

UT COMPLIANCE

A TRADING NAME OF UNIQUE TENDERS LIMITED

POLICY DOCUMENT

Recruitment and Selection Policy

UT Compliance

BUNDLE PACKAGE | SUPPORTED LIVING

| | |
|------------------------------|--|
| DOCUMENT REFERENCE — | EFFECTIVE DATE 1 February 2026 |
| VERSION SL/RAS/001 | REVIEW DATE — |
| STATUS Publish | APPROVED BY — |

CONFIDENTIAL DOCUMENT

This document is intended for authorised personnel only. Unauthorised distribution is prohibited.

© 2026 UT Compliance. All Rights Reserved.

This policy has been developed in accordance with the Equality Act 2010, the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014, the Safeguarding Vulnerable Groups Act 2006, and all applicable employment and health and safety legislation. It sets out the framework through which recruits, selects, and retains a workforce that is safe, skilled, and committed to delivering high-quality, person-centred supported living services.

1. Scope

1.1 Purpose

The purpose of this policy is to establish a consistent, fair, legally compliant, and effective approach to the recruitment and selection of staff across all supported living services operated by . Recruiting the right people is the single most important factor in ensuring the safety and quality of care delivered to individuals with care and support needs. The organisation recognises that every appointment carries a duty of care not only to the candidate but, most critically, to the people they will be supporting.

This policy aims to ensure that:

- All recruitment and selection activity is conducted lawfully, transparently, and free from discrimination.
- Only individuals who are suitable, safe, and have the values and competencies required for work in supported living are appointed.
- All required pre-employment checks, including enhanced DBS disclosure and barring checks, are completed before any candidate begins work.
- The organisation actively promotes diversity and inclusion in its recruitment practice and creates an environment in which people from all backgrounds are encouraged to apply.
- Staff wellbeing is embedded from the point of recruitment, creating the foundations for a motivated, resilient, and committed workforce.
- Lone working risks are assessed and communicated to candidates at the point of recruitment, and appropriate support systems are in place from the first day of employment.

1.2 Application

This policy applies to all recruitment and selection activity undertaken by , including the recruitment of permanent, part-time, and fixed-term employees, bank and zero-hours workers, volunteers, and work placement students. It applies to all roles within the organisation, from frontline support workers through to senior managers and Directors. Where agency or temporary workers are engaged through a staffing agency, the Registered Manager must ensure that the agency operates equivalent pre-employment checking standards before any worker is placed.

1.3 Policy Aims

1. Establish a structured, consistent, and legally compliant recruitment and selection process for all roles.
2. Ensure that the safeguarding of individuals supported is at the centre of all recruitment decisions.
3. Promote equality of opportunity and actively reduce barriers to employment for all candidates.
4. Embed staff wellbeing principles from the point of attraction and selection, fostering long-term retention and workforce sustainability.

5. Ensure that all staff recruited to roles involving lone working are appropriately assessed, informed, and supported from the outset of their employment.
6. Maintain full compliance with CQC Regulation 19 (Fit and Proper Persons Employed) and Regulation 5 (Fit and Proper Persons – Directors) at all times.

1.4 Who This Policy Applies To

All managers and staff involved in any aspect of the recruitment and selection process are required to comply with this policy. This includes those involved in advertising roles, shortlisting candidates, conducting interviews, completing pre-employment checks, and making appointment decisions. The Registered Manager holds overall accountability for ensuring that recruitment practice across the organisation meets the standards set out in this policy.

1.5 Exclusions and Limitations

This policy covers the recruitment of external candidates and internal transfers to new roles. It does not address promotion processes for existing staff where no external advertisement takes place, which are governed by the Supervision and Appraisal Policy. The use of agency workers is subject to this policy in respect of pre-employment checking requirements, but the selection of specific agency workers rests with the agency subject to the organisation's minimum standards.

1.6 Relationship to Other Policies

- Good Governance Policy
- Safeguarding Adults at Risk Policy
- Equality, Diversity, and Inclusion Policy
- Health and Safety Policy
- Supervision and Appraisal Policy
- Whistleblowing Policy
- Information Governance and Data Protection Policy
- Disciplinary and Grievance Policy
- Induction Policy
- Lone Working Risk Assessment Framework

2. Legal and Regulatory Framework

| Legislation / Regulation | Requirements and Relevance |
|--------------------------|---|
| Equality Act 2010 | Prohibits discrimination in recruitment and employment on the grounds of protected characteristics including age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation. Recruitment processes must not directly or indirectly discriminate against candidates. Reasonable adjustments must be made at every stage of recruitment for candidates with disabilities. |

| Legislation / Regulation | Requirements and Relevance |
|---|--|
| Health and Social Care Act 2008 (Regulated Activities) Regulations 2014 – Regulation 19 | Regulation 19 (Fit and Proper Persons Employed) requires providers to ensure that persons employed in the carrying on of the regulated activity are of good character, have the necessary qualifications, competence, skills, and experience, and are able to perform the work required. All relevant checks must be completed before employment commences. |
| Health and Social Care Act 2008 (Regulated Activities) Regulations 2014 – Regulation 5 | Regulation 5 (Fit and Proper Persons – Directors) sets equivalent standards for persons in director-level roles, requiring that they are of good character, physically and mentally able to perform their role, qualified, and capable of properly discharging their responsibilities. |
| Safeguarding Vulnerable Groups Act 2006 | Established the DBS barring scheme and makes it a criminal offence to employ a barred person in regulated activity with vulnerable adults. Employers must check the DBS adults' barred list before appointing to any role involving regulated activity. Enhanced DBS checks are mandatory for all staff in supported living roles. |
| Police Act 1997 – Part V | Provides the legal basis for the Disclosure and Barring Service to disclose criminal records information to registered bodies. Enhanced DBS disclosure with a barring list check is required for all roles in regulated activity involving vulnerable adults. |
| Rehabilitation of Offenders Act 1974 (Exceptions Order 1975) | Roles in regulated activity with vulnerable adults are exempt from the general provisions of the Rehabilitation of Offenders Act. This means that candidates must disclose all convictions, cautions, and reprimands, including spent convictions, when applying for roles covered by this policy. The organisation must handle this information fairly and in accordance with DBS guidance. |
| Immigration, Asylum and Nationality Act 2006 and Immigration Act 2014 | Employers have a legal duty to carry out right to work checks on all employees before they commence employment. Employing a person who does not have the right to work in the United Kingdom is a criminal offence. The organisation must retain copies of right to work documents in accordance with Home Office requirements. |
| Employment Rights Act 1996 | Sets out the fundamental rights of employees, including the right to a written statement of employment particulars. All employees must receive a contract of employment or written statement before or on their first day of employment. |
| Health and Safety at Work Act 1974 and Management of Health and Safety at Work Regulations 1999 | The employer's duty to ensure the health, safety, and welfare of employees applies from the point of recruitment. Lone working risks must be assessed and communicated during induction and, where relevant, at the recruitment stage. New and expectant mothers and young workers have specific risk assessment requirements. |
| Working Time Regulations 1998 | Governs maximum working hours, rest breaks, and annual leave entitlements. Recruitment documentation and contracts of employment must accurately reflect working time arrangements and must not require workers to work in excess of legal limits without a valid opt-out. |
| UK General Data Protection Regulation and Data Protection Act 2018 | Candidate data collected during recruitment is personal data and must be processed lawfully, fairly, and transparently. Candidates must be provided with a privacy notice explaining how their data will be used. Unsuccessful candidate data must be retained for no longer than six months and then securely destroyed, unless a longer period is justified. |
| Modern Slavery Act 2015 | The organisation must ensure that its recruitment practices do not facilitate or contribute to modern slavery or human trafficking. Warning signs including job adverts that are too good to be true, candidates who appear to be controlled by a third party, or unusual accommodation arrangements must be identified and reported. |
| National Minimum Wage Act 1998 | All workers must be paid at least the National Minimum Wage or National Living Wage as applicable. Job adverts and contracts of employment must accurately state the rate of pay. |

3. Definitions of Key Terms

| Term | Definition |
|--------------------------|--|
| Regulated Activity | Activity involving close contact with vulnerable adults that requires an enhanced DBS check with a barred list check. In supported living, this includes personal care, health care, social work, and other specified activities. Staff employed in regulated activity must not be barred by the DBS. |
| Enhanced DBS Check | A Disclosure and Barring Service check that reveals all convictions, cautions, reprimands, and warnings held on the Police National Computer, including spent convictions, plus any relevant local police information. For regulated activity, the check also includes a check of the adults' (and children's, where applicable) barred list. |
| Fit and Proper Person | A person who meets the criteria set out in Regulation 19 of the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014: of good character, suitably qualified and experienced, physically and mentally able to perform their role, and free from any unspent criminal conviction that would call their suitability into question. |
| Person Specification | A document that sets out the essential and desirable criteria a candidate must meet to be considered for a role, including qualifications, experience, skills, knowledge, and personal attributes. The person specification forms the basis for shortlisting and selection decisions and must be applied consistently to all candidates. |
| Job Description | A document that describes the purpose, main duties, and responsibilities of a role, the reporting relationships, the working conditions, and the key performance expectations. The job description must accurately reflect the nature of the role and must be provided to all candidates. |
| Safer Recruitment | An approach to recruitment that prioritises the safeguarding of vulnerable individuals by incorporating specific practices designed to deter unsuitable applicants, identify concerning information, and ensure thorough pre-employment checking. Safer recruitment is a regulatory requirement for all roles in regulated activity. |
| Right to Work Check | A mandatory pre-employment check to verify that a candidate has the legal right to work in the United Kingdom. Checks must be conducted before employment commences. Original documents must be inspected and copies retained in the personnel file. |
| Lone Working | Any situation in which a member of staff carries out their duties without the immediate physical presence of a colleague or manager. In supported living, lone working may occur in an individual's home, in the community, or during overnight or early morning shifts with reduced staffing. Lone working carries specific health and safety obligations for the employer. |
| Staff Wellbeing | The overall physical, mental, and emotional health and welfare of employees in the context of their working life. Staff wellbeing encompasses workload, working conditions, workplace relationships, access to support, opportunities for development, and the culture and values of the organisation. |
| Values-Based Recruitment | A recruitment approach that assesses candidates not only on skills and qualifications but on their personal values, attitudes, and behaviours, particularly in relation to compassion, respect, dignity, and commitment to person-centred care. Values-based recruitment is strongly advocated by NHS England and the CQC as a safeguarding and quality assurance tool. |
| Conditional Offer | A job offer made to a candidate that is subject to the satisfactory completion of specified pre-employment checks, including DBS disclosure, references, right to work verification, and health assessment where applicable. Employment must not commence until all conditions have been met. |

| Term | Definition |
|----------------------------------|--|
| Structured Interview | An interview format in which all candidates are asked the same set of pre-determined questions, with responses assessed against consistent scoring criteria. Structured interviews reduce the risk of bias and ensure a fair and legally defensible selection process. |
| Pre-Employment Health Assessment | An occupational health assessment conducted after a conditional offer has been made to determine whether a candidate has any health condition that may affect their ability to perform the role, and to identify any adjustments that may be required under the Equality Act 2010. |
| Barred List | The Adults' Barred List, maintained by the DBS, which lists individuals who are barred from working in regulated activity with vulnerable adults. Employing a barred person in regulated activity is a criminal offence for both the employer and the individual. |

4. Policy Statement

4.1 Commitment to Safe and Values-Based Recruitment

is committed to recruiting a workforce that is not only competent and experienced but fundamentally safe, compassionate, and aligned with our values of dignity, respect, and person-centred care. We recognise that the quality of care delivered to every individual we support begins with the quality of the people we recruit. Every recruitment decision is therefore a safeguarding decision, and it will be treated as such at every stage of the process.

We commit to:

- Applying safer recruitment principles to every appointment, regardless of the urgency of the vacancy or the familiarity of the candidate.
- Conducting all required pre-employment checks without exception before any new member of staff commences work.
- Selecting candidates on the basis of merit, assessed against transparent and consistently applied criteria.
- Never appointing a candidate to a role involving regulated activity until a satisfactory enhanced DBS disclosure with barred list check has been received.
- Creating a recruitment experience that treats every candidate with respect and reflects the values of the organisation.

4.2 Commitment to Equality and Diversity

is an equal opportunities employer committed to creating a workforce that reflects the diversity of the communities we serve. We will not discriminate against any candidate on the grounds of any protected characteristic and will actively seek to remove barriers to employment for people from under-represented groups. We believe that a diverse workforce brings a richness of perspective and experience that directly benefits the individuals we support.

4.3 Commitment to Staff Wellbeing

The wellbeing of our staff is not an afterthought or a peripheral concern. It is a strategic priority that is embedded in our approach to recruitment, induction, and ongoing employment. We recognise that care work, and particularly supported living, can be emotionally demanding, physically challenging, and, in the context of lone working, sometimes isolating. We will identify

and respond to wellbeing needs from the very first point of contact with a candidate and will create employment conditions that support staff to thrive in their roles for the long term.

4.4 Commitment to Safe Lone Working

Many roles within involve an element of lone working. We take our duty of care to lone workers seriously and will ensure that all staff working alone are assessed, trained, equipped, and supported before, during, and after any lone working activity. Lone working protocols will be clearly communicated during recruitment and induction, and all staff will be provided with the tools, systems, and contacts they need to work safely and confidently on their own.

5. Roles and Responsibilities

| Role | Key Responsibilities |
|---------------------------------|--|
| All Staff | Represent positively when participating in recruitment activity, including interviews and induction support. Report any concern about the conduct, suitability, or safety of a newly appointed or newly commenced colleague to the Registered Manager immediately. Support new staff during their induction period and contribute to a welcoming, inclusive workplace culture. Participate in staff wellbeing initiatives and raise concerns about their own or colleagues' wellbeing through the appropriate channels. Follow lone working protocols at all times and report any concern about the safety of lone working arrangements. |
| Registered Manager | Hold overall accountability for safe, compliant, and effective recruitment and selection across the organisation. Ensure that all vacancies are filled in accordance with this policy and that no candidate commences work before all required pre-employment checks are satisfactorily completed. Maintain accurate records of all pre-employment checks and ensure they are accessible for CQC inspection. Ensure that the organisation's recruitment practice meets the requirements of CQC Regulation 19 at all times. Oversee the organisation's staff wellbeing programme and ensure that wellbeing considerations are embedded in recruitment, induction, and ongoing employment practice. Ensure that lone working risk assessments are in place for all relevant roles and that lone working protocols are communicated to all affected staff. Review and update this policy at least annually. |
| Duty Manager (Operational Lead) | Ensure that no new or agency staff member carries out lone working activities until they have completed the organisation's lone working induction and have been issued with a lone working protocol and check-in arrangements. Act as the operational point of contact for lone working check-ins during shifts, ensuring that all lone workers are accounted for at required intervals. Initiate the lone worker emergency response protocol where a check-in is missed and the lone worker cannot be contacted within the specified timeframe. Monitor the wellbeing of staff during shifts, identifying signs of distress, fatigue, or difficulty and escalating to the Registered Manager. Ensure that new starters are properly briefed and supported during their induction period when on shift. |
| Safeguarding Lead | Advise on safer recruitment requirements and ensure that safeguarding considerations are embedded in the recruitment and selection process. Review any DBS disclosure or reference information that raises a safeguarding concern and advise the Registered Manager on whether the candidate is suitable for appointment. Ensure that all staff involved in recruitment have received safer recruitment training. Monitor the safeguarding implications of lone working arrangements and advise on risk mitigation strategies. |
| Health and Safety Officer | Ensure that lone working risk assessments are completed for all relevant roles and are reviewed annually and following any lone working incident. Advise on the health and safety requirements for new roles and ensure that job descriptions and role profiles accurately reflect any physical or environmental demands. Ensure that new starters receive health and safety induction training, including lone working protocols, before carrying out any lone working activity. Maintain the lone worker monitoring system and ensure that all staff, managers, and the Duty Manager understand how to use it. Investigate any lone working incident and produce recommendations to prevent recurrence. |

| Role | Key Responsibilities |
|-------------------------|---|
| Data Protection Officer | Ensure that candidate data collected during recruitment is processed in compliance with UK GDPR and the Data Protection Act 2018. Ensure that privacy notices are provided to candidates at the point of application. Advise on the retention and disposal of unsuccessful candidate data. Ensure that DBS disclosure information is handled in accordance with the DBS Code of Practice and the organisation's DBS policy. Advise on the lawful basis for processing sensitive recruitment data, including health information and criminal records data. |

6. Procedures

6.1 Workforce Planning

Effective recruitment begins with robust workforce planning. Before any vacancy is advertised, the Registered Manager will conduct a workforce review that considers:

- The reason for the vacancy, including whether it arises from natural turnover, service growth, or a change in care needs.
- Whether the role is still required in its current form or whether a restructure, reallocation of duties, or change to working hours would better serve the needs of the service.
- The skill mix and experience profile of the existing team, and what specific attributes the new appointment should bring.
- Whether the vacancy should be advertised internally before external advertisement.
- The anticipated timeline for filling the vacancy and the interim arrangements required to maintain safe staffing levels during the recruitment process.

6.2 Job Analysis, Job Description, and Person Specification

Every vacancy must be supported by an up-to-date job description and person specification before advertisement. These documents must:

- Accurately reflect the duties, responsibilities, and working conditions of the role, including whether it involves lone working, personal care, night duties, or working in the community.
- Specify the essential and desirable qualifications, experience, skills, and personal attributes required.
- Include a clear statement that the role is subject to an enhanced DBS check with barred list check.
- Include a values statement that sets out the behaviours and attitudes the organisation expects of all its staff.
- Specify the rate of pay, working hours, and key contractual terms accurately.

Job descriptions and person specifications must be reviewed at least annually and updated whenever the nature of the role changes significantly. Generic, out-of-date, or inaccurate role documentation must not be used in recruitment.

6.3 Advertising and Attraction

will use a range of recruitment channels to attract a diverse pool of qualified candidates. All job adverts will:

- Accurately represent the role, the organisation, and the terms of employment.

- Include a statement of the organisation's commitment to equality and diversity.
- State clearly that the role is subject to an enhanced DBS check and is exempt from the Rehabilitation of Offenders Act 1974.
- Include a brief description of the organisation's commitment to staff wellbeing and lone working support, to attract candidates who understand and are prepared for the nature of supported living work.
- Not include criteria that could have the effect of indirectly discriminating against candidates with protected characteristics, unless those criteria can be objectively justified by the requirements of the role.

Recruitment advertising must not be placed through channels or in a manner that could attract candidates who are barred from working with vulnerable adults or who might seek to exploit the organisation's recruitment process.

6.4 Application and Shortlisting

All applicants must complete 's standard application form. CVs alone will not be accepted as a substitute for the application form. The application form will include:

- A full employment history with no unexplained gaps.
- An explanation of any gaps in employment exceeding one month.
- A declaration of any criminal convictions, cautions, or reprimands, including spent convictions, in accordance with the Exceptions Order 1975.
- Two referee contacts, at least one of whom must be the applicant's most recent or current employer.
- A declaration that the information provided is accurate and complete, and confirmation that the applicant understands that providing false information may result in withdrawal of any offer or dismissal.

Shortlisting will be carried out by at least two members of staff who have received safer recruitment training, one of whom must be the Registered Manager or a senior designate. Shortlisting decisions must be recorded against the person specification criteria and must be applied consistently to all applicants. No candidate may be shortlisted on the basis of personal connections, prior acquaintance, or any other factor unrelated to the person specification.

6.5 Interview and Selection

uses structured, values-based interviews as its primary selection tool. All interviews will be conducted by a panel of at least two people, at least one of whom must have completed safer recruitment training.

The interview process will include:

- **Structured questions:** A consistent set of questions asked of all candidates, including values-based questions, competency questions, and scenario-based questions relevant to supported living practice.
- **Safer recruitment questions:** Questions specifically designed to explore the candidate's motivations for working with vulnerable adults, their understanding of safeguarding, their approach to professional boundaries, and any aspects of their employment history that require clarification.
- **Gap exploration:** Unexplained gaps in employment history identified on the application form must be explored during the interview. Unsatisfactory explanations must be recorded and considered in the appointment decision.
- **Values assessment:** Candidates will be assessed on their demonstration of the organisation's core values, including compassion, respect, honesty, and commitment to person-centred care.

- **Lone working awareness:** All candidates for roles involving lone working must be asked about their understanding of and attitude towards lone working, and their ability to work independently with appropriate boundaries.

Scoring sheets must be completed by all panel members independently before discussion, and the outcome of each interview must be documented. Where a candidate is not appointed, the reasons for the decision must be recorded and retained. Interview notes must be retained for a minimum of six months following the interview.

Additional selection methods may be used where appropriate, including skills assessments, written exercises, or a supervised practice observation. These must be assessed against objective, pre-defined criteria and applied consistently to all candidates.

6.6 Pre-Employment Checks

No candidate may commence employment with until all of the following pre-employment checks have been satisfactorily completed. The Registered Manager is responsible for ensuring that checks are completed in a timely manner and that records are maintained accurately.

A candidate must NEVER begin work in a role involving regulated activity before a satisfactory enhanced DBS check with barred list check has been received, even in an emergency. Starting someone before DBS clearance is received without documented risk management approval from the Registered Manager and appropriate supervision arrangements is a serious governance and safeguarding failure.

| Pre-Employment Check | Mandatory / Desirable | Notes |
|--|--|--|
| Enhanced DBS check with Adults' Barred List check | Mandatory for all regulated activity roles | Must be obtained before commencement. If a start before receipt is approved, written risk management must be in place and the individual must be supervised at all times. |
| Right to work verification | Mandatory for all roles | Original documents must be inspected and copies retained. Re-checked for employees with time-limited right to work before expiry. |
| Two satisfactory references | Mandatory for all roles | At least one reference must be from the most recent or current employer. References must be from a manager or HR, not a personal contact. All references must be received before commencement. |
| Identity verification | Mandatory for all roles | Original photographic ID must be verified and a copy retained. Acceptable documents include passport, driving licence, or biometric residence permit. |
| Qualifications verification | Mandatory where qualifications are specified in the person specification | Original certificates must be verified and copies retained. |
| Occupational health / pre-employment health assessment | Required where health considerations are relevant to the role | Conducted only after a conditional offer. Must comply with Equality Act 2010 requirements. Results used only to identify adjustments, not as grounds for discrimination. |
| Professional registration check (NMC, HCPC, SWE) | Mandatory where applicable | Where a role requires professional registration, the register must be checked directly with the relevant body before commencement. |

| Pre-Employment Check | Mandatory / Desirable | Notes |
|--------------------------------|---|---|
| Overseas criminal record check | Required where candidate has lived or worked overseas for 12 months or more in the past 5 years | UK DBS check does not cover overseas criminal records. Guidance from the relevant country's authority should be sought. |

6.7 References

References are an important component of the safer recruitment process and must be treated as such. The following requirements apply:

- Two references must be obtained for every candidate. At least one must be from the applicant's most recent or current employer. Where the applicant has recently left a role in a regulated activity setting, a reference must be sought from that employer.
- References must be sought in writing. Telephone references may supplement written references but must not replace them. All telephone references must be documented, with the name of the referee, the date, and the content of the conversation recorded.
- References must be sent directly from the referee to and must not be passed through the candidate.
- Where a reference raises any concern about the candidate's conduct, performance, honesty, or suitability for work with vulnerable adults, the Registered Manager must discuss the concern with the candidate before a final appointment decision is made, and the outcome of that discussion must be documented.
- Where a previous employer declines to provide a substantive reference, the reasons must be explored. A simple confirmation of employment dates in response to questions about conduct or performance may itself be a cause for concern.
- Character references from family members, friends, or personal acquaintances are not acceptable as substitutes for employment references.

6.8 Conditional Offers and Commencement

Following a successful interview and satisfactory completion of all pre-employment checks, the Registered Manager will make a formal conditional offer of employment in writing. The offer letter will:

- Clearly state the role, the proposed start date, the rate of pay, and the hours of work.
- List all the conditions that must be met before employment can commence.
- Confirm the need for an enhanced DBS check and the organisation's position on starting before receipt.
- Include a statement about the organisation's commitment to staff wellbeing and the support available to new employees.
- Provide information about the induction programme, including any mandatory training to be completed in the first four weeks.

A contract of employment or written statement of employment particulars will be provided to all new employees on or before their first day of employment in accordance with the Employment Rights Act 1996.

6.9 Induction

All new employees must complete a structured induction programme before working unsupported. The induction programme will cover:

- The organisation's values, culture, and commitment to person-centred care.
- Key policies and procedures, including safeguarding, medication management, consent, and lone working.
- Introduction to the individuals they will be supporting and the requirements of their care plans.
- Mandatory training including safeguarding, MCA, manual handling, fire safety, first aid awareness, and medication management.
- Lone working protocols, check-in requirements, and emergency procedures.
- Staff wellbeing support, including supervision arrangements, Employee Assistance Programme information, and how to raise concerns.
- Health and safety induction, including risk assessment awareness and incident reporting.

Induction must be completed within the first four weeks of employment. The Registered Manager is responsible for ensuring that the induction programme is completed and that a signed record is retained in the staff member's personnel file.

6.10 Probationary Period

operates a probationary period of six months for all new employees. During this period:

- The new employee will receive formal supervision at monthly intervals, with the first supervision taking place within the first two weeks of employment.
- Performance, conduct, and attendance will be actively monitored against the requirements of the role and the person specification.
- Any concern about performance, conduct, suitability, or safeguarding will be addressed promptly and in accordance with the organisation's Disciplinary Policy.
- A formal probationary review will be conducted at the end of the probationary period, with the outcome either confirming the employee in post, extending the probationary period by up to three months, or terminating employment where the required standard has not been met.
- The employee's wellbeing and experience of the induction period will be discussed at each supervision session, and any adjustments required to their support or working arrangements will be considered and implemented.

7. Training and Development

7.1 Recruitment-Related Training Requirements

| Training Subject | Frequency | Applicable Staff |
|--|--|--|
| Safer Recruitment in Education and Social Care | Before participating in recruitment; every 3 years | All staff involved in interview panels or shortlisting |

| Training Subject | Frequency | Applicable Staff |
|--|------------------------------------|--|
| Equality and Diversity in Recruitment | Every 2 years | All recruiting managers |
| Values-Based Interviewing Techniques | Before participating in interviews | All interview panel members |
| DBS and Pre-Employment Checking Procedures | Induction, then every 2 years | Registered Manager, HR lead |
| Lone Working Safety and Emergency Procedures | Induction, then annually | All staff in roles with lone working component |
| Staff Wellbeing and Mental Health Awareness | Induction, then every 2 years | All staff |
| Mental Health First Aid | Every 3 years | At least one qualified MHFA per service |
| Modern Slavery Awareness | Induction, then every 2 years | All staff involved in recruitment |

7.2 Continuous Development

is committed to the ongoing development of all staff from the point of recruitment. All employees will be supported to:

- Complete the Care Certificate if they do not already hold it, within the first twelve weeks of employment.
- Progress towards a relevant vocational qualification at Level 2 or Level 3 in Health and Social Care within the first year of employment.
- Access a personal development plan agreed at their first appraisal, identifying their learning goals and the support the organisation will provide to help them achieve them.
- Participate in reflective practice, peer learning, and team development activities as an ongoing component of their professional development.

8. Monitoring and Review

8.1 Recruitment Monitoring

will monitor the effectiveness, compliance, and fairness of its recruitment practice through the following mechanisms:

- **Pre-employment check compliance audit:** Monthly review of all personnel files for new starters to confirm that all required checks have been completed, documented, and are held on file. Any gap or deficiency will be escalated to the Registered Manager immediately.
- **Equality monitoring:** Anonymised equality data will be collected from all applicants and used to analyse whether the recruitment process is attracting a diverse range of candidates and whether any stage of the process is producing disproportionate outcomes for any group. Findings will be reviewed six-monthly.
- **Vacancy and turnover analysis:** The Registered Manager will review staff vacancy rates, time-to-fill, and turnover data

monthly to identify trends that may indicate issues with the attractiveness of roles, the quality of the recruitment process, or the retention of staff.

- **Exit interview analysis:** All departing employees will be offered an exit interview. Themes from exit interviews will be reviewed quarterly to identify recruitment, induction, or retention issues.
- **Annual policy review:** This policy will be reviewed at least annually by the Registered Manager to ensure continued compliance with legislation, CQC requirements, and best practice in safer recruitment.

8.2 Key Performance Indicators

| KPI | Frequency | Target |
|--|-----------------|---|
| DBS check compliance – all staff in regulated activity | Monthly | 100% of active staff with valid enhanced DBS on file |
| Reference completion rate before commencement | Per appointment | 100% – no exceptions |
| Right to work check completion rate | Monthly | 100% of employees with verified right to work on file |
| Safer recruitment training compliance | Quarterly | 100% of recruiting managers with current training |
| Induction completion rate within 4 weeks | Monthly | 100% of new starters completing induction on schedule |
| Staff turnover rate – annualised | Quarterly | Below sector average; year-on-year improvement |
| Vacancy rate | Monthly | Below 10% of establishment at any time |
| Lone working risk assessment currency | Quarterly | 100% of lone working roles with current, signed risk assessment |

9. Reporting Concerns

9.1 Concerns About a Candidate or New Starter

Any member of staff who has a concern about the suitability of a candidate or newly appointed staff member must report it to the Registered Manager immediately. Concerns that must be reported include new information about a candidate’s conduct or past employment that was not disclosed on the application form, concerns about a new starter’s conduct or attitude during induction, and any information suggesting that a candidate or employee may pose a risk to the individuals being supported.

9.2 Concerns About Recruitment Practice

Any concern about the fairness, legality, or integrity of the recruitment process, including concerns about discrimination, bias in shortlisting or interviewing, or failure to conduct required pre-employment checks, must be reported to the Registered Manager.

Where the concern involves the Registered Manager, it must be reported to the Directors or the Responsible Individual. External escalation to the CQC or the DBS is appropriate where an organisation fails to act on a concern about a barred or otherwise unsuitable person being employed in regulated activity.

9.3 Whistleblowing

operates a Whistleblowing Policy that provides full protection to any member of staff who raises a recruitment-related concern in good faith. Staff are encouraged to speak up without fear of detriment. Any act of retaliation against a member of staff who raises a legitimate recruitment concern will be treated as gross misconduct.

10. Staff Wellbeing

10.1 The Organisation's Approach to Staff Wellbeing

recognises that the wellbeing of its staff is directly and inseparably linked to the quality of care it delivers to the individuals it supports. Staff who are physically well, mentally resilient, and emotionally supported are better placed to deliver compassionate, consistent, and safe care. Conversely, staff who are exhausted, isolated, unsupported, or struggling with their mental health are at increased risk of making errors, disengaging from their work, and leaving the organisation.

Our approach to staff wellbeing is proactive, not reactive. We will not wait for a crisis to invest in the health and wellbeing of our team. Wellbeing support is embedded in the way we recruit, induct, supervise, and develop our staff, and in the culture we seek to create.

10.2 Physical Wellbeing

will take the following steps to protect and promote the physical health of all staff:

- **Manual handling:** All staff will receive manual handling training at induction and annually thereafter. Risk assessments for manual handling tasks will be maintained and reviewed regularly. Equipment and aids will be provided where required to reduce the risk of musculoskeletal injury.
- **Working hours:** The organisation will manage rotas and shift patterns in compliance with the Working Time Regulations 1998, ensuring that staff have adequate rest between shifts, sufficient annual leave, and protection from excessive working hours.
- **Personal Protective Equipment (PPE):** Appropriate PPE will be provided to all staff for tasks that require it, including personal care activities, medication handling, and any tasks involving exposure to bodily fluids.
- **First aid:** Adequate first aid provision will be maintained at all service locations. Staff who sustain injuries at work will have access to immediate first aid and will be supported to access further medical treatment where required.
- **Occupational health:** Where a member of staff has a health condition that affects their ability to work, the organisation will refer them to occupational health for assessment and advice on reasonable adjustments, phased return to work, or other supportive measures.

10.3 Mental Health and Emotional Wellbeing

Care work can be emotionally demanding. Supporting people through complex needs, health deterioration, bereavement, and

crisis, often on a lone basis, places real emotional demands on support workers. will actively address these demands through the following measures:

- **Regular supervision:** All staff will receive formal one-to-one supervision at least monthly, providing a protected space to discuss their wellbeing, raise concerns, and receive support from their line manager. Supervision is not solely a performance management tool; it is a genuine wellbeing and support mechanism.
- **Reflective practice:** Team meetings will include space for reflective practice, allowing staff to process difficult experiences, share learning, and support one another in a structured and facilitated way.
- **Mental Health First Aid:** The organisation will maintain at least one qualified Mental Health First Aider per service location, trained to identify early signs of mental health difficulties and provide initial support and signposting.
- **Employee Assistance Programme (EAP):** All staff will have access to a confidential Employee Assistance Programme providing counselling, financial advice, legal guidance, and wellbeing resources. EAP contact details will be provided at induction and communicated regularly to all staff.
- **Open door culture:** The Registered Manager will operate an open door approach, making themselves accessible to all staff who wish to discuss their wellbeing or raise a concern informally.
- **Wellbeing check-ins:** Duty Managers will conduct brief wellbeing check-ins with staff at the start of each shift, identifying any member of staff who is visibly distressed, unwell, or struggling, and taking appropriate action.

10.4 Wellbeing and Absence Management

will manage staff absence in a way that is supportive rather than punitive. Return-to-work interviews will be conducted following every period of absence, however brief, with the primary purpose of supporting the employee back into work and identifying any underlying wellbeing needs. Where absences are frequent or prolonged, the Registered Manager will explore the reasons sensitively and will implement a supported return-to-work plan where appropriate.

The organisation will monitor sickness absence data monthly as a governance indicator, recognising that high absence rates may signal systemic wellbeing or workload issues that require organisational rather than individual responses.

10.5 Wellbeing in the Context of Recruitment

Staff wellbeing begins at the point of recruitment. will incorporate the following wellbeing elements into its recruitment and selection practice:

- Job adverts will honestly and accurately describe the emotional and physical demands of roles in supported living, enabling candidates to make an informed decision about their suitability.
- The interview process will include discussion of the support available to staff, including supervision, EAP, and mental health first aid, so that candidates understand the organisation's commitment to their wellbeing before they accept a post.
- The induction programme will include a dedicated wellbeing session covering available support, how to recognise signs of stress or burnout, and how to raise wellbeing concerns.
- The probationary review process will include an explicit discussion of the new employee's wellbeing and experience of the organisation, and any concerns identified will be addressed promptly.

10.6 Organisational Responsibility for Wellbeing

Staff wellbeing is an organisational responsibility, not solely an individual one. It acknowledges that the causes of poor staff wellbeing are often systemic: unsafe staffing levels, inadequate training, poor communication, lack of recognition, and an absence of psychological safety. The organisation commits to:

- Maintaining safe staffing levels that allow staff to deliver care without being routinely overworked or under-supported.
- Acting on staff survey findings that identify wellbeing concerns, including concerns about workload, culture, or management behaviour.
- Recognising and celebrating good work, ensuring that staff feel valued and appreciated for their contribution.
- Creating an environment in which staff feel psychologically safe to make mistakes, ask for help, and challenge practices they are uncomfortable with.
- Ensuring that the language of wellbeing is not used to individualise or pathologise what are systemic issues, and taking organisational action where systemic causes are identified.

11. Lone Working

11.1 Definition and Scope of Lone Working at

Lone working arises in a variety of contexts within 's supported living services, including:

- Support workers providing one-to-one support in an individual's home during day, evening, or overnight shifts.
- Support workers accompanying individuals in the community, including during trips, appointments, and social activities.
- Staff conducting welfare checks or providing brief support visits to individuals at their home address.
- Staff travelling between service locations or to and from individual's homes during evening or early morning hours.
- Senior staff conducting unannounced quality or support visits to service locations without a colleague present.

will assess all roles for their lone working component and will ensure that appropriate risk management, training, and monitoring arrangements are in place before any member of staff undertakes lone working activity.

11.2 Lone Working Risk Assessment

A lone working risk assessment must be completed for every role that involves any element of lone working. The risk assessment will be carried out by the Health and Safety Officer () in consultation with the Registered Manager and will consider:

- The nature and frequency of lone working activities associated with the role.
- The environments in which lone working will take place, including the safety of the individual's home, the local area, and any travel routes.
- The specific characteristics and behaviours of the individual being supported, including any known risk factors such as a history of physical aggression, self-harm, substance use, or other behaviours that may affect the safety of lone workers.
- The time of day at which lone working takes place, with particular attention to out-of-hours risks.
- The availability of communication equipment and the reliability of mobile phone coverage in the relevant areas.

- The vulnerability of the staff member to specific risks, including any personal circumstances that may affect their safety.

Risk assessments must be reviewed at least annually, following any lone working incident, and whenever there is a significant change in the nature of the role, the individual's behaviour, or the working environment. All lone working risk assessments must be signed by the Registered Manager and the relevant member of staff.

11.3 Lone Working Protocols and Check-In Procedures

operates a mandatory lone worker check-in system for all staff engaged in lone working activity. The following requirements apply:

- **Before the lone working activity begins:** The staff member must notify the Duty Manager of their location, the individual they will be supporting, the anticipated duration of the activity, and their check-in schedule.
- **During the activity:** The staff member must check in with the Duty Manager at the intervals specified in their lone working plan. For standard lone working activities, check-ins will take place at least every two hours. For higher-risk activities, check-in intervals will be shorter as specified in the individual risk assessment.
- **At the end of the activity:** The staff member must contact the Duty Manager to confirm that they have concluded the lone working activity safely.
- **Missed check-ins:** Where a check-in is missed, the Duty Manager will attempt to contact the lone worker by telephone immediately. If the lone worker cannot be contacted within fifteen minutes of a missed check-in, the emergency response procedure will be initiated.

If a lone worker cannot be contacted within 15 minutes of a missed check-in, the Duty Manager must initiate the lone worker emergency response protocol immediately. This includes contacting the individual's household, attending the address, and, where there is genuine concern for the safety of the lone worker, contacting the emergency services.

11.4 Lone Worker Emergency Response Protocol

In the event that a lone worker cannot be contacted following a missed check-in, the Duty Manager will follow the steps below in order:

- Attempt to contact the lone worker by mobile phone. If no answer, send a text message and attempt a second call after five minutes.
- If still no contact after fifteen minutes, contact the individual or household where the lone worker is working to establish whether the lone worker is safe.
- If the lone worker cannot be located or if there is concern for their safety, notify the Registered Manager immediately.
- If there is credible reason to believe the lone worker may be at risk of harm, contact the police immediately and provide the lone worker's last known location and the reason for concern.
- Document all actions taken, times, and outcomes in the incident record.
- Complete an incident report and notify the Registered Manager and, where appropriate, the Health and Safety Officer, by the end of the shift.
- A debrief with the lone worker must take place as soon as they are confirmed safe, to provide support and to gather information about what occurred.

11.5 Lone Working Equipment and Technology

will ensure that all lone workers are equipped with appropriate tools to support their safety. This will include:

- **Mobile phone:** All lone workers will either use a personal mobile phone or be provided with an organisational device. Staff must ensure their mobile phone is fully charged before commencing any lone working activity.
- **Lone worker app or device:** Where operationally practicable, the organisation will provide or recommend a dedicated lone worker monitoring application. Such applications may include features such as timed alerts, panic buttons, GPS location tracking, and automated check-in reminders.
- **Personal alarm:** Where the lone working risk assessment identifies a higher level of personal safety risk, a personal alarm will be provided to the lone worker.
- **Emergency contacts card:** All lone workers will carry or have immediate access to a card listing the Duty Manager's number, the Registered Manager's number, and emergency services contact details.

11.6 Lone Working and the Individual Being Supported

Where lone working arrangements involve supporting an individual who poses a specific risk to lone workers, the following additional measures will apply:

- The individual's risk assessment must specifically address the risks to lone workers and identify control measures to reduce those risks.
- Staff must be briefed on the specific risks and control measures before working with the individual on a lone basis for the first time.
- Where the risk to lone workers is assessed as high, a lone working arrangement must not proceed without the approval of the Registered Manager and the implementation of agreed control measures.
- Where an incident involving a lone worker and an individual has occurred, the lone working and individual risk assessments must be reviewed before lone working arrangements with that individual are resumed.

11.7 Lone Working and New or Less Experienced Staff

New and less experienced staff are at greater risk when lone working, as they may be less confident in managing unexpected situations, less familiar with the individual they are supporting, and less aware of the organisation's escalation procedures. The following requirements apply to new starters:

- No new member of staff may work alone with an individual until they have completed the lone working induction, have been assessed as competent to work safely without direct supervision, and have been signed off by the Registered Manager or Duty Manager.
- During the probationary period, new starters should be accompanied by a more experienced colleague for at least the first two weeks of their role, particularly when working with individuals with complex or challenging needs.
- New starters must be explicitly informed of lone working protocols, emergency procedures, and their check-in responsibilities during their induction, and must sign to confirm they have understood them.

11.8 Lone Working and Staff Wellbeing

Lone working can contribute to feelings of isolation, stress, and anxiety, particularly for staff supporting individuals with complex needs or challenging behaviour. recognises this and will take the following steps to mitigate the wellbeing impact of lone working:

- Staff who work regularly on a lone basis will receive additional attention in supervision to explore their experience of lone working and to identify any emerging wellbeing or safety concerns.
- Lone workers will be encouraged to maintain regular contact with colleagues and managers and will not be left without access to peer support for extended periods.
- Where a lone worker has experienced a distressing or difficult incident, they will be offered a structured debrief and, where appropriate, access to the Employee Assistance Programme or other wellbeing support before returning to lone working duties.
- The organisation will monitor patterns of lone working incidents, near misses, and staff-reported concerns to identify any roles or service locations where lone working arrangements need to be reviewed.

12. Equality and Diversity in Recruitment

12.1 Equal Opportunities

is committed to ensuring that its recruitment and selection processes are free from discrimination, bias, and unfair advantage. The organisation will take active steps to ensure that:

- Job descriptions and person specifications do not include criteria that directly or indirectly discriminate against candidates with protected characteristics.
- Recruitment advertising reaches a diverse pool of candidates, including through targeted outreach to under-represented communities.
- Interview panels are, where possible, diverse in their composition to reduce the risk of unconscious bias in selection decisions.
- All shortlisting and selection decisions are documented and can be reviewed to identify any patterns of differential treatment.
- Reasonable adjustments are made at every stage of the recruitment process for candidates who disclose a disability or who require adjustments to participate fairly.

12.2 Positive Action

Where the organisation's equality monitoring data identifies under-representation of a particular group within the workforce, may take proportionate positive action under Section 159 of the Equality Act 2010 to encourage applications from that group. Positive action does not mean selecting a less qualified candidate on the basis of a protected characteristic; it means taking steps to ensure that the talent pool is as diverse as possible so that the best candidate can be selected on merit.

13. Related Policies

| Policy / Document | Relevance |
|---|--|
| Good Governance Policy | Recruitment compliance, DBS records, and workforce KPIs are governance indicators reviewed monthly. |
| Safeguarding Adults at Risk Policy | Safer recruitment is a core safeguarding mechanism. All recruitment decisions must be considered through a safeguarding lens. |
| Equality, Diversity, and Inclusion Policy | Equal opportunities in recruitment, positive action, and monitoring for discriminatory practice. |
| Health and Safety Policy | Lone working risk assessments, PPE provision, manual handling, and new and expectant mother risk assessments. |
| Supervision and Appraisal Policy | Supervision during probation, wellbeing discussions, and performance management for new starters. |
| Induction Policy | The induction programme is the bridge between recruitment and employment, embedding lone working and wellbeing awareness from day one. |
| Disciplinary and Grievance Policy | Governs the management of conduct or performance concerns identified during probation. |
| Information Governance and Data Protection Policy | Candidate data, DBS disclosures, and personnel records must be handled in compliance with UK GDPR. |
| Whistleblowing Policy | Staff may raise concerns about recruitment practice, unsuitable appointments, or lone working safety through the whistleblowing framework. |
| Incident Reporting and Management Policy | All lone working incidents, near misses, and wellbeing concerns must be reported and investigated through the incident management framework. |

Policy Approval & Review

| | |
|--------------------------------------|--|
| APPROVED BY Not Specified | SIGNATURE <i>No signature on file</i> |
| REVIEW DATE 1 January 1970 | NEXT REVIEW DATE 22 April 2027 |