

## Annual Compliance Maintenance Policy

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### Compliance Policies and procedures

#### I. Policy

It has been and continues to be the policy of Major Healthcare of part of the Major Recruitment Group to comply with all applicable CQC and Ofsted legal requirements regarding safer recruitment and compliance.

#### II. Commitment

We have always been and remain committed to our responsibility to conduct our business affairs with integrity based on sound ethical and moral standards. We will hold our employees to the same standards. Major Healthcare is committed to maintaining and measuring the effectiveness of our Compliance policies and standards through monitoring and auditing systems reasonably designed to detect noncompliance by its employees. We shall require the performance of regular, periodic compliance audits by internal and/or external auditors.

#### III. Responsibility

All employees will acknowledge that it is their responsibility to report any suspected instances of suspected or known non-compliance to Beverley Caslin Major Healthcare Compliance Manager or a member of the Temp team for Major Healthcare. Reports may be made anonymously without fear of retaliation or retribution. Failure to report known non-compliance or making reports which are not in good faith will be grounds for disciplinary action, up to and including termination.

#### IV. Policies and Procedures

Major Healthcare will communicate its compliance standards and policies through required training initiatives to all employees and agents. We are committed to these efforts through distribution of this Compliance Policy and our Code of Conduct.

#### V. Enforcement

This Compliance Policy will be consistently enforced through appropriate disciplinary mechanisms including, if appropriate, discipline of individuals responsible for failure to detect and/or report noncompliance.

#### VI. Due Diligence

Major Healthcare will, at all times, exercise due diligence with regard to background and professional license investigations for all prospective employees.

### COMPLIANCE AUDITING AND MONITORING

- An ongoing auditing and monitoring system has been being developed consistent with the operations of the Major Healthcare.
- The ongoing auditing and monitoring system shall include, at a minimum, Quarterly review of the following:
  1. Candidate online distance training expiry date.
  2. Candidate annual Mappa training expiry date.
  3. Candidate Patient handling training expiry date.
  4. Candidate right to work expiry date.

#### Compliance Monitoring through Profile CRM

Major Recruitment operates a market leading CRM system, Microdec Profile who is currently positioned as Number 1 software within the recruitment sector. There a shift and time sheet control system called SAP. SAP has the ability to control candidate availability and shift fulfilment and processing of annual leave and monitor candidate compliance for the entire Major Healthcare workforce. The SAP system has been specifically designed to plan, control and pay large workforces on multiple rotas and multiple locations.

SAP gives Major Healthcare the capability to monitor all staff compliance and upcoming end dates on any essential pieces of compliance. Profile CRM gives us the ability to make staff non complaint this will make staff unavailable to work till the candidate's compliance is updated.

Compliance Category Health & Social C Last updated by Daniel Sawyer on 04-Jul-2018 at 12:23 pm

Debi Gibson is compliant						
Section	Compliance Item	Yes	Expiry Date	Iss./Sign off	Notes	
Right To Work	UK Passport	<input checked="" type="checkbox"/>	16-Jul-2024		520827482	
	EEA Passport or ID Card	<input type="checkbox"/>				
	Student Visa	<input type="checkbox"/>				
	Pin Number	<input type="checkbox"/>				
	Proof of Course (For Visa)	<input type="checkbox"/>				
	Opt Out	<input type="checkbox"/>				
	Other Visa	<input type="checkbox"/>				
	Proof of NI Number	<input checked="" type="checkbox"/>				
	Full UK Birth Certificate	<input type="checkbox"/>				
	Proof of address	<input checked="" type="checkbox"/>				
Application Form	Terms of Engagement Signed	<input checked="" type="checkbox"/>				
Additional Paperw	2 Years References received	<input checked="" type="checkbox"/>			Interserve Healthcare	
	48 Hour Opt Out Form Completed	<input checked="" type="checkbox"/>				
	Health Questionnaire Completed	<input checked="" type="checkbox"/>				
	Confidentiality Form Completed	<input checked="" type="checkbox"/>				
	Equal Opportunities Form Completed	<input checked="" type="checkbox"/>				
	Temporary Worker Disclaimer Signed	<input checked="" type="checkbox"/>				
Moving & Handling	Restraint Training	<input checked="" type="checkbox"/>	21-Feb-2018		Interserve Healthcare major	
	Driving Licence Check	<input type="checkbox"/>				
Drivers	DBS up to date Service	<input checked="" type="checkbox"/>	12-Apr-2019		001570017657	
	Health Assessment (Nights) Completed	<input type="checkbox"/>				

## Monthly compliance Reports

All staff files will be subject to quarterly internal audits. Advanced downloaded compliance reports from profile CRM forms our training and compliance activities for the following quarter as all reports are downloaded a quarter in advance.

## Candidate Compliance and recruitment Processes

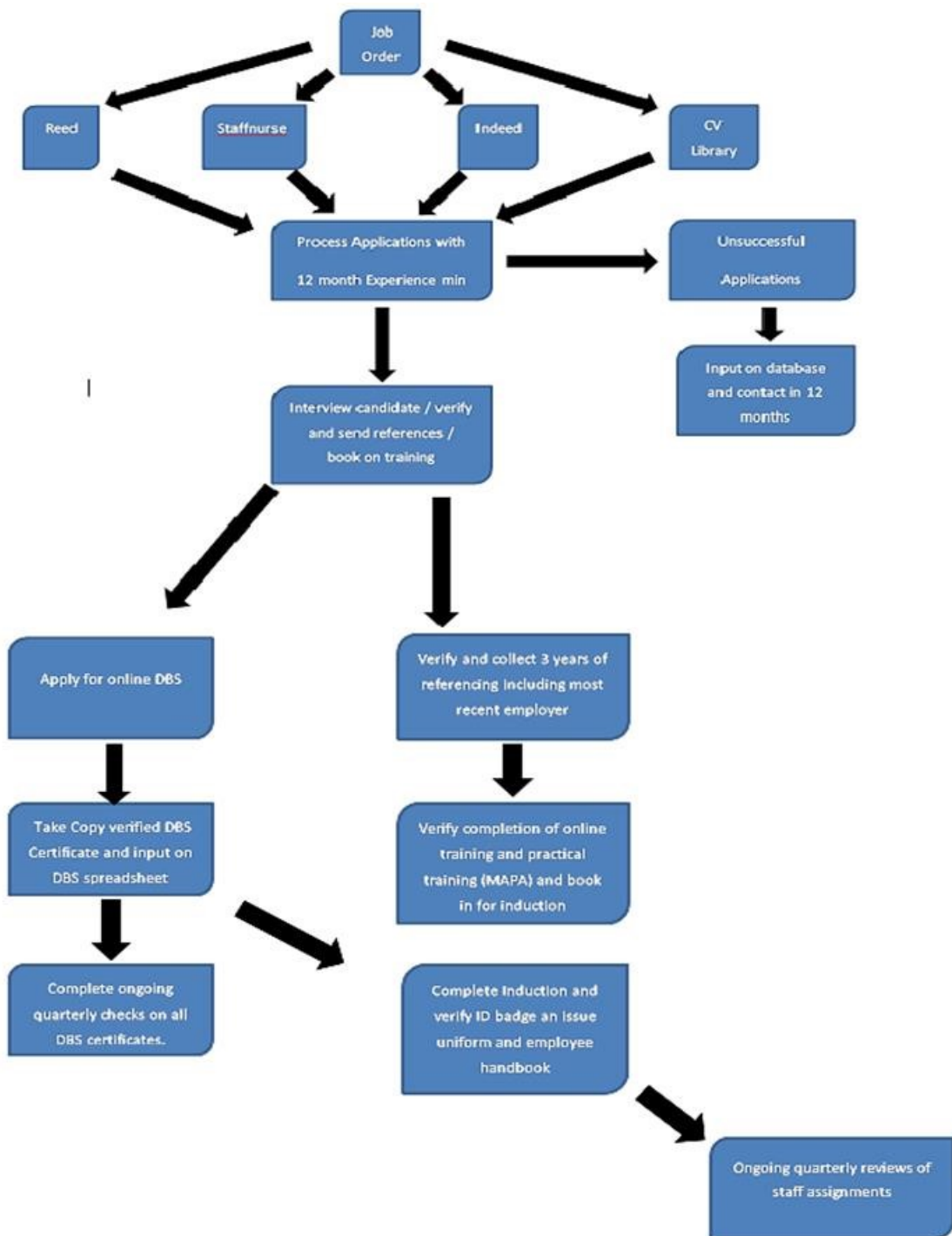
### SELECTION CRITERIA

As an Employment Business we commit to best practice interview and selection procedures and will ensure that any candidate information provided to the MHC is validated, accurate and reliable. Major Healthcare accepts responsibility for ensuring we copy original documents, sign date and stored in a secure location.

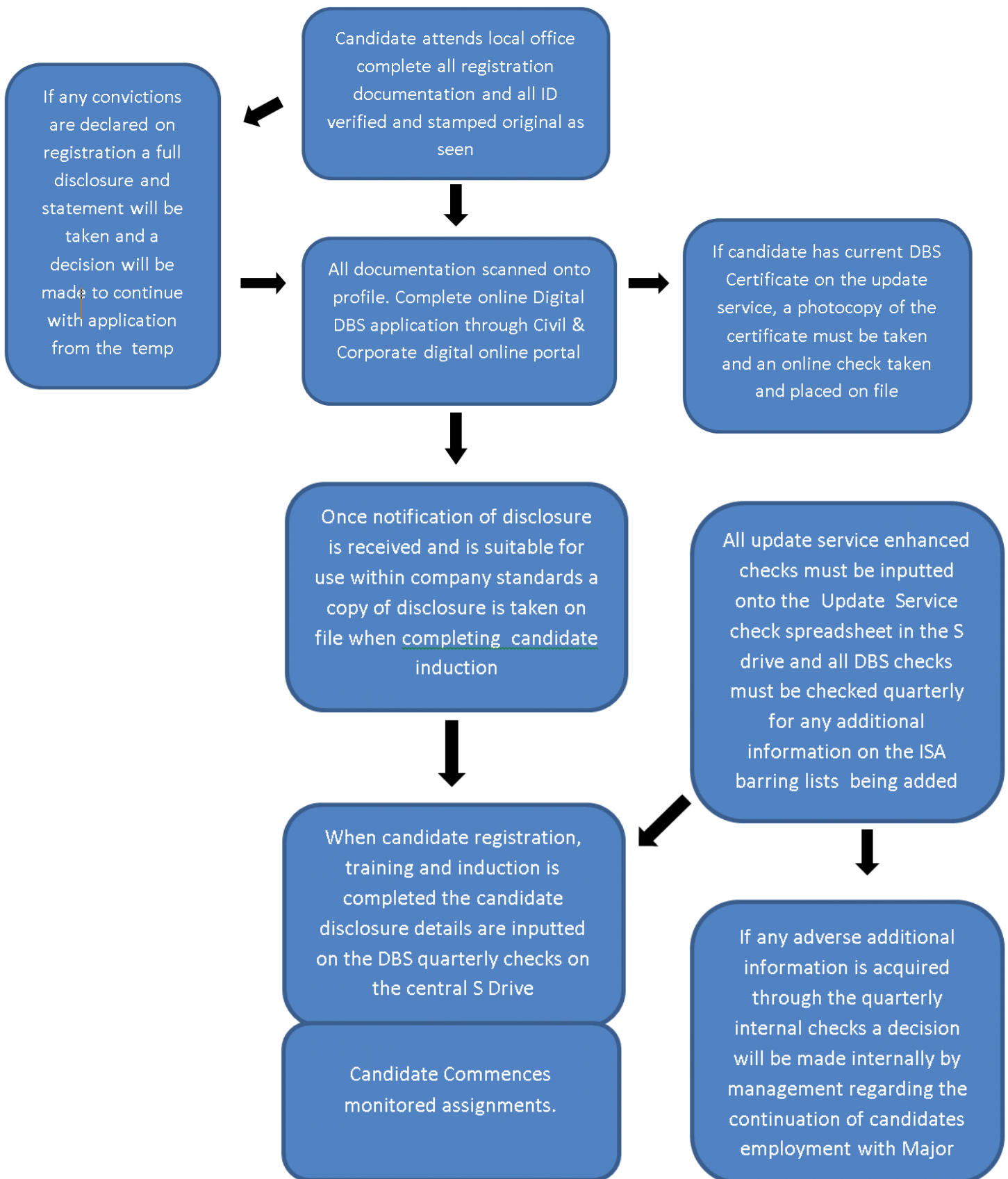
#### **All candidates go through robust recruitment and selection criteria flow chart provided**

- Interview all candidates face to face
- A full application form is completed with full work history since secondary education.
- Annual health declaration is completed and annual health screening is monitored and updated every 12 months
- Take work references that cover 3 years with no gaps in employment and all reasons for leaving employment explained.
- Reference taken from most recent employer.
- Check individual's right to work in the UK in line with sections 15 to 25 of the Immigration, Asylum and Nationality Act 2006 (the 2006 Act) and sections 24 and 24B of the Immigration Act 1971.
- All candidates are interview scored based on generic interview questionnaires and nurse clinical interviews completed by in house nurse.
- Apply for candidate DBS once all right to work documents are verified.
- Check DBS on update service of the candidate DBS is portable and quarterly checks completed and logged on compliance tracker.
- All staff complete MAPPA training within all mental health environments
- All staff complete 23 module online training and 1 half day practical patient moving and handling training
- A full half day induction is completed with all staff outlining their roles and responsibilities and the candidates duty of care
- ID badge is issued on completion of induction and is renewed every 12 months.
- All candidates are issued an employee handbook and are made to read it and the candidates must acknowledge their understanding of its contents whilst in the company induction.
- Once all training compliance items are completed a full profile is sent over to clients outlining full work history and training and DBS details example profile provided

## Recruitment Process Flow Chart



## Major Healthcare DBS Process 2017



### 1. General principles

As an organisation using the Disclosure and Barring Service (DBS) checking service to help assess the suitability of applicants for positions of trust, Major recruitment complies fully with the code of practice regarding the correct handling, use, storage, retention and disposal of certificates and certificate information.

It also complies fully with its obligations under the Data Protection Act 1998 and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of certificate information and has a written policy on these matters, which is available to those who wish to see it on request.

#### 1.1 Storage and access

Certificate information should be kept securely, in lockable, non-portable, storage containers with access strictly controlled and limited to those who are entitled to see it as part of their duties.

#### 1.2 Handling

In accordance with section 124 of the Police Act 1997, certificate information is only passed to those who are authorised to receive it in the course of their duties. We maintain a record of all those to whom certificates or certificate information has been revealed and it is a criminal offence to pass this information to anyone who is not entitled to receive it.

To note: those registered care homes which are inspected by the Care Quality Commission (CQC), those organisations which are inspected by Ofsted and those establishments which are inspected by the Care and Social Services Inspectorate for Wales (CSSIW ) may retain the certificate until the next inspection.

Once the inspection has taken place the certificate should be destroyed in accordance with the code of practice.

#### 1.3 Usage

Certificate information is only used for the specific purpose for which it was requested and for which the applicant's full consent has been given.

#### 1.4 Retention


Once a recruitment (or other relevant) decision has been made, we do not keep certificate information for any longer than is necessary. This is generally for a period of up to six months, to allow for the consideration and resolution of any disputes or complaints.

If, in very exceptional circumstances, it is considered necessary to keep certificate information for longer than six months, we will consult the DBS about this and will give full consideration to the Data Protection and Human Rights of the individual before doing so.

Throughout this time, the usual conditions regarding the safe storage and strictly controlled access will prevail.

#### 1.5 Disposal

Once the retention period has elapsed, we will ensure that any DBS certificate information is immediately destroyed by secure means, for example by shredding, pulping or burning. While awaiting destruction, certificate information will not be kept in any insecure receptacle (e.g. waste bin or confidential waste sack).



We will not keep any photocopy or other image of the certificate or any copy or representation of the contents of a certificate. However, notwithstanding the above, we may keep a record of the date of issue of a certificate, the name of the subject, the type of certificate requested, and the position for which the certificate was requested, the unique reference number of the certificates and the details of the recruitment decision taken.

### 2.7 Acting as an umbrella body

Before acting as an umbrella body (an umbrella body being a registered body which countersigns applications and receives certificate information on behalf of other employers or recruiting organisations), we will take all reasonable steps to satisfy ourselves that they will handle, use, store, retain and dispose of certificate information in full compliance with the code of practice and in full accordance with this policy.

We will also ensure that any body or individual, at whose request applications for DBS certificates are countersigned, has such a written policy and, if necessary, will provide a model policy for that body or individual to use or adapt for this purpose.