

2.26 RECRUITMENT POLICY

The Company depends on the efficiency and commitment of all employees to deliver a smart, responsive, high quality service. The Company must therefore, attract, recruit and retain a competent and motivated workforce.

The Company must ensure that any person employed by the Company has the right to work in the UK. In so doing the Company aims to ensure that no job applicant, or Employee, is discriminated against either directly or indirectly. All successful candidate's right to work in this country will be confirmed and evidence is required –e.g. sight of an original National insurance card, P60, P45, Visa and/ or Passport.

All employees and job applicants will be treated consistently, and the Company will not discriminate either directly or indirectly on the grounds of race, nationality, ethnic origin, gender, marital status, pregnancy, age, disability, sexual orientation, gender reassignment, and ethnicity, cultural or religious beliefs. Reasonable adjustments to the recruitment process will be made to ensure that no applicant is disadvantaged because of his/her disability.

The Recruitment guidelines incorporate legal requirements and recommend good practice and are designed to support the aims set out in the Equal Opportunities Policy. There will be a consistent approach throughout the Company with aims to:

- Promote a planned, objective approach to employee recruitment.
- Help recruiters to analyse the knowledge and skills required for the position being recruited into
- Help recruiters to assess whether candidates fulfill the requirements.
- Comply with the Company's Equal Opportunities policy

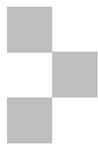
New Posts

In order to create a new post, the following steps must be taken:

- The funding for the full cost of the post must be identified by the line manager, ensuring management costs within prescribed limits are considered.
- The need for the new post must be identified by the line manager and authorised by a Group Board Director for a Salaried Role and the relevant Director for an hourly paid role, using a New Start Approval Form.
- A job description and person specification must be prepared by the line manager prior to the post being advertised.
- Prior to authorisation, the post must be graded with a relevant salary band and appropriate benefits package

Vacant Posts

When an existing post becomes vacant the line manager will determine the need for the continuation of the post. The line manager should consider turnover in the post, and reasons why the post has become vacant. It would be useful for the line manager to scrutinize exit interviews for previous



holders of the post in order to identify factors which may have influenced any decisions to leave the post.

If it is determined the post will continue, the decision to fill the vacancy must be authorised and supported by the Group Board Director or relevant Director (using a New Start Approval Form). The job description and person specification must be amended by the line manager, as appropriate, to reflect current business requirements. If significant changes are proposed, the post must be re-graded by the appropriate process.

Sourcing Candidates

The manager will use his expertise of the role to decide the best method of attracting the right candidate. This may be by internal/external advertisement or via an agency. Where the job is to be advertised, the proposed advertisement must be submitted to HR for approval. An advertisement must not show any intention to discriminate unlawfully and should follow the Company's Equal Opportunities policy.

Agency Guidelines

While we recognise the value of recruitment agencies in connecting us with experienced industry professionals, we remain committed to sourcing staff directly whenever possible.

Where it is appropriate for us to use the services of an agency, that agency will be a preferred supplier with whom we have agreed terms of business. If a Manager instructs a new agency out with the preferred supplier list the terms of business would have to be agreed in advance along with agency fees to ensure a transparent process. Furthermore, we aim to restrict the use of agencies to the recruitment of salaried positions only. All agency costs must be authorised prior to offering any candidates a role and detailed on the New Start Approval Form.

We reserve the right to directly contact any candidate whose details are sent on a speculative basis by a third party without being liable for fees.

The submission of speculative CVs to any member of our staff either directly or via our Careers Page, will be deemed to be an acceptance of this policy.

After 12 weeks in the job agency workers qualify for the same rights as someone employed directly. This is known as 'equal treatment'. Their rights include:

- 'equal pay' - the same pay as a permanent colleague doing the same job
- automatic pension enrolment
- paid annual leave

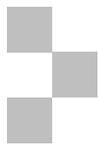
Please be aware of this when utilising agency staff.

Shortlisting Candidates

The manager will use skills and experience as detailed in the job description to compare this against the candidates CV and decide on the shortlist of candidates for interview.

Recruitment Interviews





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The interview will focus on the needs of the job and managers conducting recruitment interviews will ensure that any questions that are asked are not in any way discriminatory and comply with the Company Equal Opportunities policy.

It is against the law to employ a person who does not have permission to live and work in the UK. The Company could be prosecuted and fined for employing an individual who does not have this permission. Therefore candidates will be required to produce evidence of an original document i.e. passport and also evidence of National Insurance number at interview stage.

Employee Vetting

This policy provides a framework which incorporates the advised nationally recommended

safeguarding practices, thereby ensuring that the Company has in place a robust and rigorous recruitment and selection procedure which precludes unsuitable applicants from gaining a position with the Company. We have processes in place to ensure that successful candidates are subject to employee vetting should the nature of their role require it. Employees may be asked to undertake credit checks along with Disclosure/DBS and PVG checks dependent on the role. This is usually determined by the Client/Project or Campaign our employees work on; typically, these will be positions where employees are deemed to have the opportunity for unsupervised contact with children or protected adults as part of their duties connected with their role. For example:

- Children's detention institution
- Children's hospital
- Educational institutions – schools, colleges etc.
- Further education institution
- Hostel used mainly by pupils attending a school or institution
- Children's home

Where a Disclosure/DBS and PVG or request is deemed necessary, individuals will be made aware that the position or work will be subject to the relevant check and that the nature of the position or work entitles us to ask about spent and unspent convictions. All employees are asked to complete a criminal record self-declaration. We will stress to individuals that they should be honest in their response. Employees are also obliged to update HR if any new convictions occur during the course of their employment.

We undertake to discuss any matter revealed in a declaration or certificate issued with the employee of that disclosure before a decision is made regarding their employment which could result in employment offers being withdrawn or termination. No decision will be made without prior consult with HR; each case will be reviewed on an individual basis.

All PVG Scheme Members are subject to ongoing monitoring (continuous updating). This means that when you are a PVG Scheme Member your vetting information is kept up-to-date and if there is new information about you this will be sent to your employer and it will be assessed to determine if you are unsuitable to do regulated work with children and/or protected adults.

Recruitment of Ex-Offenders & Disclosure





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We are committed to equal opportunities and anti-discrimination. No job applicant or member of staff will be subject to less favourable treatment on the grounds of an offending background. We instead actively promote the right mix of talent, skills & potential and welcome applications from a wide range of candidates, including those with criminal records. When recruiting people into roles which specifically require us to request Disclosure of criminal convictions, we will comply with the respective Codes of Practice published in Scotland and England under section 122 of Part V of The Police Act 1997.

Generally, Disclosure will be required for roles which entail people working in places such as schools & healthcare establishments and who subsequently will have unsupervised access to children & other vulnerable groups (Regulated work) or where people may access personal information and/or who undertake certain financial or commercial activities.

When recruiting, we will specifically:

- Have line management and our HR team jointly assess the role to determine whether Disclosure checks are proportionate and relevant to the particular position or type of regulated work or not.
- Where Disclosure is necessary, make overt in any job adverts or recruitment agency notifications that the position or work will be subject to a Criminal Record check and whether we are entitled to ask about spent and/or unspent convictions.
- Treat all individuals fairly and not discriminate unfairly against anyone on the basis of conviction or other information revealed.
- Base the selection of candidates on skills, qualifications and experience.
- Make job offers subject to Disclosure.
- Gather criminal record information (Via the new start forms) from successful job applicants after they have been made a conditional job offer.
- Where offences are disclosed, undertake a risk assessment which considers the job, applicants' abilities, convictions, risk factors and mitigations. The risk assessment will be done jointly by line management and the HR Team and will be recorded on the **D 12.29 Recruitment of Ex-Offenders Risk Assessment** document. If the risk level is not agreed between line management and operations, the matters should be escalated to senior management for their view.
- Undertake the appropriate Criminal Check for the role.
- If new information about criminal convictions is submitted to us via the Disclosure process, review the risk assessment in conjunction with HR and the employee.
- At any stage, if the risk is assessed as being "Intolerable" their employment may be terminated
- Ensure that all those who are involved in the recruitment decision making process have been suitably trained about providing work for ex-offenders, the identification of the need to





request Disclosure information and how to assess the relevance and circumstances of Disclosure information.

- Provide appropriate guidance about providing work for ex-offenders via our **G 12.29 Recruitment of Ex-Offenders Guidance** document.
- If we employ staff in regulated work and they are involved in conduct that harms children or protected adults or places them at risk of harm, make a referral to Disclosure Scotland or Disclosure & Barring Service Records Bureau (DBS) England.

Secure Handling, Use, Storage, Retention and Destruction of Disclosure Information.

Generally we comply with all relevant Data Protection legislation. Specifically we will comply with respective Codes of Practice published in Scotland and England under section 122 of Part V of The Police Act 1997 (“the 1997 Act”) regarding the handling, holding, storage, destruction and retention of disclosure information. Since it is a criminal offence to pass disclosure information to any unauthorised person, we will:

- Use disclosure information only for the purpose for which it was requested and provided and only use Disclosure information in a manner incompatible with that purpose.
- Not share Disclosure information with a third party unless the subject has given their written consent and has been made aware of the purpose of the sharing.
- Ensure that Disclosure information is only shared with those authorised to see it in the course of their duties.
- Not disclose information provided under subsection 113B(5)2 of the 1997 Act, namely information which is not included in the certificate, to the subject.
- Not disclose additional police information or even the existence of such information to the applicant or to any other person unconnected with the recruitment process, even if an offer of employment is to be withdrawn after acting on that information.
- Not keep Disclosure information on an individual's personnel file. It will instead be kept securely, in lockable, non-portable storage containers where access is strictly controlled and is limited to authorised named individuals, who are entitled to see such information in the course of their duties.
- Not keep disclosure information for longer than necessary i.e. either:
 1. The date the relevant decision has been taken plus a reasonable period to allow for the resolution of any disputes or complaints. Or
 2. The date an individual ceases to do regulated work for this organisation.
- Not retain any paper or electronic image of the disclosure information. We will, however, record the date of issue, the individual's name, the disclosure type and the purpose for which it was requested, the unique reference number of the disclosure and details of our decision.





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- Ensure that disclosure information is destroyed in a secure manner i.e. by shredding or pulping.
- Ensure that disclosure information which is awaiting destruction will not be kept in any insecure receptacle (e.g. a waste bin or unlocked desk/cabinet).

Offer of Employment

Once the successful candidate has been selected, HR will prepare the offer of employment for issue to the candidate. An offer may be made verbally to the candidate, but full details of the terms should always be confirmed to the successful candidate in writing by HR.

Probationary Periods

Details of the length of the probationary period will be given in the offer of employment, typically 6 months. This is a trial period for a new employee when the overall skills, performance and conduct will be monitored. The manager should review performance regularly during the probationary period, discussing and recording any issues with the new employee.

Either during or at the end of the probationary period the manager will finally assess the new employee's suitability for the role. If performance is satisfactory then a confirmation of appointment will be advised. If the performance is unsatisfactory then the probationary period may be extended or the employee dismissed. There is no right of appeal against dismissal during probation. The business reserves the right not to apply the Discipline procedure to employees within their probation period.

If the probationary period is extended a letter will be issued confirming the length of the extension and the reasons for the extension.

Other Employment

The Employee must devote the whole of his/her time, attention and abilities during hours of work for the Company to his/her duties for the Company. The Employee may not, under any circumstances, whether directly or indirectly, undertake any other duties of whatever kind during the hours worked for the Company.

The Employee may not, without the prior written consent of the Company (which will not be unreasonably withheld) engage, whether directly or indirectly, in any business or employment which is similar to or in any way connected or competitive with the business of the Company, outside normal working hours for the Company.

The Employee must advise the Company of any other business or employment he/she engages in outside of working hours for the Company.

Relief workers or employees on zero hour's contracts are not subject to the above and there is no obligation to inform your employer of other engaged employment out with the company.

References

All requests for references regarding employment with the Company must be passed to the HR Department. Managers should not be providing verbal or written employee references as this is completed by the HR Department. Breach of this rule may lead to disciplinary action.

