

# Recruitment Policy and Procedures (Northern Ireland)

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# **Table of Contents**

lable of Contents	1
1. Introduction	2
2. Policy Statement	2
3. Scope	3
4. Definitions, Roles and Responsibilities	3
5. Procedures	4
5.1 Application	4
5.2 Interview	6
5.3 Pre- Employment Vetting and Compliance Checks	9
5.4 Identity Checks	10
Group 1: Primary Identity Documents	12
Group 2a: Trusted Government Documents	12
Group 2b: Financial and Social History documents	13
Proof of Name Change	14
5.5 Right to Work	15
5.6 Criminal Record Checks	15
5.7 References	16
5.8 Withdrawal of Offers	17
6. Recruitment of Ex-Offenders	17
7. Monitoring and Compliance	18
8. Policy Changes/Version History	19



#### 1. Introduction

Florence is committed to recruiting the best people to help drive the business forward, with both employees working centrally as well as care professionals on the Florence platform. The purpose of this recruitment policy is to ensure that Florence is able to attract and retain the best people to the business to enable Florence to achieve its aims and values while at the same time ensuring that a safe service is provided to the ultimate end user, the resident / patient.

## 2. Policy Statement

This policy establishes a comprehensive framework for recruitment and onboarding within our organisation, ensuring compliance with legal requirements for the regulated activities we are registered to provide.

Our recruitment process adheres to the principles of Safer Recruitment, Through Better Recruitment (2016) in order to:

- Fulfil legal and regulatory obligations
- Clearly communicate our commitment to the welfare of vulnerable individuals to potential applicants
- Thoroughly assess each candidate's suitability for the specific position
- Ensure, to the best of our ability, that candidates are safe to practise at each stage of recruitment and selection
- Select the most qualified candidates to progress based on merit at each stage of the process
- Verify the identity, qualifications, registration, and right to work status of candidates
- Involve service users in the recruitment and selection process
- Comply fully with the Code of Practice issued by the Department of Justice
  for the use of information provided by AccessNI, in accordance with the
  Police Act 1997, to assess the suitability of applicants for employment,
  voluntary positions, licensing, and other relevant purposes. We are
  committed to treating all applicants fairly and ensuring that no unfair or
  unlawful discrimination occurs based on convictions or other disclosed
  information.
- This policy is available to all Disclosure applicants at the beginning of the recruitment process.



 We actively promote equality of opportunity, valuing a diverse range of candidates, including those with criminal records. The selection of candidates for interview will be based on meeting the required standards of skills, qualifications, and experience outlined in the essential and desirable criteria.

## 3. Scope

This policy applies to all individuals applying to join the Florence Flex platform and those applying to work centrally as part of the Florence Central team.

## 4. Definitions, Roles and Responsibilities

**Branch Nurse** – is the individual who makes the decisions around suitability of the Registered Nurse candidate for the role

**Candidate, individual** – a person who has applied for a role, this may be an existing employee or an external applicant.

**Care Professionals** - Anyone on the Florence platform that carries out work on behalf of Florence in other organisations, for example registered nurses and care assistants

**Central Team** - All direct employees of Florence that are not working as care professionals on the Florence platform

**CEO (Chief Executive Officer)** The CEO is ultimately responsible for the overall management and direction of the company. The CEO has the ultimate responsibility for setting the tone and culture for the organisation, ensuring that all employees understand the policy's importance, and overseeing its implementation.

**Chief Operating Officer (COO)** in conjunction with the has overall responsibility for risk management within the Company.

**Customer Success Executives** are responsible for ensuring that the applicants are of a required standard and that the interviews are conducted in accordance with the Florence requirements.

Florence Flex - The Company platform.



**Northern Ireland Social Care Council (NISCC)** - is the regulator responsible for raising the standards in Social Work and Social Care in Northern Ireland.

**Registered Manager** for Northern Ireland is responsible for overseeing the recruitment and selection process in Northern Ireland.

**Regulation and Quality Improvement Authority (RQIA)** - is the independent body responsible for monitoring and inspecting the availability and quality of health and social care services in Northern Ireland, and encouraging improvements in the quality of those services.

**Service User** - a person who uses health and/or social care services. Sometimes known as a "patient", "client" or "person in care"...

**Share Code** -is a code that potential users can provide to their employers to demonstrate their right to work status.

**The Operation Team** is responsible for carrying out the day to day operation of this policy.

**The Governance Team** is responsible for monitoring and inspecting via ongoing audits the availability and quality of compliance obtained across the organisation, and encouraging improvements in the quality of the services we provide.

#### 5. Procedures

#### 5.1 Application

Candidates can apply to work on the Florence Flex platform by registering at:

https://www.Florence.co.uk/care-professionals/flex and completing the initial registration form.

Florence will accept a registration from registered nurses or care assistants to the Florence Flex platform who can comply with the compliance onboarding requirements as follows:

- Full name (forenames and last name, as listed in the relevant Professional body's register) and any previous names or other names by such the Candidate may be known.
- Current residential address and other active contact details.



- Date of birth.
- Next of kin, together with an active emergency contact telephone number.
- Full employment history and training including any periods not in employment, education or training (with no unexplained gaps). Where the applicant has studied outside of Northern Ireland and the leaving age of full time education is beyond 18 years of age, this should be reflected in the interview notes as a record. Where there are gaps in employment and the applicant is/was not in full time education, a written statement is required from the applicant explaining these gaps fully.
- Professional membership registration details.
- Details of qualifications achieved, and training courses attended (including post graduate academic and vocational training).
- Employer reference details.
- Details of any disciplinary or grievance procedures and any "live" formal warnings.
- Declarations regarding spent convictions (on the list of offences that must always be disclosed), unspent criminal convictions, consent for safeguarding and employment checks to be carried out, data protection disclaimer, fullness and accuracy of information provided. Applicants are advised that failure to disclose important information may lead to termination of the assignment or dismissal should it come to light at a later date.
- Valid NMC PIN (Nurses only) Identification of restrictions to practise noted on the NMC check and any ongoing investigations will be recorded on the applicants file, along with the decision to offer employment or not. The Head of Nursing and Governance will make the decision around suitability for appointment to the role if restrictions or investigation processes are noted on the applicant's NMC PIN check. Support will be offered to the applicant where it is agreed that their application can progress.
- Valid NISCC Registration for care assistants
- At least 1 year of verified Nursing experience, not limited to UK experience required.
- For care assistants, six months minimum UK verified care work experience is required.
- A Valid AccessNI (Northern Ireland)
- We require an overseas police check if:



- The candidate has resided outside the UK for more than 3 months in the last 5 years and Florence is their first employer since arriving.
- The candidate has had previous care jobs in the UK but has been overseas for more than 3 months in the last 5 years and Florence is now their first employer since returning.
- In cases where the candidate has already undergone police checks through the Home Office (for visas) or the NMC (for nurses), we will rely on those existing checks.
- Up to date training certificates (in line with Florence schedule of Statutory and Mandatory Training Policy and Procedure)
- Evidence of English Language proficiency (where applicable)
- Three forms of ID are required including; Passport / biometric ID card/ proof of address and recent photograph.
- Nurses and care assistants can only register with Florence as a PAYE worker.

The information provided on the application form is cross referenced with other documentation and checks to ensure fullness and accuracy of data provided.

Please note that for workers employed by the NHS who are unable to provide updated training certificates, we will accept written confirmation from their line manager or training manager. This confirmation must be provided on official NHS/Trust paper and from an NHS/Trust email address. The confirmation should include:

- The name of the course
- Whether the course was practical or theoretical
- The date the course was completed

#### 5.2 Interview

All candidates are sent an invite to complete a Willo interview at their own convenience. This is a video recorded interview with set questions and completed online. Nurses will also complete a face-to-face interview as detailed in the following section.



Nurses are asked the following questions in the Willo interview: their NMC pin and year obtained, when they qualified as a Nurse, previous employment history, when their revalidation is due and the value of revalidation.

Willo interviews also allow Florence the onboarding team to review candidate's understanding and comprehension of English language.

At the end of all Willo interviews, all candidates take part in an Identity Check and Right to Work check.

Following the Willo interview, nurses are invited to attend a face to face interview with the Registered Manager.

#### **Interview Procedure for Nurses**

Sufficient notice will be given to the candidate invited to interview (where applicable). When arranging the interview, recruiting individuals will request to see original identification (ID) as a form of identification. A copy will be made available to the interviewer for verification purposes and a copy will also be held on the candidate's personnel file. Examples of acceptable ID include:

- Passport
- Driver's Licence (Full or Provisional)
- Biometric Residence Permit (BRP)
- National Identity Card for a country outside the EEA
- Birth Certificate
- Adoption certificate
- Marriage or civil partnership certificate

Applicants must also provide a copy of proof of current address. The proof of address must be no more than 3 months old, although the driving licence can be older. The same document cannot be used for both date of birth and address, examples of this can include:

- Utility bill, such as gas, electric or phone bill
- Council tax bill or letter
- Driving licence photocard (full or provisional)
- Bank or credit card statement
- Mortgage statement



- Tenancy agreement (typed, not handwritten)
- Insurance policy document or letter
- Pay slip or P60
- UK hospital or doctor's letter
- UK TV Licence
- University, college or school letter
- UK Electoral Register Office letter or UK polling card
- Home Office letter
- UK firearm or shotgun certificate
- UK solicitor's letter on headed paper

For unsuccessful candidates, copies of any information held will be retained and destroyed in line with the retention schedule within the Data Protection and Records Management Policy.

#### **During the Interview**

Prior to the interview, all recruitment requirements have been checked by the Recruitment Team.

Our interview process provides us with an opportunity to explore each applicant's suitability and competencies for employment/assignment with the Service. All applicants attend an interview in person with a Clinical Manager (at Band 6 equivalent or above) who is aligned to their specialist field, actively registered with the NMC.

The interview is recorded using our structured interview form to ensure consistency and this is retained on file. We retain details of the date and location of the interview, name of the interviewer and evidence of the questions asked together with candidate responses.

#### **Interview Procedure for Care Assistants**

Care assistants complete a digital application form, video recorded online. These recorded applications consist of explaining work history, what care settings they have previously worked in, as well as a variety of care scenario-based questions, including moving and handling and safeguarding/adult protection, which allows us to judge their competency.



During the application we ask in-depth and structured biographical questions about the applicant's education, qualifications and work experience (full reverse chronological history) and establish their aspirations/reasons for applying for the specific role. Past behaviour is a strong indicator of future behaviour, so competency-based questions are also asked to establish evidence of the skills and care/clinical experience required to be successful in the role. During this stage of the application we probe into the candidate's skills and aptitude to establish the cultural fit with the organisation and role. An assessment is also made of the candidate's personality traits, communication skills, attitude, ethics, approach and general demeanour.

After the application, we provide a full briefing on the job. It is essential that the candidate is interested in the role and they understand how it may or may not lead to progression within the business in the future. Achieving a cultural fit is crucial when matching candidates to the role, leading to greater longevity and performance and saving the Client time and money.

Finally, we scan the responses provided in both the initial screening and face-to-face interview stages for any missing information and where insufficient detail has been provided we probe more deeply to develop the candidate's responses and fill in any gaps. This ensures we have a full insight into the candidate's history, capability, reliability, commitment and aspirations.

#### **Post Interview**

Following each interview, all candidate applications should be reviewed to critically question all reasons for rejection and acceptance, with no discrimination. The Registered Manager will make the final decision to reject candidates on the basis of interview performance.

Records may be retained in case of a recruitment complaint, discrimination challenge, or to assist in the assessment of ways to improve the recruitment process for future vacancies. All retained records should be held in line with the retention schedule within the Data Protection and Records Management Policy. For all accepted candidates, they will be advised of this by the interviewee where appropriate; offering them the post.



A rejection or holding email must be completed for every unsuccessful candidate, as appropriate and the opportunity to provide feedback offered.

### 5.3 Pre- Employment Vetting and Compliance Checks

We undertake the following pre-employment vetting and checks in line with RQIA minimum standards and our own documented policies including verification of:

- **Identity** two forms of photographic ID and one document confirming the candidate's address; or one form of photographic ID and two documents confirming their address. We also require them to provide us with a clear, recent electronic photograph of themselves (updated every five years) (see section 5.4)
- Address the candidate will be required to provide two documents to prove their address which are dated within the last 3 months. Acceptable documents include utility bills, bank statements, firearms licence, mortgage statements, credit card statements etc).
- Right to work where we validate relevant original documentation from List
   A or List B provided by the home office. All documentation is checked to
   confirm it relates directly to the candidate, is current and in date, confirms
   permission to do the type of work being applied for, has not been tampered
   with and would be difficult to forge. Florence Flex will restrict any candidate
   from working past their Right to Work expiry date. (see section 5.5)

#### • Professional registration and qualifications

- Care professionals will be required to provide their registration number for us to check their registration with the NMC/NISCC (as appropriate).
- o We request a Statement of Entry from nurses, rather than their original qualification document. We do this because the NMC conducts its own thorough checks and requires proof of qualifications before registering a nurse.
- o We use the Statement of Entry to continually review the revalidation application date for the given nurse's NMC pin, and renewal date.
- Criminal record and barring we obtain an enhanced AccessNI check and check of the adults and children's barred lists for all care professionals prior to assignment in alignment with our Criminal Record and Barring



Procedure. AccessNI certificates have security features to verify if they have been counterfeited or altered in any way. If the candidate has been out of the country for six months or more during the last five years, we will also require an overseas police check. (see section 5.6)

• **References** we will obtain Two (2) satisfactory evidence of conduct in any previous employment where the user worked in health or social care. One being from the most recent employer. (see section 5.7)

#### **5.4 Identity Checks**

Identity checks are carried out via Willo, powered by Yoti.

They consist of the candidate taking pictures of themselves holding their ID document, which Yoti/Willo processes to ensure it is the correct person.

Willo provides an Identity check report breakdown for us to review, along with their recommendation to approve or reject based on the information supplied.

We cross-check that the person that completed the ID check matches the image on the Right to Work sharecode check/ID document and the profile picture provided

All applicants must provide a minimum of 3 documents and the documents must be original not copies. Applicants can follow one of two routes:-

#### Route 1

Applicants must provide:-

- 1 document from Group 1; and
- 2 further documents from Group 1 or 2a or Group 2b

At least one of the documents must show the applicant's current address.

#### Route 2

This applies only where an applicant does not have Group 1 documentation. Applicant must provide:-

• 4 documents from Group 2a and 2b



One document must be a birth certificate issued after the time of birth. One document must show the applicant's current address

A Signatory is required, in addition to checking the applicant's identity documents, to confirm Florence has checked the individual has a right to work in the UK. A link to Right to Work has been provided below:-

Checking a job applicant's right to work - GOV.UK

For applicants who are not UK or Irish nationals please refer to the appropriate sections of the 'Guide to identity checking for AccessNI applications'.

AccessNI applications - identity checking

**Group 1: Primary Identity Documents** 

Document	Notes
Passport	Any current and valid passport
Biometric Residence Permit	UK
Current Driving Licence photocard (full or provisional)	UK, Isle of Man, Channel Islands or Ireland
Birth Certificate issued within 12 months of birth	UK, Isle of Man and Channel Islands - including those issued by UK authorities overseas, for example embassies, High Commissions and HM Forces
Long form Irish birth certificate issued at time of registration of birth	Ireland
Adoption certificate	UK, Channel Islands or Ireland

**Group 2a: Trusted Government Documents** 

Document	Notes
Birth certificate issued after time of birth	UK, Isle of Man, Channel Islands or Ireland



Marriage / Civil Partnership certificate	UK, Channel Islands or Ireland
HM Forces ID card	UK
Firearms licence	UK, Channel Islands and Isle of Man
Electoral ID card	Northern Ireland only
Current driving licence photocard (full or provisional)	All countries outside the UK (excluding Isle of Man and Channel Islands)
Current driving licence (full or provisional) - paper version (if issued before 1998)	UK, Isle of Man, Channel Islands and Ireland
Immigration document, visa or work permit	Issued by a country outside the UK. Valid only for roles whereby the applicant is living and working outside of the UK. Visa/permit must relate to the country in which the role is based.

## **Group 2b: Financial and Social History documents**

Document	Notes	Issue date / validity
Mortgage Statement	UK or Ireland	Within last 12 months
Financial statement, for example ISA, pension or endowment	UK or Ireland	Within last 12 months
P45 or P60 statement	UK or Channel Islands	Within last 12 months
Land and Property Services rates demand	Northern Ireland only	Within last 12 months
Council tax statement	UK or Channel Islands	Within last 12 months
Credit card statement	UK or Ireland	Within last 3 months
Bank or Building society statement	UK, Channel Islands or Ireland	Within last 3 months
Bank or Building society	Countries outside the UK	Within the last 3 months



statement		- branch must be in the country where the applicant lives and works
Bank or building society account opening confirmation letter	UK	Within last 3 months
Utility bill (not mobile phone)	UK or Ireland	Within last 3 months
Benefit statement, for example Child Benefit, Pension etc.	UK	Within last 3 months
Central or local government, government agency, or local council document giving entitlement, for example from the Department for Work and Pensions, the Employment Service, HMRC	UK and Channel Islands	Within last 3 months
EEA National ID card		Must be valid
60+ or Senior (65+) SmartPass issued by Translink	Northern Ireland only	Must be valid
yLink card issued by Translink	Northern Ireland only	Must be valid
Cards carrying the PASS accreditation logo	UK, Isle of Man and Channel Islands	Must be valid
Letter from head teacher or further education college principal	UK - for 16 to 19 year olds in full time education - only used in exceptional circumstances if other documents cannot be	Must be valid



	provided	
Letter of sponsorship from future employment provider or voluntary organisation	Non UK only - Valid only for applicants residing outside UK and Ireland at time of application	Must be valid
Irish Passport Card	Cannot be used with an Irish passport	Must be valid

#### **Proof of Name Change**

In the instances where a candidate has documents in different names, for example, through marriage, divorce, religious or professional reasons or they may prefer to be known by their middle name. Individuals may choose to change their name at any time and be known by this name without going through any legal process.

Any such information must be matched with supporting documentary evidence that recognises the name change. For example, this might include but is not exclusive to:

- A marriage or civil partnership certificate
- A decree absolute/civil partnership dissolution certificate
- A deed poll certificate
- A recognition certificate

#### 5.5 Right to Work

Right to Work checks are carried out via Willo and the Government Sharecode Checking service.

UK nationals provide their passport, or Birth Certificate & Proof of NI during their Willo Identity Check, which also checks their Right to Work using Yoti.

Non-UK Nationals provide their sharecode, which is then checked via the Gov sharecode checking service to ensure their Right To Work is valid.

If on a restricted visa (Student or Sponsorship), the additional supporting documents are requested by the recruitment team (Student - enrolment letter &



course term dates; Sponsorship - Certificate of Sponsorship to check their occupational code).

Right to Work is cross checked for Identity against their Identity check from Willo, and the picture they have supplied Florence

#### 5.6 Criminal Record Checks

Criminal records checks will be made prior to accepting the candidate . as outlined in section 8 in relation to Access NI (where applicable).

Where criminal conviction information is provided on the AccessNI scheme record or disclosure certificate it is important to obtain further details from the applicant.

Criminal Records information should be assessed on an individual basis with specific reference to the tasks and responsibilities of the job. This will assist in determining whether the applicant is suitable for the post.

The Registered Manager for the service should agree on the decision to employ or not to employ following the review of the additional information. The information is recorded and retained within the applicants file and this is stored in line with the Records Retention Schedule detailed in (Data Protection and Records Management Policy) and Risk Assessment created. Risk assessments to be signed off by the Registered Manager.

Rehabilitation of Offenders Act helps rehabilitated ex-offenders back into work by allowing them not to declare criminal convictions to employers after the rehabilitation period has elapsed and convictions become "spent" (old). During the rehabilitation period, convictions are referred to as "unspent" (current) convictions and must be declared to employers within the registration process.

#### 5.7 References

Florence must ensure that any person employed is fit and proper to work, according to RQIA requirements.

Florence must obtain Two (2) satisfactory evidence of conduct in any previous employment where the user worked within health or social care. One being from the most recent employer.

All written employment reference will include 1 or more of the following:

- Simple employment reference
- Dates of employment in mm/yyyy format
- Professional competence and personal qualities; and



 be obtained from the employer's business address of the identified named referee;

We will validate reference through 1 or more of the following:

- Company stamp on the reference
- NMC Pin (if applicable)
- Headed paper signed and dated by the referee where a company email is not available - ie from an organisation outside of the EU.
- Compliment slip signed and dated by the referee
- From the business email address of the referee
- Verbal references can be taken over the phone and then sent to the referee to verify with the above means
- Where overseas references are provided without a company email address, this is validated through confirmation of digital footprint as well as headed paper.

If there's information which Florence can't gather or any issues of concern raised in the references obtained, we will conduct a risk assessment detailing the steps taken to gather all appropriate information, and what they have in place to mitigate any missing information.

Any current disciplinary investigation and/or sanction; Any allegations and/or disciplinary investigations relating to the safety or welfare of children and/or vulnerable adults and the outcome of these (including where any sanction has expired).

Details of any criminal convictions, cautions, warnings or reprimands; If the referee would re-employ the applicant and, if not details of why.

References obtain from the following person(s) can be accepted:

- HR departments,
- Relevant personnel functions in organisations,
- A colleague of a higher band,
- Manager
- Supervisor.

#### 5.8 Withdrawal of Offers

If, after careful consideration, it is decided to withdraw the conditional offer of employment, the grounds for withdrawal must be very clear, e.g. due to



unsatisfactory references or other employment checks and the offer of employment rescinded in writing. This decision must be made in conjunction with the Registered Manager or other members of the senior management team for Florence where required.

It must be clearly documented in the candidates file if there has been a decision to withdraw the offer of employment. This should record the reasons for the decision, the decision making process and the names of those involved in the process.

#### 6. Recruitment of Ex-Offenders

We will request an AccessNI Disclosure only where this is considered proportionate and relevant to the particular position, all care professionals will be subject to AccessNI Disclosure check, however central team roles will be risk assessed, having considered the relevant legislation which determines whether or not a Standard or Enhanced Disclosure is available to the position in question.

Where an AccessNI Disclosure is deemed necessary for a post or position, all applicants will be made aware at the initial recruitment stage that the position will be subject to a Disclosure and that Florence will request the individual being offered the position to undergo an appropriate AccessNI Disclosure check

In line with the Rehabilitation of Offenders (Exceptions) (Northern Ireland) Order 1979 (as amended in 2014), Florence will only ask about convictions which are defined as "not protected" for the purposes of obtaining a Standard or Enhanced disclosure.

We undertake to ensure an open and measured and recorded discussion on the subject of any offences or other matters that might be considered relevant for the position concerned eg the individual is applying for a driving job but has a criminal history of driving offences. Failure to reveal information that is directly relevant to the position sought could lead to withdrawal of the conditional offer of employment.

Florence may consider discussing any matter revealed in a Disclosure Certificate.

We ensure that the Florence central team who are involved in the recruitment process have been suitably trained to identify and assess the relevance and circumstances of Disclosure information. We also ensure that they have received appropriate guidance and training in the relevant legislation relating to



employment of ex-offenders (e.g. the Rehabilitation of Offenders Northern Ireland) Order 1978).

We undertake to make every subject of an AccessNI Disclosure aware of the existence of the Code of Practice, and to make a copy available on request.

Having a criminal record will not necessarily prevent applicants from working with Florence. The decision will depend on the nature of the position, as well as the circumstances and background of the offences or other information disclosed on a certificate.

## 7. Monitoring and Compliance

The Registered Manager is responsible for ensuring the ongoing relevance of this policy and for the addition of legislative changes as they occur.

This policy will be routinely reviewed every 3 years by the Registered Manager, or earlier if there are any changes in legislation.

# 8. Policy Changes/Version History

Date	Reviewed changes
24/01/24	Section 5.1 Chief Nurse replaced with Head of Nursing and Governance in relation to NMC pin checks.
05/02/2024	Policy statement amended, Section 6 - Recruitment of Ex-offenders added & Section 5.4 identity checks amended to meet requirements of accessN.I.
01/05/24	Section 5.1 amended to include detail around explaining employment gaps since leaving full time education (aged 18).
02/09/24	Registered manager name change

