CONTROLLED POLICY

C01 – RECRUITMENT, SELECTION AND SAFER EMPLOYMENT POLICY

Policy Reference	C01	**Version**	1.0
Policy Owner	PHSSL Staffing Limited	**Approved By**	Lade Awosika, Director
Approval Method	Approved electronically	**Approval Date**	September 2026
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Applies To	All PHSSL Staffing Limited recruitment, compliance and management staff	**Supersedes**	New policy

1. Purpose

PHSSL Staffing Limited is committed to fair, lawful and safer recruitment. This policy establishes the controls used to recruit, assess, vet and select suitable people for temporary assignments and permanent placements while protecting candidates, clients and people who may receive services from supplied workers.

2. Scope

This policy applies to recruitment, selection and pre-placement activity undertaken by PHSSL Staffing Limited as an employment business supplying temporary workers and, where applicable, as an employment agency introducing candidates for permanent employment. It applies to directors, recruiters, compliance staff, administrators and managers involved in recruitment decisions.

3. Core Principles

- Recruitment decisions will be based on role requirements, suitability, competence and lawful selection criteria.
- PHSSL will not unlawfully discriminate against candidates or workers.
- Safer-recruitment checks will be proportionate to the role and completed before supply where required.
- Candidate information will be accurate, verified where necessary and handled confidentially.
- PHSSL will not knowingly supply a person who is unsuitable, barred from regulated activity, lacks required permission to work, or fails a mandatory client or legal requirement.
- Recruitment records and decisions will provide a clear audit trail.

4. Regulatory Framework

- Employment Agencies Act 1973.
- Conduct of Employment Agencies and Employment Businesses Regulations 2003, as amended.
- Agency Workers Regulations 2010 where applicable.
- Equality Act 2010.
- Immigration, Asylum and Nationality Act 2006 and current Home Office right-to-work requirements.
- Safeguarding Vulnerable Groups Act 2006 and applicable Disclosure and Barring Service requirements.
- Data Protection Act 2018 and UK GDPR.
- Rehabilitation of Offenders Act 1974 and applicable exceptions.
- Role-specific professional, safeguarding, health, social care, education or client requirements where applicable.

5. Employment Business and Employment Agency Roles

For temporary supply, PHSSL generally operates as an employment business and engages work-seekers for assignments with hirers. For permanent introductions, PHSSL may operate as an employment agency. Staff must use the correct contractual and compliance process for the service being provided and must not blur the legal responsibilities of PHSSL, the hirer and the work-seeker.

6. Workforce Planning and Role Requirements

Before recruiting or supplying a worker, PHSSL will obtain sufficient information about the role or assignment to assess suitability. This may include the hirer's identity, location, role, duties, required experience, qualifications, working hours, health and safety risks, safeguarding requirements, professional registration, checks required by law and any other material conditions.

7. Advertising

- Advertisements must be accurate and must not materially mislead candidates.
- Job titles, duties and essential requirements should reflect the actual opportunity.
- Advertisements must not contain unlawfully discriminatory criteria.
- Where pay or rates are stated, they must be presented accurately and with appropriate explanation.
- PHSSL must not advertise an assignment or vacancy that it knows does not exist merely to collect candidate details.

8. Applications and Registration

Candidates may be asked to complete an application or registration process and provide information relevant to the role. PHSSL will explain how personal information is used and will collect only information reasonably required for recruitment, compliance, work-finding, payroll or legal purposes.

9. Identity Verification

PHSSL will take reasonable steps to verify the identity of candidates before supply. Identity evidence must be checked carefully and consistently. Where digital verification or other approved technology is used, staff must follow the applicable process and retain appropriate evidence.

10. Right to Work

PHSSL will carry out the right-to-work check required for the contractual arrangement before the worker starts work and will complete follow-up checks where required for time-limited permission. Checks must follow the Home Office requirements in force at the time. Candidates must not be treated less favourably because of nationality, accent, ethnicity or perceived immigration status.

11. Employment History and Gaps

Candidates for roles requiring safer recruitment will be asked for an appropriate employment and activity history. Material gaps, inconsistencies or unexplained periods will be explored proportionately. Explanations and any risk assessment or management decision should be recorded.

12. References

PHSSL will obtain and verify references appropriate to the role and client requirements. References should be sought from suitable sources and assessed for consistency with the application, employment history and other information. Any material discrepancy, concern or inability to obtain a required reference must be escalated and resolved or risk-assessed before placement.

13. Qualifications, Skills and Competence

- Required qualifications and certificates will be checked for relevance and apparent authenticity.
- Professional registration will be verified directly through the appropriate register where required.
- Training and competency evidence will be checked against assignment requirements.
- Expiry dates will be monitored where relevant.
- A candidate must not be represented to a client as holding a qualification, registration or competency that PHSSL has not appropriately verified.

14. DBS and Criminal Record Checks

Where a role is eligible for a DBS check, PHSSL will ensure the appropriate level of check is obtained or verified in accordance with law, DBS requirements and client needs. Criminal-record information will be handled securely and fairly. A disclosed conviction or other information will not automatically exclude a person unless the law requires exclusion or a documented suitability assessment identifies unacceptable risk.

15. Barred List and Regulated Activity

Where a role constitutes regulated activity and a barred-list check is legally permitted and required, PHSSL will ensure the appropriate check is completed. PHSSL will not knowingly allow a barred person to engage in regulated activity from which they are barred.

16. Health and Fitness

Any health information requested must be lawful, necessary and relevant to the role. PHSSL will consider reasonable adjustments and will not unlawfully discriminate because of disability or health status. Where occupational-health or fitness evidence is required for a role, it will be handled confidentially.

17. Interview and Assessment

Selection methods should be proportionate to the role and may include interview, competency questions, document verification, skills assessment and scenario-based discussion. For safeguarding-sensitive roles, assessment should explore professional boundaries, safeguarding awareness, reporting responsibilities and safe practice.

18. Equality, Diversity and Fair Selection

Candidates will be assessed against objective and relevant criteria. PHSSL will make reasonable adjustments to recruitment processes where required and practicable. Equality-monitoring information, where collected, should be separated from selection decisions as far as practicable.

19. Candidate Suitability

Before supply, PHSSL will consider whether the candidate has the experience, training, qualifications, authorisations and personal suitability required for the assignment. Suitability decisions must take account of information supplied by the hirer and any statutory or safeguarding requirements.

20. Information From Hirers

PHSSL will obtain the information required to understand an assignment and protect both the work-seeker and hirer. Relevant information will be passed to the work-seeker before the assignment in accordance with applicable Conduct Regulations requirements. Staff must clarify incomplete or inconsistent assignment information before supply.

21. Terms and Key Information

PHSSL will provide work-seekers with applicable terms of engagement before providing work-finding services and will provide agency workers with a Key Information Document where legally required. Material changes will be communicated and documented in accordance with applicable requirements.

22. Candidate Consent and Representation

PHSSL will not misrepresent a candidate's experience, availability, qualifications or suitability. Candidate details should only be submitted or disclosed to hirers where there is a lawful basis and the candidate has been appropriately informed. Sensitive personal information must not be routinely shared where a confirmation of compliance is sufficient.

23. Pre-Placement Compliance Clearance

No worker may be marked as fully compliant or released for an assignment until mandatory checks for that role have been satisfactorily completed, verified and recorded. Any exception must be lawful, genuinely permissible for the role and explicitly authorised by an appropriate manager with a documented rationale.

24. Additional Checks for Health, Care and Education Roles

Where workers are supplied into health, social care, education or other safeguarding-sensitive environments, PHSSL will apply the enhanced checks required by law, the role and the hirer. These may include DBS status, barred-list eligibility, professional registration, safeguarding training, mandatory training, employment history, references, competency evidence and role-specific health requirements.

25. Professional Registration

For registered professionals, PHSSL will verify current registration and any relevant restrictions or conditions before supply and at appropriate intervals thereafter. A worker must not be supplied in a capacity requiring registration if the registration is absent, expired, suspended or otherwise incompatible with the assignment.

26. Fraud, False Documents and Inconsistencies

Suspected falsification, impersonation or fraudulent documents must be escalated immediately. PHSSL may suspend the recruitment process while checks are completed. Where necessary and lawful, the matter may be referred to the hirer, police, DBS, professional regulator, Home Office or another competent authority.

27. Recruitment Fees and Improper Charges

PHSSL will comply with legal restrictions on charging work-seekers for work-finding services. Optional goods or services must not be made an improper condition of finding work, and any lawful charges must be clearly explained in accordance with applicable requirements.

28. Offers and Assignment Confirmation

Offers, introductions and assignment confirmations must accurately reflect the agreed role, status and relevant conditions. For temporary assignments, workers will receive the required assignment information before starting work, including information necessary to understand the hirer, duties, location, hours, risks, required experience or qualifications and remuneration arrangements.

29. Candidate Records

Recruitment records will be accurate, secure and retained in accordance with PHSSL's Records Management, Confidentiality and Data Protection Policy and applicable legal requirements. Access to sensitive compliance records will be restricted to authorised persons.

30. Ongoing Compliance

Safer recruitment does not end at initial placement. PHSSL will monitor time-limited right-to-work status, professional registration, training, DBS arrangements where relevant, qualifications or other compliance items that require renewal. Workers must inform PHSSL promptly of material changes affecting their eligibility or suitability.

31. Concerns Identified After Placement

If information arises after placement that may affect suitability, PHSSL will assess the risk promptly and may suspend or remove the worker from assignments while enquiries are made. Safeguarding, client notification, DBS referral, professional-regulator notification, disciplinary or other action will be considered where applicable.

32. Recruitment Staff Responsibilities

- Follow approved recruitment and compliance processes consistently.
- Verify required evidence rather than relying solely on candidate statements.
- Record checks, discrepancies and decisions accurately.
- Do not bypass mandatory checks to fill an urgent booking.
- Escalate safeguarding, fraud, right-to-work or suitability concerns.
- Protect candidate confidentiality and avoid discriminatory decision-making.
- Keep knowledge of recruitment law and PHSSL procedures up to date.

33. Management Responsibilities

- Maintain effective safer-recruitment systems and audit controls.
- Ensure recruiters and compliance staff are trained and competent.
- Approve and document exceptional or higher-risk decisions where lawful.
- Monitor expiry dates and compliance gaps.
- Investigate significant recruitment failures and implement corrective action.
- Review legal and regulatory updates, including guidance from the Fair Work Agency and Home Office.

34. Related PHSSL Staffing Policies

- A01 Governance and Quality Assurance Policy.
- A03 Records Management, Confidentiality and Data Protection Policy.

- B01 Safeguarding Adults Policy.
- B02 Safeguarding Children and Young People Policy.
- B03 Whistleblowing / Speaking Up Policy.
- C02 DBS, Right to Work, References and Pre-Employment Checks Policy.
- C06 Lone Working and Worker Safety Policy.
- D01 Temporary Worker / Agency Worker Management Policy.
- D03 Placement, Booking, Allocation and Cancellation Policy.

35. Monitoring and Review

Recruitment and safer-employment compliance will be monitored through candidate-file audits, expiry monitoring, incident and safeguarding reviews, client feedback, worker feedback and governance processes. This controlled policy will be reviewed at least annually, or sooner following significant legal or regulatory change, a serious recruitment failure, audit findings or identified learning.

Approved by	Lade Awosika
Position	Director
Approval method	Approved electronically
Approval date / next review	September 2026 / September 2027