



# Recruitment Policy

## VERSION CONTROL

<b>Reference Number</b> RP1	<b>Version</b> 6.0	<b>Status</b> Final	<b>Sponsor(s)/Author(s)</b> P Godbole/N Salkeld
<b>Amendments :</b>	Full review and update to reflect current legislation, safer recruitment principles, UK GDPR, safeguarding and independent healthcare governance.		
<b>Document objectives:</b> This policy outlines the principles, responsibilities and procedures to be adopted when recruiting staff to Pioneer Healthcare			
<b>Intended Recipients:</b> All individuals involved with recruitment			
<b>Group/Persons Consulted:</b> Executive Management Team			
<b>Training/Resource Implications:</b> Recruitment and safeguarding awareness training			
<b>Approving Body and Date Approved</b>		Executive Board – May 2026	
<b>Next Review Date</b>		May 2029	

The table below logs the history of the steps in development of the document.

<b>Version</b>	<b>Date</b>	<b>Author</b>	<b>Comment</b>
1.0	Sep 2011	N Salkeld P Godbole	
2.0	Jan 2014	N Salkeld P Godbole	
3.0	Jan 2017	NS/PPG	Update to checks to include admin
4.0	Dec 2018	NS	DPA updated
5.0	Oct 2024	NS/PPG	Addition of clause 6 Diversity, Inclusion and Equality
6.0	May 2026	NS/PPG	Full legislative and safer recruitment update

## **1. INTRODUCTION**

Recruiting the right staff is essential to the safe delivery of healthcare services, organisational reputation, patient safety and staff retention. Pioneer Healthcare Limited (PH) recognises that effective recruitment and selection processes support high quality care and reduce risks to patients, staff and the organisation.

Pioneer Healthcare is committed to fair, transparent, lawful and safer recruitment practices. The organisation aims to attract and recruit individuals with the appropriate qualifications, experience, values and behaviours required to deliver safe and effective healthcare services.

As an independent healthcare provider delivering NHS secondary care services, PH will ensure that recruitment processes align with relevant legislation, NHS Employment Check Standards, safeguarding responsibilities and CQC expectations.

Pre-employment checks form an integral part of PH's recruitment, onboarding and governance arrangements and are essential in ensuring the suitability of individuals employed or engaged by the organisation.

## **2. STATEMENT**

PH will ensure that recruitment and pre-employment screening processes are undertaken consistently, proportionately and fairly.

Responsibility for coordinating recruitment checks will normally sit with HR or a designated senior manager responsible for recruitment compliance.

A dedicated manager or senior member of staff will oversee the recruitment process to ensure:

- checks and protocols are adhered to;

- safeguarding responsibilities are met;
- information is shared appropriately;
- recruitment decisions are objective and evidence-based.

The level and degree of checks carried out will be proportionate to the role, level of responsibility and potential risk to patients, staff or organisational assets.

All recruitment practices and procedures will:

- comply with relevant legislation;
- support equality of opportunity;
- avoid unlawful discrimination;
- support safer recruitment principles;
- maintain confidentiality and data protection requirements.

Pioneer Healthcare is committed to safeguarding and promoting the welfare of children, young people and vulnerable adults and expects all staff to share this commitment.

### **3. RECORDING OF CHECKS**

PH will carry out all recruitment and pre-employment checks in compliance with:

- UK General Data Protection Regulation (UK GDPR);
- Data Protection Act 2018;
- Human Rights Act 1998;
- relevant safeguarding legislation.

Information obtained during recruitment will:

- only be used for lawful recruitment purposes;
- be limited to information relevant to the recruitment decision;
- be securely stored;
- be retained and disposed of in accordance with PH retention procedures.

Recruitment records must be accurate, auditable and capable of demonstrating compliance with employment and safeguarding standards.

### **4. USE OF AGENCIES, CONTRACTORS AND OTHER EXTERNAL BODIES**

Ultimately, responsibility for ensuring appropriate pre-employment checks rests with PH.

Where recruitment or staffing arrangements are delegated to agencies, contractors or external providers, PH will ensure through audit, monitoring and contractual arrangements that appropriate recruitment standards are maintained.

This requirement will cascade from contract to subcontract arrangements.

Contracts with agencies providing clinical or administrative staff will include:

- details of required pre-employment checks;
- confirmation that staff supplied have been appropriately screened;
- responsibility for maintaining ongoing compliance;
- the right for PH to audit recruitment records;
- obligations to disclose disciplinary or safeguarding concerns;
- notification where registration, licensing or employment status changes;
- compliance with safeguarding and confidentiality requirements.

PH reserves the right to refuse or remove agency workers where adequate assurance cannot be demonstrated.

## **5. EMPLOYMENT CHECK STANDARDS**

Clinical staff providing services for PH will normally be existing or former NHS employees or individuals who satisfy NHS Employment Check Standards and independent healthcare sector requirements.

These standards apply to:

- permanent staff;
- temporary staff;
- fixed-term staff;
- consultants;
- agency workers;
- contractors;
- students and trainees;
- volunteers.

Failure to comply with these standards may place patients, staff and the organisation at risk.

The NHS Pre Employment Check Standards include:

1. Verification of identity
2. Right to work checks
3. Registration and qualification checks
4. Employment history and reference checks
5. Criminal record checks
6. Occupational health checks

Additional checks may be undertaken depending upon the role.

## **5.1. Clinical Staff and Consultants**

For Consultants providing services for PH, all individuals must obtain and maintain valid Practising Privileges where required by the independent hospital provider.

The following checks will normally be undertaken:

1. Verification of identity
2. Right to work verification
3. Inclusion on the General Medical Council Register with a license to practice. General Practitioners will be on the GP register. Nurses will be on the NMC Register and Allied Healthcare Professionals on the HCPC Register.
4. Verification of professional registration and qualifications
5. Evidence of appraisal and/or revalidation
6. Employment history and references
7. Enhanced DBS check where applicable
8. Occupational health clearance where applicable
9. Mandatory training compliance
10. Safeguarding Adults training at a level commensurate to their role
11. Safeguarding Children training where applicable at a level commensurate to their role
12. Evidence of appropriate indemnity insurance where applicable

Professional registrations must remain valid throughout engagement with PH and will be subject to periodic monitoring.

## **5.2. Administrative and Non-Clinical Staff**

For administrative and non-clinical staff the following checks will normally be undertaken:

1. Verification of identity
2. Right to work verification
3. Employment history and reference checks
4. Criminal records check where appropriate to role
5. Occupational health clearance where applicable
6. Confidentiality and information governance requirements
7. Mandatory training compliance including Information Governance

## **5.3 Right to Work Checks**

PH will undertake Right to Work checks in accordance with Home Office guidance and prevention of illegal working legislation.

Appropriate visa and immigration status documentation must be provided prior to commencement of employment.

Repeat checks will be undertaken where permission to work in the UK is time limited.

## **5.4. Safeguarding and Criminal Record Checks**

Where roles involve contact with children or vulnerable adults, appropriate DBS checks will be undertaken in accordance with safeguarding legislation and DBS eligibility guidance.

Recruitment decisions involving criminal convictions will be assessed proportionately, taking into account:

- relevance to role;
- seriousness of offence;
- safeguarding risk;
- rehabilitation;
- legal obligations.

## **5.5. Probationary Periods**

All new employees may be subject to a probationary period during which:

- performance;
- conduct;
- capability;
- attendance;
- compliance with organisational policies

will be reviewed.

Confirmation of employment may be dependent upon satisfactory completion of probation requirements

## **6. DIVERSITY, EQUALITY AND INCLUSION**

Pioneer Healthcare recognises that some sections of society experience prejudice and discrimination.

Discrimination may occur in one of the following forms:

### **6.1 Direct discrimination**

Treating someone unfairly because of a protected characteristic.

## **6.2 Indirect discrimination**

Applying rules or arrangements which disadvantage individuals with protected characteristics.

## **6.3 Discrimination by association**

Treating someone less favourably because of association with another person with a protected characteristic.

## **6.4 Discrimination by perception**

Treating someone unfairly because they are perceived to have a protected characteristic.

## **6.5 Harassment**

Unwanted conduct linked to a protected characteristic that violates dignity or creates an offensive environment.

## **6.6 Victimisation**

Treating someone unfairly because they have raised concerns relating to discrimination or harassment.

The Equality Act 2010 recognises the following protected characteristics:

- age;
- disability;
- gender reassignment;
- marriage and civil partnership;
- pregnancy and maternity;
- race;
- religion or belief;
- sex;
- sexual orientation.

PH is committed to:

- equality of opportunity;
- inclusive recruitment;
- anti-discriminatory practice;
- fair treatment for all applicants and staff.

Reasonable adjustments will be considered throughout the recruitment process for applicants with disabilities or additional needs.

Recruitment decisions will be based on:

- merit;
- suitability for role;
- qualifications;
- experience;
- values and behaviours.

Pioneer Healthcare believes all individuals have the right to be treated with dignity, fairness and respect and is committed to eliminating unlawful discrimination and promoting an inclusive workforce culture.

## **7. INFORMATION GOVERNANCE AND CONFIDENTIALITY**

All staff recruited by PH are expected to:

- maintain confidentiality;
- comply with information governance requirements;
- complete mandatory information governance and cyber security training;
- adhere to organisational policies relating to information security and acceptable use.

Breaches of confidentiality or information security may result in disciplinary action.

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## **8. REVIEW OF POLICY**

This policy will be reviewed every three years or sooner where:

- legislation changes;
  - safeguarding guidance changes;
  - NHS Employment Check Standards are updated;
  - organisational changes occur;
  - significant incidents identify the need for review.
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## **9. POLICY APPROVAL**

Pioneer Healthcare recognises that safe and effective recruitment practices are fundamental to the delivery of high-quality healthcare services and the protection of patients, staff and the organisation.

This policy is fully endorsed and approved by the Pioneer Healthcare Executive Board.