is required (e.g., Autism Accreditation, Mental Health First Aid, or relevant certifications).
 - Level 4 Diploma or specialist qualifications in Autism, Learning Disabilities, or Mental Health are highly desirable.
- Competency Standards:
 - Specialist knowledge: Deep understanding of specific conditions such as autism spectrum disorder, mental health disorders, and learning disabilities.
 - Complex care management: Ability to manage complex care needs and provide tailored interventions for individuals with multiple or co-occurring conditions.
 - Therapeutic support: Ability to deliver therapeutic interventions (e.g., behavioural therapy, sensory support) for individuals with specific needs.

d. Nurses (Where Applicable)

- Qualifications:
 - Registered Nurse (RN) with Nursing and Midwifery Council (NMC) registration is required.
 - Specialisation in learning disabilities, mental health, or autism is preferred.
- Competency Standards:
 - Clinical knowledge: Ability to provide clinical care and manage complex medical needs, ensuring the physical well-being of individuals with learning disabilities, mental health conditions, and autism.
 - Medication management: Knowledge of medication administration and management protocols.
 - Holistic care approach: Ability to assess, plan, and provide care that meets the physical, emotional, and psychological needs of individuals.

e. Managers and Senior Leadership

- Qualifications:
 - Level 5 Diploma in Leadership for Health and Social Care or equivalent management qualifications.
 - CQC Leadership Standards compliance and specialist training in supporting learning disabilities, mental health, or autism are required.
- Competency Standards:

- Leadership and management skills: Ability to lead a team, manage staffing levels, ensure compliance with CQC regulations, and promote high standards of care.
- Strategic planning and service delivery: Ability to assess service needs, set goals, and monitor service outcomes for individuals with learning disabilities, mental health needs, and autism.
- Financial and resource management: Ability to manage budgets, resources, and ensure cost-effective care without compromising quality.
- Safeguarding and compliance: Ability to ensure that safeguarding procedures and regulatory compliance are followed.

3. Ongoing Training and Development

To ensure that staff maintain the required qualifications and competencies, we provide ongoing training and professional development opportunities:

- **Mandatory Training:** All staff are required to complete mandatory training in areas such as safeguarding, person-centred care, mental health awareness, and autism spectrum disorders.
- **Continuous Professional Development (CPD):** We encourage staff to engage in CPD opportunities, including advanced training, specialist courses, and professional qualifications to further develop their skills in supporting adults with learning disabilities, mental health needs, and autism.
- **Supervision and Appraisals:** All staff undergo regular supervision and performance appraisals to assess their competency, identify further training needs, and provide feedback on their professional development.

4. Monitoring and Evaluation of Competency Standards

We regularly evaluate and monitor our job role-specific qualifications and competency standards to ensure that we continue to meet the needs of service users and comply with regulatory standards. This includes:

- **Regular audits:** Conducting audits of staff training records, qualifications, and competency to ensure compliance with internal standards and regulatory requirements.
- **Feedback from service users:** Gathering feedback from service users and their families to assess the quality of care and the effectiveness of staff in meeting individual needs.
- **Ongoing review:** Periodically reviewing the job-specific competencies to ensure they remain relevant and aligned with industry best practices and evolving care standards.

24. EXIT INTERVIEWS AND FEEDBACK FROM NEW EMPLOYEES

At Primus PLUS Healthcare, we are committed to continuously improving our recruitment practices and creating an environment where staff feel valued and supported. As part of this commitment, we implement a structured process for exit interviews and feedback from new employees to understand their experiences, gather insights, and identify opportunities for improvement.

This section outlines our approach to conducting exit interviews and gathering feedback from new employees, ensuring compliance with CQC regulations, relevant UK legislation, and best practices for supported living services without personal care, particularly for adults with learning disabilities, mental health needs, and autism spectrum conditions (ASC).

1. Purpose of Exit Interviews and Feedback

The purpose of exit interviews and feedback from new employees is to:

- Identify areas for improvement in our recruitment and on boarding processes.
- Understand employee experiences to enhance retention, job satisfaction, and overall service quality.
- Gather constructive feedback to improve the support and training we offer to employees, particularly those working with vulnerable individuals.
- Ensure that employees have a voice in helping to shape the workplace culture and environment, promoting inclusive practices and person-centred care.
- Monitor compliance with CQC regulations and ensure that recruitment and staff support practices meet regulatory standards.

2. Exit Interviews for Departing Employees

Exit interviews are conducted for all employees who choose to leave Primus PLUS Healthcare. These interviews are designed to gather feedback on the reasons for their departure, their overall experiences, and any suggestions they may have for improving the working environment. The key components of the exit interview process are as follows:

Key Steps in the Exit Interview Process:

1. Timing of the Exit Interview:
 - The exit interview is typically scheduled before the employee's final day of work. However, flexibility is offered depending on the employee's availability and preference.
2. Confidential and Supportive Environment:
 - Exit interviews are conducted in a confidential and non-judgmental environment, ensuring that departing employees feel comfortable sharing their honest feedback. Employees are informed that their responses will be used to improve working conditions and are not used to assess their personal performance.
3. Interview Questions:
 - Reason for Departure: The interview will explore the employee's reasons for leaving the organization, whether voluntary or involuntary, and identify any issues that may have contributed to their decision.
 - Job Satisfaction: Employees are asked to reflect on their satisfaction with their role, including workload, support, and training received, and the work environment.
 - Support and Development: The interview will cover the employee's experiences with supervision, training, and opportunities for career progression within the company.

- Organizational Culture: Employees are asked for feedback on the overall work culture, including how inclusive, supportive, and person-centred they found the environment to be, particularly when working with vulnerable service users.
- Suggestions for Improvement: Employees are encouraged to provide suggestions on how the organization can improve processes, policies, and working conditions for future staff.

4. Follow-Up Actions:

- Feedback from the exit interview is analysed by HR and management to identify any common themes or recurring issues. If there are concerns related to service user care, staff support, or workplace culture, appropriate actions are taken to address them.

3. Feedback from New Employees

We believe in continuous improvement, and feedback from new employees is crucial in assessing the effectiveness of our recruitment and on boarding processes. We actively seek feedback from all new hires within their first few months of employment to ensure that they are settling into their roles and feel supported in providing high-quality care to adults with learning disabilities, mental health needs, and autism spectrum conditions.

Key Steps in Gathering Feedback from New Employees:

1. Timing of Feedback:

- Feedback is gathered at key points during the new employee's probation period (e.g., after 30, 60, and 90 days). This allows us to understand their experience throughout the early stages of their employment.
- A formal survey or one-on-one interview may be conducted to gather feedback, depending on the employee's preference.

2. Types of Feedback Collected:

- On boarding Experience: New employees are asked to assess their on boarding experience, including the clarity of job expectations, the comprehensiveness of their induction, and the support received during their early days in the role.
- Training and Development: We seek feedback on whether employees feel the training they received was adequate for the role, particularly in areas critical to supported living services, such as safeguarding, mental health support, autism care, and person-centred approaches.
- Support and Supervision: Employees are asked if they feel supported by their managers and supervisors, whether they receive adequate supervision and feedback, and whether they have opportunities for regular discussions about their performance and development.
- Work Environment: New employees are encouraged to provide feedback on the work environment, including their relationship with colleagues, team dynamics, and any challenges they have encountered in delivering care to service users.
- Service User Interaction: Employees are asked to share their experiences in interacting with adults with learning disabilities, mental health needs, and autism spectrum

conditions, and whether they feel adequately prepared to meet the needs of these individuals.

3. Actionable Insights:

- The feedback gathered from new employees is reviewed by HR and senior management to identify any areas where the recruitment, on boarding, or training processes can be improved. This information is crucial for making adjustments to our staff support and development strategies, ensuring that new employees are empowered to succeed in their roles.

4. Confidentiality and Data Protection

Both exit interviews and feedback from new employees are conducted in accordance with UK GDPR and the Data Protection Act 2018, ensuring that all personal data is handled confidentially and securely.

- Confidentiality: Employees are informed that their feedback will be treated as confidential and will be used only for the purposes of improving organizational practices.
- Data Storage: All feedback is stored securely and retained for the appropriate period. Personal data is handled in accordance with data protection regulations, and feedback is used exclusively for organizational improvement.

5. Continuous Improvement

Primus PLUS Healthcare views both exit interviews and feedback from new employees as an essential part of our commitment to continuous improvement in staff recruitment, training, and service delivery. The insights gathered are used to refine our recruitment and induction processes, enhance employee satisfaction, and ensure that we continue to meet the high standards required for supported living services without personal care.

Key Areas of Improvement Based on Feedback:

- Recruitment Process: Adjustments to job descriptions, advertisements, or selection criteria based on feedback regarding recruitment transparency and accessibility.
- On boarding and Induction: Refining the on boarding process to ensure that new employees feel fully prepared and supported in their roles.
- Training and Development: Updating and expanding training programs based on feedback regarding preparedness and support for specific job responsibilities.
- Workplace Culture: Addressing any issues related to team dynamics, communication, or organizational culture that may affect employee satisfaction and retention.

25. USE OF EXTERNAL RECRUITMENT AGENCIES

At Primus PLUS Healthcare, we understand that external recruitment agencies can play a valuable role in supporting our recruitment efforts, particularly in filling hard-to-reach positions or when there is a need for temporary or specialist staff. However, we are committed to ensuring that any external recruitment agencies we partner with align with our standards of care, comply with CQC regulations, and follow relevant UK legislation. This policy outlines how we work with external agencies to recruit

staff for our supported living services without personal care, ensuring that all candidates meet the required qualifications, competency standards, and safeguarding requirements.

1. Legal and Regulatory Compliance

When using external recruitment agencies, we ensure that they comply with all relevant CQC regulations, UK legislation, and our own internal policies for hiring. This ensures that candidates are suitable for the roles they are being recruited for and that the recruitment process aligns with our commitment to high-quality care.

Key Regulations and Legislation:

- CQC Regulation 19: Fit and Proper Persons Employed: External recruitment agencies must ensure that all candidates they provide for employment are fit and proper to work with vulnerable adults, particularly those with learning disabilities, mental health needs, and autism spectrum conditions (ASC). This includes verifying candidates through the necessary checks, including DBS checks, right to work checks, and reference checks.
- Equality Act 2010: External agencies must adhere to the principles of non-discrimination, ensuring that recruitment practices are fair and inclusive, and that they do not unlawfully exclude candidates based on protected characteristics such as disability, age, gender, or ethnicity.
- The Data Protection Act 2018 and UK GDPR: External agencies must ensure that personal data provided by candidates is handled in compliance with UK GDPR and the Data Protection Act 2018. This includes the secure processing of candidate information, ensuring confidentiality, and providing candidates with their data rights.

2. Selection and Approval of External Recruitment Agencies

To ensure that external agencies align with Primus PLUS Healthcare's recruitment standards, we follow a strict process for the selection and approval of agencies.

Agency Selection Criteria:

1. Compliance with CQC Standards: Agencies must demonstrate that they comply with CQC regulations, particularly Regulation 19 on the employment of fit and proper persons, and provide evidence of safeguarding practices.
2. Specialist Knowledge: Agencies must have a proven track record of recruiting staff for roles in the health and social care sector, particularly those working with vulnerable adults with learning disabilities, mental health needs, and autism.
3. Diversity and Inclusion: Agencies must actively promote equal opportunities in recruitment and have a clear policy on diversity and inclusion that aligns with Primus PLUS Healthcare's commitment to inclusive recruitment.
4. References and Feedback: Agencies must provide references from previous clients and demonstrate a strong history of placing high-quality candidates who meet the required qualifications and competency standards.
5. Safeguarding Procedures: Agencies must have robust safeguarding procedures in place to ensure that all candidates undergo appropriate background checks and DBS checks before being placed in roles that involve working with vulnerable individuals.

3. Responsibilities of External Recruitment Agencies

Once an agency has been selected, Primus PLUS Healthcare requires that external agencies adhere to the following responsibilities to ensure the recruitment process is compliant with CQC standards and UK legislation:

Key Responsibilities:

1. Candidate Screening and Checks:
 - DBS Checks: All candidates must undergo an Enhanced Disclosure and Barring Service (DBS) check to ensure they are not barred from working with vulnerable adults. The agency must provide proof of this check before any candidate is placed with Primus PLUS Healthcare.
 - Right to Work Verification: Agencies must ensure that all candidates have the right to work in the UK and provide relevant documentation.
 - References: Agencies must obtain and provide at least two professional references for each candidate, including verification of previous employment history in healthcare or social care settings.
2. Compliance with Job Role-Specific Qualifications and Competencies:
 - Agencies must ensure that candidates meet the job-specific qualifications and competency standards required for the role they are being recruited for. This includes ensuring candidates have the necessary training, skills, and experience to support adults with learning disabilities, mental health needs, and autism.
 - For specialist roles (e.g., autism support or mental health specialists), agencies must ensure candidates have the required specialist qualifications and experience in the relevant areas.
3. Monitoring and Reporting:
 - External agencies must provide regular updates and reports on the recruitment process and candidate progress. This includes any concerns regarding candidate suitability or compliance with Primus PLUS Healthcare's policies.
 - Agencies must notify Primus PLUS Healthcare immediately if any candidate is found to have a disqualifying criminal record, if there are concerns about their suitability to work with vulnerable adults, or if they fail to meet the job role qualifications or competencies.

4. Training and Support for Agency-Recruited Staff

Once candidates are placed through external agencies, Primus PLUS Healthcare ensures that all agency workers receive the necessary induction training and ongoing support to ensure they provide high-quality care to service users.

Training Requirements for Agency Staff:

1. Induction Programme: All agency staff will undergo a thorough induction process, which includes training on the following:
 - Safeguarding Vulnerable Adults

- Person-Centred Care practices
 - Medication Administration (if applicable)
 - Health and Safety in supported living environments
2. Ongoing Training: Agency workers are required to complete mandatory annual training and engage in continuous professional development (CPD) to ensure they remain compliant with current care standards.
 3. Supervision and Appraisals: Agency staff will receive regular supervision and performance appraisals during their placement to assess their competency and address any areas for improvement.

5. Monitoring and Reviewing Agency Performance

Primus PLUS Healthcare actively monitors the performance of external recruitment agencies to ensure they continue to meet our high standards for recruitment and compliance.

Key Monitoring Measures:

1. Regular Performance Reviews:
 - We conduct regular reviews with external agencies to assess the quality of the candidates they provide, the efficiency of the recruitment process, and their adherence to CQC regulations and safeguarding standards.
2. Feedback from Managers and Supervisors:
 - Managers and supervisors are asked to provide feedback on the performance of agency workers, including their competency, reliability, and ability to meet the needs of service users.
3. Agency Audit:
 - Primus PLUS Healthcare conducts annual audits of all external agencies to ensure they remain compliant with our recruitment standards, CQC requirements, and safeguarding protocols.

6. Termination of Agency Agreements

If any external agency is found to be consistently non-compliant with Primus PLUS Healthcare's standards, CQC regulations, or legal requirements, their services may be terminated.

Reasons for Termination:

- Failure to meet compliance standards: This includes failure to ensure candidates meet CQC standards, lack of proper DBS checks, or failure to adhere to safeguarding procedures.
- Persistent poor candidate performance: If the candidates provided by the agency consistently fail to meet the job role qualifications or competency standards, their contract may be terminated.
- Failure to provide adequate support: If the agency does not provide the required supervision or support to its workers, we will review and potentially terminate our agreement with the agency.

26. REVIEW AND AUDIT OF RECRUITMENT PRACTICES

At Primus PLUS Healthcare, we are committed to ensuring that our recruitment practices consistently align with the highest standards of fairness, inclusivity, and compliance with CQC regulations and relevant UK legislation. To achieve this, we implement a comprehensive process for reviewing and auditing our recruitment practices to monitor their effectiveness, identify areas for improvement, and ensure that we continue to meet the needs of both our service users and employees.

This section outlines the steps involved in the review and audit of our recruitment practices, ensuring that we maintain high standards, safeguard vulnerable individuals, and adhere to CQC standards, Equality Act 2010, UK GDPR, and other applicable regulations.

1. Purpose of Review and Audit

The review and audit of our recruitment practices are critical to ensuring that:

- Compliance with all relevant regulations, including CQC, UK employment law, and Data Protection laws (e.g., GDPR and Data Protection Act 2018).
- Fairness and inclusivity are embedded in our recruitment processes, ensuring equal opportunities for disabled candidates, minority groups, and all applicants.
- We consistently attract, hire, and retain high-quality staff to deliver safe, effective care to adults with learning disabilities, mental health needs, and autism spectrum conditions (ASC).
- Continuous improvement is applied to recruitment strategies, ensuring that practices remain current and meet the evolving needs of our services.

2. Frequency of Review and Audit

To ensure that our recruitment practices are consistently effective and compliant, we conduct regular reviews and audits at the following intervals:

- **Annual Review:** A comprehensive review of our entire recruitment process is conducted annually to ensure that we remain aligned with CQC regulations, UK employment law, and best practice guidelines. This review will evaluate the effectiveness of recruitment campaigns, fairness in selection, and the quality of candidates hired.
- **Quarterly Audits:** Every three months, HR and management teams will conduct a focused audit to assess the compliance of recruitment processes with specific standards, such as DBS checks, safeguarding policies, and right to work verification.
- **Ad-Hoc Audits:** Additional audits may be initiated if there are any complaints or concerns raised regarding the recruitment process, or if there are significant changes in CQC regulations, legal requirements, or internal policies.

3. Key Areas of Focus in the Review and Audit Process

The review and audit process will focus on several critical areas to ensure that recruitment practices continue to meet the necessary standards:

a. Compliance with CQC Regulations and Legal Requirements

Our audits will ensure that the recruitment process aligns with CQC Regulation 19 (Fit and Proper Persons Employed), Equality Act 2010, UK GDPR, and other relevant health and social care regulations.

Key checks include:

- **DBS Checks:** Verifying that all candidates, including temporary and agency workers, have passed the Disclosure and Barring Service (DBS) checks and are not barred from working with vulnerable adults.
- **Right to Work:** Ensuring that all candidates have the legal right to work in the UK, with the correct work permits or visa documentation for overseas workers.
- **Employment References:** Confirming that we obtain at least two professional references for all candidates, ensuring that previous employment history is verified, particularly when candidates have worked in health or social care or with vulnerable adults.

b. Fairness and Inclusivity

The audit will assess the recruitment process to ensure it is free from discrimination and bias:

- **Equality of Opportunity:** Reviewing the application and selection process to ensure it adheres to the Equality Act 2010, promoting equal access to employment for candidates from all backgrounds, including those with learning disabilities, mental health needs, and autism.
- **Accessibility:** Ensuring that recruitment materials (e.g., job adverts, application forms) are accessible, and reasonable adjustments are made for disabled candidates or those with special needs.

c. Recruitment Processes and Stages

Each stage of the recruitment process will be audited to ensure that it is conducted in line with best practices and CQC requirements. This includes:

- **Job Advertising:** Assessing whether job advertisements are clear, inclusive, and accessible to a diverse audience.
- **Shortlisting and Interviewing:** Ensuring that candidates are selected based on their qualifications, skills, and experience, rather than any personal characteristics, and that interviews are conducted fairly, with reasonable adjustments made where necessary.
- **Offer and on boarding:** Verifying that new hires are provided with clear, transparent contracts and that induction and on boarding processes are in place to support them in their roles.

d. Recruitment Complaints and Feedback

We will review any complaints or feedback from candidates regarding the recruitment process. This includes:

- **Complaints Resolution:** Ensuring that any complaints made about the recruitment process are investigated promptly, fairly, and resolved effectively.
- **Feedback from New Hires:** Collecting feedback from new employees within their first few months to assess their experience with the recruitment and induction processes.

e. Recruitment of Overseas Workers

If we are recruiting overseas workers, the audit will assess:

- **Compliance with Sponsorship Regulations:** Ensuring that overseas candidates are legally entitled to work in the UK and that we comply with the Home Office regulations for sponsoring workers.
- **Verification of Credentials:** Ensuring that overseas candidates' qualifications and employment history are thoroughly verified, particularly if the candidate has worked in healthcare or social care roles outside of the UK.

4. Continuous Improvement from Reviews and Audits

Primus PLUS Healthcare views the review and audit process as an opportunity to continuously improve our recruitment practices. We use the insights gained from audits and reviews to implement changes that enhance the recruitment experience for both candidates and employees.

Action Steps from Audits and Reviews:

1. **Updating Recruitment Policies:** If audits reveal gaps in compliance or areas for improvement, we will update our recruitment policies to ensure they meet CQC regulations and legal standards.
2. **Improving Candidate Experience:** Based on feedback from candidates and employees, we will refine our recruitment process to make it more inclusive and accessible.
3. **Training and Development:** If audits highlight any gaps in the recruitment team's knowledge or practices, we will implement additional training to ensure staff are up-to-date with CQC regulations and best practices for inclusive recruitment.
4. **Enhanced Safeguarding:** If audits identify concerns around safeguarding checks, we will review our processes to ensure we are rigorously safeguarding service users and employees.

5. Documentation and Reporting

Audit findings will be documented and shared with senior management and HR teams to ensure transparency and accountability. A summary of key findings and actions taken will be provided in an annual report, which will be used to inform ongoing improvements in our recruitment practices.

Reports will include:

- **Audit Results:** A detailed analysis of the audit findings, including areas of compliance and areas requiring improvement.
- **Corrective Actions:** Any actions that have been taken or will be taken to address identified issues.
- **Recommendations for Improvement:** Suggestions for improving the recruitment process to align more closely with CQC regulations and best practices.

27. FORMS

1. Job Application Form

Purpose: To collect essential information from candidates, including personal details, qualifications, employment history, and suitability for the role.

Personal Information

- Full Name: _____
- Address: _____
- Email Address: _____
- Phone Number: _____
- National Insurance Number: _____

Position Applied For: _____

How did you hear about this vacancy? _____

Employment History

(Include most recent employer first)

Employer Name	Job Title	Dates of Employment	Reason for Leaving
_____	_____	_____	_____
_____	_____	_____	_____

Education and Qualifications

Qualification	Institution	Year Completed	Grade
_____	_____	_____	_____
_____	_____	_____	_____

References (2 professional references required)

Name	Job Title	Organization	Email	Phone
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____

Criminal Convictions Declaration

- Have you ever been convicted of a criminal offence? Yes ☐ No ☐
- If yes, please provide details: _____

Right to Work Verification (For Overseas Applicants)

- Do you have the legal right to work in the UK? Yes ☐ No ☐
- If no, please specify the type of visa/work permit: _____

2. Job Interview Checklist

Purpose: Used by interviewers to ensure fairness and consistency during the interview process.

Candidate Information

- Name: _____
- Position Applied For: _____
- Date of Interview: _____
- Interviewer(s) Name(s): _____

Interview Questions

(Use tick boxes and observations)

1. Why do you want to work for Primus PLUS Healthcare?
☐ Clear and compelling answer ☐ Vague or unclear answer
2. How do you ensure person-centred care for individuals with learning disabilities, mental health needs, or autism?
☐ Excellent understanding of care needs ☐ Needs improvement
3. How would you handle a situation where a service user becomes agitated or distressed?
☐ Demonstrated understanding of de-escalation techniques ☐ Lacked awareness or strategy
4. Describe a time when you worked with a challenging service user and how you managed the situation.
☐ Relevant experience ☐ Lacks relevant experience

Technical Skills and Competency

(Tick as applicable)

- Medication administration (if applicable): Yes ☐ No ☐
- Autism awareness (if applicable): Yes ☐ No ☐
- Mental health first aid (if applicable): Yes ☐ No ☐

General Observations

- Communication skills: ☐ Excellent ☐ Good ☐ Needs Improvement
- Teamwork and collaboration: ☐ Excellent ☐ Good ☐ Needs Improvement

Fit and Proper Person Criteria

- Does the candidate meet the necessary qualifications and background checks for this role?
☐ Yes ☐ No

3. DBS Consent Form

Purpose: To give consent for a DBS check for potential employees working with vulnerable individuals.

Personal Information

- Full Name: _____
- Date of Birth: _____
- Address: _____
- National Insurance Number: _____

Consent Statement

I, the undersigned, give my consent for Primus PLUS Healthcare to carry out a DBS check to assess my suitability for employment in a care setting.

I understand that the information disclosed in my DBS check will be handled confidentially and in accordance with UK GDPR and Data Protection Act 2018.

Signature: _____

Date: _____

4. Right to Work Verification Form

Purpose: To confirm that the candidate has the legal right to work in the UK.

Candidate Information

- Full Name: _____
- Position Applied For: _____
- Date of Birth: _____

Documentation Provided

(Tick applicable documents and attach copies)

- ☐ Passport (UK or overseas)
- ☐ EU/EEA National ID Card
- ☐ Biometric Residence Permit (BRP)
- ☐ Work Visa
- ☐ Residence Permit
- ☐ Letter from the Home Office

Checked by

- Name: _____
- Position: _____
- Signature: _____
- Date: _____

5. Offer of Employment Letter

Purpose: To formally offer the position to the successful candidate.

Candidate Information

- Full Name: _____
- Position: _____
- Salary: _____
- Start Date: _____

Terms of Employment

- Full-time/Part-time: _____
- Working Hours: _____
- Probation Period: _____ (e.g., 3 months)
- Salary and Benefits: _____
- Reporting to: _____
- Job Responsibilities: _____

Conditions

This offer is subject to satisfactory DBS checks, Right to Work verification, and employment references.

Signature of Hiring Manager: _____

Signature of Candidate: _____

Date: _____

6. Employee Induction Checklist

Purpose: To ensure new employees complete essential training and orientation.

Employee Information

- Full Name: _____
- Job Title: _____
- Start Date: _____

Induction Training (Tick as completed)

- ☐ Safeguarding Vulnerable Adults
- ☐ Medication Administration (if applicable)
- ☐ Health and Safety
- ☐ Emergency Procedures
- ☐ CQC Regulations and Compliance
- ☐ Person-Centred Care Practices
- ☐ Autism Awareness (if applicable)
- ☐ Mental Health Awareness (if applicable)

Induction Checklist

- Induction completed on: _____
- Signature of Trainer: _____
- Signature of Employee: _____

7. Recruitment Feedback Form

Purpose: To gather feedback from candidates on their recruitment experience.

Candidate Information

- Name (Optional): _____
- Position Applied For: _____

Feedback on the Recruitment Process

1. How clear were the job description and application process?

☐ Very clear ☐ Somewhat clear ☐ Not clear

2. How professional was the interview process?

☐ Very professional ☐ Satisfactory ☐ Unprofessional

3. Were you satisfied with the communication from the recruitment team?

☐ Yes ☐ No (Please provide details) _____

4. How could we improve the recruitment process? _____

Additional Comments: _____

8. Employment References Form

Purpose: To obtain professional references for a candidate to verify their previous employment history.

Candidate Name: _____

Position Applied For: _____

Reference 1

- Name: _____
- Job Title: _____
- Organization: _____
- Contact Information: _____
- Relationship to Candidate: _____
- Reference Comments: _____

Reference 2

- Name: _____
- Job Title: _____
- Organization: _____
- Contact Information: _____
- Relationship to Candidate: _____
- Reference Comments: _____

9. Health and Fitness to Work Form

Purpose: To ensure the candidate is physically and mentally fit to perform the tasks required for their role.

Candidate Information

- Full Name: _____
- Position Applied For: _____
- Date of Birth: _____

Health Information

- Do you have any health conditions that may affect your ability to perform this role? Yes ☐

No ☐

- If yes, please provide details:

Fitness to Work

- Do you feel fit to perform the essential functions of the job (without restrictions)? Yes ☐ No

☐

- If no, please specify any limitations: _____

Signature: _____

Date: _____

10. Conflict of Interest Declaration Form

Purpose: To ensure candidates disclose any potential conflicts of interest that may affect their ability to perform their duties.

Candidate Information

- Full Name: _____
- Position Applied For: _____

Conflict of Interest Declaration

- Do you have any financial interests or relationships with any other organizations or individuals that could conflict with your role at Primus PLUS Healthcare? Yes ☐ No ☐
- If Yes, please provide details: _____

Signature: _____

Date: _____

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