

RECRUITMENT POLICY

IT IS THE RESPONSIBILITY OF ALL USERS OF THIS POLICY TO ENSURE THAT THE CORRECT VERSION IS BEING USED

This Policy has been approved by the undersigned and will be reviewed annually. Any queries or questions in relation to this document please contact the Chief Operating Officer or Chief Executive.

Does this policy meet the requirements of the Equality Act 2010 in relation to age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation?

Yes

Policy reference & version:	CPOL 025 004		
Includes:	Recruitment of Staff in Clinical Roles (Fit and Proper Persons Employed) Recruitment of Employed Staff Recruitment of Contractors, Freelancers and Volunteers Job Applicant Privacy Notice		
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Position:	CEO		
Signature:	J Lambert	Date:	12/08/2020

REVISION HISTORY

Date	Version No	Revised by	Reason for Update Sections Affected Description	Date of next Review
11/08/2022	002	JL	No changes	11/8/23

19/10/2022	003	HH	ADHD and ASD added	19/10/23
02/07/2024	004	HH	New Policy Template & Major Policy review.	02/07/2025
11/02/2025	005	HH	Combined with ECG policy into a single policy across the business.	11/02/2026
13/02/2025	006	CT	Further combined with ECG/Makewell. Revised the title and ensured consistency by setting the font to black and size 12. Included interview expenses and added a bullet point under 'Hiring Manager.' Updated pre-employment checks to apply to all candidates. Streamlined and integrated the Job Applicant Privacy Notice for clarity. Removed numbering.	13/02/2026

PURPOSE

The purpose of this policy is to ensure that ECG/Makewell adhere to best recruitment practices when appointing individuals to both clinical and non-clinical roles. For clinical positions, it ensures compliance with the Fit and Proper Persons Requirements outlined in UK legislation, Care Quality Commission (CQC) guidelines, and other relevant regulations. This policy also ensures that all recruited staff, regardless of their role, meet the necessary standards of competence, conduct, and character to support the delivery of high-quality services.

INTRODUCTION

ECG/Makewell are committed to delivering exceptional healthcare services and training. Central to this commitment is the recruitment of competent, qualified, and compassionate staff for both clinical roles and non-clinical roles that support our services. This policy outlines the procedures and standards for recruiting all staff, ensuring compliance with the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014, specifically Regulation 5: Fit and Proper Persons Employed, where applicable. All vacancies will be advertised internally as well as externally.

SCOPE

This policy applies to all staff, contractors, freelancers and volunteers, hereinafter referred to as staff, working within premises where ECG/Makewell services are provided.

DEFINITIONS

Clinical Roles: Positions that are involved in, or support the delivery of clinical care and regulated healthcare activities. This includes those who do not come into direct contact with service users.

Fit and Proper Persons: Individuals who are of good character, have the necessary qualifications, competence, skills, and experience, and are able to perform the role for which they are employed.

CQC: Care Quality Commission, the independent regulator of health and social care in England.

RQIA: The Regulation and Quality Improvement Authority (RQIA) the independent body responsible for health and social care services in Northern Ireland.

Regulated Activities: Activities defined under the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014.

Practising privileges: The same recruitment procedures within this document will be followed when granting practising privileges to external healthcare professionals

Non-Clinical Roles: Positions that are not involved in the direct delivery of clinical care or regulated healthcare activities. This includes roles that support the organisation's operations, such as administrative, training, or business development functions.

Unregulated Activities: Activities within the organisation that do not fall under the scope of the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014 but are essential for the effective operation of the business, such as healthcare training, support services, and management roles.

RESPONSIBILITIES

Hiring Managers:

- Ensure adherence to this policy during the recruitment process.
- Conduct thorough assessments of candidates' qualifications, experience, and fitness for clinical roles.
- Those leading on recruitment and selection, must be trained in recruitment and selection and be familiar with the relevant policies (i.e. Equal Opportunities statement).

Recruitment Team:

- Oversee the recruitment process to ensure compliance with legal and regulatory requirements.
- Maintain accurate and up-to-date records of all recruitment activities and decisions.
- Ensure all necessary pre-employment checks are completed before making an offer of employment/work.
- Provide training on recruitment policies and procedures to all relevant staff.

All Staff:

- Participate in recruitment activities as required and adhere to this policy.
- Report any concerns about the recruitment process to the Director of Services, Director of Operations or Director of Nursing and Quality.

RECRUITMENT PROCESS

Job Descriptions and Person Specifications:

- Clear and accurate job descriptions and person specifications will be established for all clinical roles, outlining required qualifications, experience, and competencies.
- Job descriptions will be reviewed annually or more frequently if the content of the job changes in the interim.

Advertising Vacancies:

- Vacancies will be advertised widely through a range of channels, including external agencies where appropriate, to attract a diverse and qualified pool of candidates in accordance with best human resource practice.
- Advertisements will be based upon the person specification for the role.
- ECG/ Makewell reserves the right to advertise and arrange pre-employment and recruitment checks using a third-party organisation. Where this happens, ECG/ Makewell will ensure that all employment checks carried out by a third party are complete and satisfactory.

Interview Expenses:

- Individuals invited to attend an interview are responsible for covering their own travel expenses, as it is the Company's policy not to reimburse or contribute towards these costs.
- However, in exceptional circumstances, the Company may, at its absolute discretion, consider providing a contribution towards reasonable travel expenses. Any such contribution is subject to the individual submitting appropriate original receipts as proof of payment. Additionally, individuals must complete and sign an interview expenses claim form to request reimbursement.

Application and Selection:

- All potential applicants who wish to apply for an employed, volunteer or freelance position will be asked to submit an application form and CV.
- Selection of candidates for interview must be decided jointly by the appropriate Line Manager and Director along with clinical specialists where appropriate.
- Recruitment must be solely on the basis of the applicant's abilities, qualifications, experience and merit as measured against the job description and person specification.
- The guidelines in the equal opportunities policy must be followed at all stages of recruitment and selection. Line managers conducting recruitment interviews must make sure that questions asked of job applicants are in no way discriminatory or personally intrusive. The interview should focus on the needs of the post and the skills, qualifications and experience needed to perform it effectively.
- Shortlisting, interviewing and selection must always be carried out without regard to the protected characteristics of sex, civil partnership or married status, sexual orientation, gender reassignment, pregnancy or maternity, race, colour, nationality or ethnic or national origins, religion or belief or age.
- Any applicant who has a disability must not be excluded unless it is clear that the applicant does not meet the minimum criteria outlined in the person specification and they would still fail to do so even if reasonable adjustments were made to work premises or to work provisions, criteria or practices.
- Reasonable adjustments should also be made to the recruitment process to ensure that no applicant is placed at a substantial disadvantage because of their disability. Please note, ECG/Makewell are a Disability Confident Committed Employer, which ensures fairness and equality with recruitment of people with disabilities.
- Where any career time gaps occur in an applicant's employment history, reasons must be verified.
- Where a candidate has previously been employed in a role involving work with children or vulnerable adults, reasonable steps must be taken to verify, as far as practicable, the reasons for the termination of their employment.
- Scenario based questions may be used to give candidates an opportunity to demonstrate their knowledge and previous experience.
- Candidates may also be asked to prepare a relevant presentation or complete a task to demonstrate their competencies.
- It is not ECG/Makewell policy to provide feedback to unsuccessful external candidates, either verbally or in writing, regardless of whether the external candidate was rejected during the initial sifting and shortlisting stage or after interview. However, feedback will be provided where necessary to internal candidates to assist with their personal and career development.

Pre-Employment Checks:

ECG/Makewell will require the following before a formal job offer can be made and a contract issued.

All candidates:

- Proof of identity including a recent photograph.
- Satisfactory Professional References including one from current / most recent employer.
- Documentary evidence of any qualification relevant to the duties for which the person is employed or appointed to perform.
- If the prospective employee has no prior work experience, a reference from a school teacher, higher education lecturer, or further education lecturer will be accepted.
- Candidates must provide documentary proof of their qualifications and eligibility to work in the UK.
- Evidence of right to work in the UK.
- Satisfactory social media or public record checks.
- Where a prospective individual has provided website links on their CV or in their application form to their social media personal website pages, the Company may check these links once an offer is about to be made. Until that stage, however, these links will be disregarded in the recruitment process.
- Any offer of employment or freelance work is conditional upon the satisfactory completion of these checks.
- For freelance roles, there may occasionally be significant delays in this process while we await the necessary documentation. Additionally, these delays may coincide with external factors affecting the project for which we are seeking freelancers. While ECG/Makewell aims to keep freelancers informed of any changes, there may be instances where time constraints prevent us from providing updates as promptly as we would like.
- Before references are contacted, ECG/Makewell will first obtain the prospective employee's or freelancer's consent.

Candidates for Clinical Roles, including non-clinical staff employed in a regulated service:

- An enhanced Disclosure and Barring Service (DBS) check for all candidates to identify any criminal history.
- A full employment history, together with a satisfactory written explanation of any gaps in employment.

- References to include evidence of conduct in previous employment concerned with the provision of services relating to health or social care, or children or vulnerable adults.
- Where a person has been previously employed in a position working with children or vulnerable adults, satisfactory verification, via references so far as reasonably practicable, of the reason why the person's employment in that position ended.
- Confirmation that the candidate is registered with the appropriate professional bodies.
- Via Occupational Health Screening, satisfactory information about any physical or mental health conditions which are relevant to the person's capability, after reasonable adjustments are made, to properly perform tasks which are intrinsic to their employment or appointment for the purposes of the regulated activity.

Good Character Requirements For Clinical Roles:

ECG/Makewell will make every effort to ensure that for each new member of staff, all available information is sought to confirm that the individual is of good character. In relation to this policy, the term 'good character' means:

- not having been convicted of an offence in any country which would be considered an offence in the UK, if the offence relates to the conduct required in carrying on a regulated activity
- not having been removed or struck off a register of professionals maintained by a regulator of healthcare or social work professionals in the UK or any other country, and
- that there is no information about the individual that would suggest they have been responsible for, privy to, contributed to, or facilitated any serious misconduct or mismanagement in the course of carrying on a regulated activity
- If information is later identified that suggests that a member of staff is not of good character, (this may have not originally been available or may have been concealed at the time of application), ECG/Makewell will take immediate action to investigate and address the situation.
- Where ECG/Makewell deems a person is suitable for employment despite the existence of information relevant to issues as set out above, the reasons for appointment to the position should be documented for future reference and made available to those persons or authorities that need to be aware.
- Applicants will be invited to declare if they are, or have been, subject to any investigations or proceedings by any healthcare or social care regulatory body or organisation (or other organisation) within the UK or any other country.
- Applicants will be invited to declare if they have ever been disqualified from professional practice, or subject to practice limitations or restrictions, following a

fitness to practice investigation by any healthcare or social care regulatory body or organisation (or other organisation) within the UK or any other country.

- All relevant regulatory or registering organisations will be contacted by ECG/ Makewell I to confirm a potential applicant's current registration status.

Current /Spent Convictions Or Investigations:

- Applicants will be invited to declare any current or previous history of criminal offences or convictions within the UK or any other country, which may have been recorded against them.
- Applicants will also be invited to declare if they are, or have been, subject to any police investigation or prosecution within the UK or any other country.
- On the basis of careful risk assessment, ECG/Makewell may choose to refuse employment on the grounds of actual or potential risk to the healthcare service being provided, to patient/clients or visitors, existing employees or associates.

DBS (Disclosure and Barring Service) and PVG (Scotland) checking:

- All staff working at in roles that are eligible for a DBS (Disclosure and Barring Service) check, now or in the future, will be required to undergo a DBS check at the level appropriate to the role, e.g. enhanced with barred list check, enhanced without barred list check or standard, prior to commencing employment, unless they have had a check within the previous 3 months or are members of the update service.
- No member of staff will be allowed to provide any unsupervised healthcare services to patient/clients (in the form of regulated activities), before an enhanced DBS and barred list check is carried out and completed.
- If ECG/ Makewell accept an existing DBS certificate from a prospective employee, verification will be required that the certificate belongs to the person named on it. This may be done by checking other forms of personal identification.
- Having a criminal record check which reveals a conviction, caution or other information, will not automatically mean that an individual cannot work for ECG/ Makewell. A fair and non-discriminatory risk assessment based on the person's skills, experience and suitability for the position applied for will be completed in accordance with the DBS policy.
- Where a DBS and barred list check confirms that a person is barred from working with adults and/or children, it is illegal to allow that person to engage in any regulated activities.
- All staff who provide regulated services will be subject to a 3 year DBS re-checking process. Employees will be notified in good time to allow a new application to be processed, prior to the expiry date.
- Employees will not be permitted to work unsupervised in a regulated activity if the new check is not received prior to the expiry date.

Information Held on File

For each member of staff, the following minimum information will be held on file:

- positive proof of identify
- a recent photograph
- confirmation of eligibility to work in the UK
- full employment history
- relevant qualifications
- registration with a professional body (where appropriate)
- required checks with the DBS
- declarations of any offences committed in the UK and outside the UK/EU
- satisfactory evidence of conduct in previous employment or education (specifically related to conduct in health and social care and with children and/or vulnerable adults)
- other pre-employment checks deemed appropriate by ECG/Makewell

Interview Records:

- Will be held within the file of each successful candidate.
- For unsuccessful candidates, interview records will be destroyed after six months.
- Candidate may have access to their personnel records through a Subject Access Request. on formal application to ECG/ Makewell.

Induction of New Staff:

All new staff will undergo a defined time period of induction following an agreed plan supported by their line manager. Further details are set out in the Induction Policy and Staff Handbook.

JOB APPLICANT PRIVACY NOTICE

Data controller: Jane Lambert, CEO and Sophie McCracken, COO.

Data protection officer: Clara Travers Director of Operations and Helen Hodges Director of Nursing and Quality.

As part of any recruitment process, ECG/Makewell collects and processes personal data relating to job applicants. We are committed to being transparent about how we collect and use that data and to meeting our data protection obligations.

What information does ECG/Makewell collect?

ECG/Makewell collects a range of information about you. This includes:

- Your name, address and contact details, including email address and telephone number
- Details of your qualifications, skills, experience and employment history
- Clinical registration number
- Information about your current level of remuneration, including benefit entitlements
- Whether or not you have a disability for which we need to make reasonable adjustments during the recruitment process
- Due diligence check information
- Information about your entitlement to work in the UK

We may collect this information in a variety of ways. For example, data might be contained in application forms or CVs, obtained from your passport or other identity documents, or collected through interviews or other forms of assessment, including online tests.

ECG/Makewell may also collect personal data about you from third parties, such as references supplied by former employers. We will seek information from third parties only once a job offer to you has been made and will inform you that we are doing so.

Data will be stored in a range of different places, including on your application record, in HR management systems and on other IT systems (including email).

Why Does ECG/Makewell Process Personal Data?

ECG/Makewell needs to process data to take steps at your request prior to entering into a contract with you. We may also need to process your data to enter into a contract with you.

In some cases, we need to process data to ensure that we are complying with our legal obligations. For example, it is required to check a successful applicant's eligibility to work in the UK before employment starts.

ECG/Makewell has a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows us to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. We may also need to process data from job applicants to respond to and defend against legal claims.

ECG/Makewell may process special categories of data, such as information about ethnic origin, sexual orientation or religion or belief, to monitor recruitment statistics. We may also collect information about whether or not applicants are disabled to make reasonable adjustments for candidates who have a disability. ECG/Makewell would process such information to carry out its obligations and exercise specific rights in relation to employment. For some roles, we are obliged to seek information about criminal convictions and offences. Where we seek this information, we do so because it is necessary for us to carry out our obligations and exercise specific rights in relation to employment.

If your application is unsuccessful, we may keep your personal data on file in case there are future employment opportunities for which you may be suited. We will ask for your consent before we keep your data for this purpose, and you are free to withdraw your consent at any time.

Who Has Access to Data?

Your information may be shared internally for the purposes of the recruitment exercise. This includes members of the recruitment team, interviewers involved in the recruitment process, managers in the business area with a vacancy and IT staff if access to the data is necessary for the performance of their roles.

We will not share your data with third parties, unless your application for employment is successful and we make you an offer of employment. We will then share your data with former employers to obtain references for you, employment background check providers to obtain necessary background checks and the Disclosure and Barring Service (where applicable) to obtain necessary criminal records checks, HR, payroll and IT.

ECG/Makewell not transfer your data outside the European Economic Area.

How Does ECG/Makewell Protect Data?

ECG/Makewell takes the security of your data seriously. We have internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties. (confidentiality, data protect etc)

For How Long Does ECG/Makewell Keep Data?

If your application for employment is unsuccessful, we will hold your data on file for six months after the end of the relevant recruitment process. If you agree to allow us to keep your personal data on file, we will hold your data on file for a further 6 months for consideration for future employment opportunities. At the end of that period or once you withdraw your consent, your data is deleted or destroyed.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file and retained during your employment. The periods for which your data will be held will be provided to you in a new privacy notice.

As a data subject, you have a number of rights. You can:

- Access and obtain a copy of your data on request
- Require ECG/Makewell to change incorrect or incomplete data
- Require ECG/Makewell to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing
- Object to the processing of your data where ECG/Makewell is relying on its legitimate interests as the legal ground for processing

If you would like to exercise any of these rights, please contact Clara Travers clara@ecgtraining.co.uk or Helen Hodges Helen@ecgtraining.co.uk. If you believe that ECG/Makewell has not complied with your data protection rights, you can complain to the Information Commissioner.

What If You Do Not Provide Personal Data?

You are under no statutory or contractual obligation to provide data to ECG/Makewell during the recruitment process. However, if you do not provide the information, we may not be able to process your application properly or at all.

Automated Decision-Making:

Recruitment processes are not based solely on automated decision-making.

Ensuring The Effectiveness Of The Policy Statement:

Candidates will be introduced to the job applicant privacy notice via the recruitment process. The policy will be reviewed annually, and amendments will be proposed and agreed by the CEO and COO.

Non-Adherence:

Breaches of this policy will be dealt with under the Grievance and/or Disciplinary procedures as appropriate.

Distribution:

This policy will be available to all staff via the Share Drive.

External References:

- Health and Social Care Act 2008 (Regulated Activities) Regulations 2014
- Care Quality Commission (CQC) Guidance
- Disclosure and Barring Service (DBS) Guidelines
- General Medical Council (GMC) Guidelines
- Nursing and Midwifery Council (NMC) Standards

Internal Documents – available via Share Drive:

- ECG/Makewell Induction and Probation policy
- ECG/Makewell Equality and Diversity Policy
- ECG/Makewell Staff Handbook