



## Safer Employment Policy

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Version:	Six
Status:	Final
Review Period	3 Years
Author:	Human Resources
Applies to:	Staff / Volunteers / External Candidates

Pentreath Ltd is committed to achieving a working environment which provides equality of opportunity and freedom from unlawful discrimination on the grounds of race, sex, pregnancy and maternity, marital or civil partnership status, gender reassignment, disability, religion or beliefs, age or sexual orientation.

If you require this document in other formats or languages, please contact the author.

EQUALITY IMPACT ASSESSMENT			
Who does the policy affect?	Staff / Clients / Referrers / Public		
		Yes	No
1. Will the proposal have any impact on discrimination, equality of opportunity or relations between groups?	X		
2. Is the proposal controversial in any way (including media, academic, voluntary or sector specific interest) about the proposed work?			X
3. Will there be a positive benefit to the users or workforce as a result of the proposed work?	X		
4. Will the users or workforce be disadvantaged as a result of the proposed work?			X
5. Is there doubt about answers to any of the above questions (e.g. there is not enough information to draw a conclusion)?			X

If the answer to any of the above questions is Yes (other than question 3) or you are unsure of your answers to any of the above you should provide further information using the Equality Impact Assessment form

<p>If an equality assessment is not required briefly explain why:</p> <p>There are a limited set of circumstances when Pentreath can target specific groups with advertising: for instance, if the job has a genuine occupational requirement for someone from a particular community, or if a specific community can be shown to have been under-represented in an area of work.</p>
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DOCUMENT CHANGE HISTORY		
Version	Date	Comments (viewed / reviewed / amended etc)
Five	15/07/2025	Renamed from Safer Recruitment Policy to Safer Employment Policy and updated to reflect Safer Employment best practice
Six	03/09/2025	Clarification of wording in relation to volunteers. No fundamental changes.

Ratification Body	SMT
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## 1. INTRODUCTION

Effective and consistent recruitment practices are essential to ensure that all applicants are treated fairly and equitably.

The recruitment process must result in the selection of the most suitable person for the job in respect of skills, experience and qualifications.

## 2. PURPOSE AND RATIONALE

Safer recruitment and robust vetting provide organisations with the first opportunity to deter and prevent those who may be unsuitable for work with vulnerable people from securing a role with them.

The PRISIM model of safer employment is a framework that encompasses this 360° approach to safeguarding in employment. It supports employers to embed a safeguarding mindset at every stage of the employment journey – from planning recruitment through to managing leavers.

A safeguarding mindset is the difference between compliance and curiosity; compliance means meeting minimum standards and ticking the right boxes, but not exploring or considering anything sitting outside of that process, and curiosity means going beyond minimum standards and being actively curious about information we do and don't have.

For curious recruiters, when something does not seem right they seek additional information to validate or challenge that mindset. This means they will have the evidence they need to make the right decision.

Through safer employment, Pentreath is committed to safeguarding and promoting the welfare of adults at risk and/or children and expects all our staff to share these values.

Pentreath are committed to treating all applicants equally and fairly based on their skills, experience, and ability to fulfil the duties required of the role applied for; this is regardless of any protected characteristics (ethnicity, gender or gender reassignment, religion or belief, sexual orientation, physical/mental disability, age, pregnancy or maternity, marriage, or civil partnership).



### 3. POLICY STATEMENT

#### Induction and probation

Pentreath do not actively recruit volunteers. However, any volunteer recruitment will follow the same process as paid employment recruitment, in line with this policy, to promote ethical and equitable decision making.

This Policy defines the principles that Pentreath considers important in the recruitment process and aims to ensure that consistency and good practice is applied across the Company and should be read in conjunction with the Disclosure and Barring Service (DBS), Equality & Diversity, Induction, Probation and Recruitment of Ex-Offenders policies.

Pentreath ensure that staff who are involved in the recruitment process have received appropriate guidance and training in safe and fair recruitment, including the relevant legislation that governs criminal record disclosure.

Pentreath comply fully with the Disclosure and Barring Service (DBS) [code of practice](#) and undertake to treat all applicants fairly. All information disclosed will be treated in the strictest confidence.

#### **Equality, Diversity and Inclusion**

It is against the Company's Equality & Diversity Policy and against the law in many cases to discriminate either directly or indirectly on the grounds of race, gender, marital status, pregnancy, age, disability, sexual orientation, gender reassignment, cultural or religious beliefs. Reasonable adjustments to the recruitment process will be made to ensure that no applicant is disadvantaged because of a disability.

All Pentreath's policies and procedures reflect our commitment to achieving and maintaining equal opportunities within the workplace. Any staff member who is found to be discriminating in any way during the recruitment process will be subject to disciplinary action.

Job advertisements must not discriminate based on any of the protected grounds, unless there is objective evidence that the discrimination is lawful. Here are a few examples:

Stating a preference for a man or woman in a job advertisement is unlawful sex discrimination unless the requirements of the particular job mean that it is lawful to employ only a man or a woman. Gender-specific job titles, such as 'handyman' or 'salesgirl', should therefore be avoided. It is also likely to be unlawful to use language that indirectly implies the job is suited to one sex or other.

Advertisements should not include age limits, unless these can be objectively justified. Avoid using words and phrases such as 'young and dynamic' or 'mature person'. These could result in a complaint of age discrimination since they suggest an employer is looking for applicants from a particular age group.

It could be discriminatory to restrict the advertisement of a job to a particular religious publication, since potential candidates who belong to other religious or belief groups would be much less likely to have the opportunity to see it.

There are a limited set of circumstances when Pentreath can target specific groups with advertising; for instance, if the job has a genuine occupational requirement for someone from a particular community, or if

a specific community can be shown to have been under-represented in an area of work.

## 4. DEFINITIONS

**4.1** An **employee** is a member of staff who is in paid employment at Pentreath

**4.2** A **volunteer** is a member of staff who is not employed by Pentreath

**4.3** An **external candidate** is someone not employed by, or is volunteering at, Pentreath

**4.4** The term **safer employment**, for this policy, refer to Pentreath's practice for ALL forms of recruitment

## 5. DUTIES AND RESPONSIBILITIES

**5.1** Senior Leadership Team and Line Managers authorise vacancies and liaise with HR throughout the recruitment process

**5.2** Finance are responsible for providing accurate project budgets

**5.3** HR Manager to keep up to date with Employment Law

**5.4** HR team is responsible for overseeing the recruitment process

**5.5** Line Managers responsible for ensuring continuous safer employment practices as detailed in this policy

## 6. POLICY DETAILS

### 6.1 PLANNING TO RECRUIT for Safer Employment

#### 6.1.1 Vacancies:

- Must be authorised by the Senior Leadership Team or Line Manager
- On occasion a business decision is made and documented to restrict recruitment, for example, to employees within a specific project or department, or a specific salary band, for reasons including budget limitations, or a vacancy which requires employees to hold an existing equivalent level of responsibility within the company; where this happens, Pentreath will be transparent with all staff
- The Project Manager must complete a Vacancy Proforma which considers project / business requirements such as part time / full time hours, base and contract length.

#### 6.1.2 Job Descriptions:

- Job Descriptions describe the objectives, responsibilities and seniority of the post, and the job-related person specification criterion describes the essential and desirable qualifications, knowledge, experience, skills and competencies needed for the role to be carried out effectively
- Project Manager and HR work together to produce a Job Description for the vacancy which provides a fair and accurate representation of the role and follows the format which is laid out in the Job Description
- The Job Description will be supplied to all candidates with the job application form, to enable them

to complete the application form adequately

- Care must be taken when producing Job Descriptions to ensure that unreasonable requirements are not placed on the job holder which cannot be objectively justified and may unfairly disadvantage certain groups, in line with Pentreath's Equality and Diversity Policy
- Job Descriptions are subject to annual review.

## 6.2 RECRUITING AND VETTING for Safer Employment

### 6.2.1 Vacancies when employees are at risk of redundancy

- In line with the Redundancy Policy, vacancies will be advertised to employees at risk of redundancy to apply for first
- See Redundancy Policy

### 6.2.2 Applying for vacancies as a current employee (internal recruitment, internal application process)

- Current employees can apply for advertised vacancies
- Upon request, employees will be provided with the Job Description which includes job related criteria in the person specification, and an internal application form
- An Expression of Interest may be accepted, in place of an application form, for restricted recruitment and at the discretion of HR; this will be made clear when advertised, if applicable

### 6.2.3 Applying for vacancies as a current volunteer (internal recruitment, external application process)

- Current volunteers can apply for advertised vacancies
- Volunteers who do not have a Pentreath email address will have internal vacancy adverts sent to their personal email addresses by their supervisor
- Upon request, volunteers will be provided with the vacancy job description which includes job related criteria in the person specification, and an external recruitment application pack

Whilst able to apply for internally advertised employment, current volunteers are required to complete the external application process (see 6.2.5).

### 6.2.4 Applying for vacancies as an external candidate (external recruitment, external application process)

- To allow the most efficient recruitment process, when required, and to meet the business need, vacancies will be advertised internally and through external advertising methods concurrently
- External vacancies will be advertised through Pentreath's website and other platforms
- Upon request, external candidates will be provided with the vacancy job description which includes job related criteria in the person specification, and an external recruitment application pack for either employment or volunteering.

### 6.2.5 External application process

Pentreath does not accept applications by way of Curriculum Vitae (CV); this is to enforce safe and fair recruitment and safer employment practices. Any applications made in this way will be rejected and the applicant will be provided with an external recruitment application pack. Within the recruitment application pack will be an application form for candidates to complete and return.

The application form provides clear instruction for completion.

The Supporting Statement on the application form is crucial; the candidate must demonstrate they have the necessary knowledge, skills and experience required by addressing each of the role-specific criteria on the job description person specification using the identifying letter (A, B, C and so forth). The candidate must describe how they meet each individual criteria letter along with specific examples using the STAR approach (situation, task, action, result) for each criterion. If a high number of applications are received for a vacancy, only those who have used this method will proceed to shortlisting.

If a candidate wishes to apply for multiple vacancies, they will be advised by HR if they are required to complete a separate application form for each vacancy; reason being that some roles have different job-related criteria in the person specification.

Candidates must share with Pentreath, all the relevant information that Pentreath request in the application form, but Pentreath would like to reassure candidates that any information provided will be treated in the strictest confidence. All sections must be completed.

Due to unforeseen circumstances vacancies can be withdrawn, at the discretion of HR, at any time.

### 6.2.6 Submitting applications

Candidates must return their completed application form by the closing date as advertised. In unforeseen circumstances this date may be changed or extended at the discretion of HR.

Electronic application forms must be emailed to [jobs@pentreath.co.uk](mailto:jobs@pentreath.co.uk) preferably as a word document. Pentreath do not accept application forms by way of sharepoint or google docs. Additional documents such as CVs and covering letters need not be submitted as they are not considered part of the recruitment process.

Paper application forms must be in a sealed envelope marked Private & Confidential, and sent to:

Human Resources Team

Pentreath Ltd

St.Enoder Barns

Glebe Farm,

Narrow Lane

Summercourt

Newquay

TR8 5EE

### 6.2.7 Shortlisting

To shortlist candidates for interviews, Pentreath will:

- Separate the candidate's personal details, referees, reasonable adjustment requests and declaration sections of the application form, so that decisions can be made without access to personal information and remove the potential for unconscious bias.
- Select two members of staff to shortlist independently
- Scrutinise application forms to ensure that they are fully and properly completed, the information provided is consistent and does not contain any discrepancies and identify any gaps in employment
- Use the Supporting Statement to match specific job-related criteria from the person specification to select which candidates will be invited for interview

Candidates who apply for positions with Pentreath will always be informed of the outcome of their application as quickly as possible in writing. Candidates have the right to be informed as to why they were not shortlisted for interview.

#### Candidates successful at shortlisting

Candidates will receive a letter inviting them to interview, along with directions to the Pentreath site, the DBS Policy and a criminal record self-declaration form.

The application form provides a space for the candidate to state dates they are not available for interview, which will be considered at this stage. Pentreath cannot always accommodate requests for alternative interview dates.

Reasonable adjustment requests will be fully considered; a member of Pentreath's HR Team will contact a candidate to discuss any requests before they attend interview.

#### Candidates unsuccessful at shortlisting

Writing to unsuccessful candidates will be prompt and polite. If an unsuccessful candidate requests information for the reasons why they were not successful, Pentreath are happy to provide further feedback.

### 6.2.8 Interviews

External candidates invited to interview are required to complete a criminal record self-declaration form, relevant to the level of role applied for, prior to attending interview, giving them the opportunity to provide enough information. At interview, or in a separate confidential discussion, Pentreath will ensure that an open and measured discussion takes place about any offences that might be relevant to the position.

Interviews are usually held at one of Pentreath office's (Summercourt and Threemilestone, Truro), however, other locations are sometimes used when interviewing for co-located roles.



Company dress code is smart casual.

Pentreath appreciates that interviews can be daunting. Pentreath gives the opportunity to view interview questions 30 minutes in advance of interview. The invite to interview letter will state the timings.

Candidates are welcome to bring any notes or flashcards they may have, along with a notepad and pen to make notes during the interview.

Interviews are conducted by a panel of at least two people, and, at a minimum, one of whom will be trained in Safer Recruitment. Volunteer Client Representatives might also be invited to form part of the interview panel. Representatives from external partner organisations may also sit on the interview panel.

The panel will have a copy of the applicant's application form to ask about any gaps or inconsistencies on their application form.

In line with Safer Employment best practice, questions posed to candidates will follow Warner Style questioning which considers attitudes and motivations to establish a fuller picture of the applicant and their suitability to work with children and adults.

The interview panel will take notes, so they can remember what a candidate says in response to a question. These notes will be relevant to the person specification and post concerned, and will not refer to racial or ethnic origin, political opinions, religious beliefs, trade union membership, medical history, appearance or private life, other than for employment law or specified purposes; HR will ensure the questions that candidates are asked are not in any way discriminatory or unnecessarily intrusive.

Interviews will be scored using Pentreath's internal scoring system in a fair and consistent manner with all candidates being asked the same questions.

In the event of an unsuccessful interview, interview notes will be stored electronically for a period of three months and then confidentially disposed of. Candidates have the right to be informed as to why they were unsuccessful at interview, can request feedback and have the right to see their interview notes; these can be obtained via Human Resources.

#### **6.2.9 Offer of Employment or Volunteering**

Once the most appropriate candidate has been selected, the candidate will be contacted in the first instance and offered the post. Once the candidate has accepted the post the unsuccessful candidates will be contacted.

Offer letters of appointment to successful candidates will be sent out promptly and will indicate clearly the terms on which the post is being offered, subject to satisfactory references being obtained, completion of a Disclosure and Barring Service check, and detailing the probationary period (please see Probation Policy, only applicable to employees).

No appointment will be confirmed without receipt of satisfactory, written references.

For employees, starting salary will be dictated by Pentreath pay scales in line with existing employees in a similar role, ensuring consistency across the organisation.

#### 6.2.10 References

All offers of employment or volunteering are conditional upon receipt of two references which are satisfactory to Pentreath. Candidates will be unable to start in post without these checks complete.

Referees will be contacted once an offer of employment or volunteering is made and accepted. Pentreath will not do this without first asking the successful candidate for permission.

Pentreath will approach previous employers for information to verify experience or qualifications. If a candidate is currently working with adults at risk and/or children, the referees will be asked if the candidate has been the subject of any safeguarding related investigations or concerns, and if so, the outcome of any enquiry or disciplinary procedure including any referrals to Disclosure and Barring Service (DBS), other professional bodies or the police.

Pentreath need to verify the successful candidate's identity in line with Department of Work and Pensions HMG Baseline Personnel Security Standard and will therefore need to contact recent employers (minimum 3 years)

- **Referee 1 MUST be the candidates current or most recent employer**

If they have no current or previous employment, they must provide details of someone who can provide a character reference. If the candidate is a school leaver or graduate entrant with no experience, they should provide details of someone who can provide a character reference

- **Referee 2 MUST be the candidates second most recent employer**

Again, if they have no previous employment, they must provide details of someone who can provide a character reference. please give details of someone who can provide a character reference. If the candidate is a school leaver or graduate entrant with no experience, they should provide details of someone who can provide a character reference

Professional references will not be accepted from work colleagues who are not authorised to provide professional references in an official capacity on behalf of the organisation, or from people writing solely in the capacity of friends, or from relatives.

Pentreath will telephone referees in the first instance to confirm their identity, then request a standard reference form in writing to be completed. Additional details may be checked or clarified by telephone, where necessary, on receipt of the written reference. Where a written request for a reference has not been received, Pentreath will telephone the referee again to seek an oral reference instead. Where references are provided over the phone, Pentreath will keep a written account and ask the referee to confirm that it is an accurate reflection of information they have provided. This information will be retained and stored in the

candidate's personnel file. Reference Forms are open documents and can be requested to be viewed by the candidate.

Pentreath will scrutinise references to check for gaps and any inconsistencies between information provided on the reference and the application form. If satisfactory references are not received, employment or volunteering will not commence.

#### **6.2.11 Disclosures through the Disclosure and Barring Service (DBS)**

A criminal record self-declaration form is part of the recruitment process at the interview stage, and Pentreath encourage all applicants to declare any unspent criminal convictions at an early stage in the application process. Any discussion with HR will be strictly confidential.

Pentreath only carry out criminal record checks with DBS on successful candidates at the appropriate level for the role applied for.

Prior to commencing employment or volunteering, once a job or placement offer has been accepted, the candidate will be required to apply for a DBS check via the online disclosure system, or candidates can advise HR if they are on the DBS update system.

Please refer to the Disclosure and Barring Service (DBS) Policy for further information.

#### **6.2.12 Student work placements**

Students on placement who are required to work with clients have been subject to checks at the required level for Regulated Activity, through obtaining a letter of assurance and a copy of their DBS certificate from their employer.

### **6.3 INDUCTION AND PROBATION for Safer Employment**

Pentreath use staff induction and probationary periods to enforce safer employment practices in the following ways:

#### **6.3.1 Human Resources**

- ✓ Ensure appropriate communication before commencement and during induction
- ✓ Provide information about the organisation's policies and procedures
- ✓ Support individuals in a way that is appropriate for the role for which they have been engaged
- ✓ Provide opportunities for a new member of staff to discuss any issues or concerns about their role or responsibilities

#### **6.3.2 Line Managers**

- ✓ Follow a clear set of induction and probationary processes which they are responsible for following with new recruits. These include regular one to ones where conduct, performance and development needs are discussed and allowing opportunities for a new member of staff or volunteer to discuss any issues or concerns about their role or responsibilities

- ✓ Establish any concerns or issues about the person's ability or suitability for work with the client group at the outset and address them immediately
- ✓ Identify and share any concerns about the conduct of the individual during their induction and probationary period with them in a timely manner, giving them an opportunity to address concerns and improve their performance
- ✓ Ensure that both the new staff member and Line Manager sign documents to confirm the induction process has been completed satisfactorily. With a record kept on file.

### **6.3.3 Training**

- ✓ Staff complete mandatory training to include professional boundaries, safeguarding and safer working practices, appropriate conduct and workplace culture
- ✓ Face to face safeguarding training reinforces the conduct expected of staff in relation to safe working practices with children and young people or vulnerable adults

## **6.4 SUPERVISION AND MANAGEMENT for Safer Employment**

Pentreath use supervision and management to enforce safer employment in the following ways:

### **6.4.1 All staff**

- ✓ Are encouraged to openly reflect on their performance and conduct in supervision and performance management conversations, and to ask for support and guidance where needed
- ✓ Identify and discuss concerns at any time and need not wait for supervision
- ✓ Know how to access the Safeguarding Adults Policy and Child Protection Policy, understand the content and can follow appropriate processes for reporting concerns
- ✓ All policies, including Whistleblowing, are accessible to all staff during work hours

### **6.4.2 Line Managers**

- ✓ Ensure staff compliance with expected behaviours and attitudes that constitute best practice in relation to safeguarding
- ✓ Discuss performance, objectives, values and behaviours, wellbeing, safeguarding and conduct with staff during regular supervisions
- ✓ Identify and discuss safeguarding and conduct concerns at any time and need not wait for supervision.

- ✓ Know how to have difficult conversations
- ✓ Complete observations (in person or virtually) of their staff undertaking work, gathering evidence of their performance and conduct in post throughout the year, celebrating and recognising good performance and conduct and addressing poor performance and conduct
- ✓ Ensure supervision documents, notes from meetings and one to ones, including any concerns discussed and formal management conversations, are recorded and shared with the staff member, sent to HR and stored in a confidential electronic file.

## **6.5 IDENTIFY AND MANAGE CONCERNS for Safer Employment**

Pentreath identify and manage concerns through the following ways:

### **6.5.1 Workplace Culture**

- ✓ An open and trusting workplace where the reporting of concerns is encouraged and supported by the Trustees and Chief Executive
- ✓ Display of courageous leadership in tackling and managing concerns and making employment decisions with a safeguarding mindset
- ✓ Human Resources can be approached in confidence for staff to share concerns and will act on the information appropriately

### **6.5.2 Policy and Procedure**

- ✓ Clear policies and procedures are in place and accessible to all staff
- ✓ Complaints Policy allows service users to raise concerns. All concerns and complaints are fully investigated, accurately recorded and retained securely
- ✓ Allegations or concerns raised regarding an employee's behaviour towards children, young people and adults at risk will be discussed with appropriate Adult Social Care Safeguarding team at the earliest opportunity. Refer to Person in Position of Trust (PiPoT) guidance which is set out in the Safeguarding Adults Policy
- ✓ Whistle Blowing policy that has been publicised and is available to all, with all concerns acted upon in a fair and timely manner
- ✓ Disciplinary Policy and Grievance Policy, which comply with the ACAS code of practice and which are followed in all formal disciplinaries, grievances and investigations

- ✓ Appropriate disciplinary procedures are applied when safeguarding measures are not strictly adhered to
- ✓ Managers and Coordinators are trained in how to carry out effective investigations into allegations and concerns around the conduct of employees
- ✓ Trained and experienced Adult Safeguarding Leads and Child Safeguarding Leads support investigations and the management of any safeguarding concerns
- ✓ Policies and procedures are reviewed regularly.

## **6.6 MANAGING EXITS AND REFERRING INFORMATION for Safer Employment**

Pentreath manage exits and refer information through the following ways:

### **6.6.1 Human Resources**

- ✓ All leavers are invited to complete an exit interview, prior to leaving, to provide valuable feedback about their time at Pentreath
- ✓ Staff records are kept for a minimum of eight years (subject to additional retention requirements) on leaving employment, which will include any disciplinary concerns and reasons for leaving
- ✓ Investigations and disciplinaries relevant to conduct and safeguarding are carried out and concluded even where individuals resign before the end of the process
- ✓ It is not Company Policy for line managers or other staff to provide references for employees (current or past). Employee references are produced by Human Resources. This ensures that references are fair, protected from personal bias, and legal. There may be circumstances where a Line Manager may wish to provide a reference, however this would not represent the Company, it could only be used as a personal reference and must clearly state that it is a personal reference.
- ✓ Human Resources will share relevant conduct information and safeguarding concerns with other employers when providing references as a commitment to safeguarding.

### **6.6.2 Referring information**

- ✓ Senior Leadership understand the importance of, and are committed to, sharing and referring relevant conduct information to safeguard and protect children and adults. Conduct or safeguarding concerns where staff are found to have harmed adults at risk/children, are referred to the DBS, the police, the Local Authority Safeguarding Adults Team or Local Authority Designated Officer and Local Safeguarding Children Board – refer to the Safeguarding Adults Policy and Child Protection Policy for guidance and procedures

- ✓ Pentreath has effective, UKGDPR/DPA 2018 compliant procedure in place for recording decisions and the rationale for sharing information with other organisations or individuals

## 6.7 RETENTION OF RECORDS

- Internal and successful external candidate recruitment records will be retained in personnel files and access will be limited to HR
- In line with GDPR, unsuccessful external candidate application forms will not be retained for future vacancies
- Unsuccessful external candidate interview notes will be retained for three months and then destroyed

Employee records will only be kept for as long as they are necessary and relevant to the business, a minimum of 8 years (subject to additional retention requirements).

## 6.8 PERSONNEL RECORDS & STARTER PROCEDURES

Personnel records are held by HR. A file containing records is held for each member of staff and will include:

- Offer Letter / Statement of Terms
- Contract of Employment or Voluntary
- Personal information including home address and next of kin
- Bank details
- References
- Right to work in the UK evidence (verification of ID)
- Changes to terms and conditions
- Absence records
- Current Disciplinary details
- Records of any training undertaken
- Copy of driving licence, vehicle insurance and current MOT documents

These records are held securely only accessible to HR, Deputy Chief Executives and the Chief Executive. Staff will be asked annually to confirm the personal information we hold on record is correct.

## 6.9 THE BRIBERY ACT

When recruiting for posts that may be vulnerable to bribery risks (such as roles in Purchasing, Marketing or Distribution), and subject to the requirements of the Rehabilitation of Offenders Act 1974, Pentreath Ltd may need to carry out additional checks during the recruitment process.

## **6.10 WORK PERMITS AND ILLEGAL WORKING**

It is against the law to employ a person who does not have permission to live and work in the UK. Pentreath Ltd could be prosecuted and fined under the Immigration and Asylum Act 1999 for employing somebody who does not have permission to work in the UK, therefore, all successful applicants will be required to provide evidence of right to work in the UK.

In order to avoid discrimination, it is essential that the same criteria are applied to every person who is offered employment with Pentreath Ltd. It will be the responsibility of the Human Resources Manager to ensure that relevant documents have been supplied. If an applicant is not able to produce the required documents their employment will be put on hold until evidence can be produced and the offer may be withdrawn.

In compliance with the Department of Work and Pensions HMG Baseline Personnel Security Standard we are required to verify the identity of all Pentreath Ltd employees.

## **6.11 COMPLAINTS PROCEDURE**

Any applicants who consider that they have been unfairly treated or discriminated against during the recruitment process should write to the Chief Executive stating the grounds of the complaint. Any employee who wishes to complain about their experience of the recruitment process should do so by means of the Grievance Procedure.

## **7. MONITORING COMPLIANCE AND EFFECTIVENESS**

- Compliance and effectiveness will be monitored via:
  - exit interviews
  - staff surveys
  - feedback through staff representatives and staff members
- HR to keep a log of any complaints, oversee any actions required and monitor any changes implemented
- Policy to reviewed as required

## **8. TRAINING AND COMPETENCY REQUIREMENTS**

- HR Manager to have up to date training on Employment Law and Safer Employment
- HR and Managers to undertake safer recruitment training, and understand and implement the Safer Employment Policy
- HR to give guidance to Management and Coordinators about Safer Employment
- Equality, Diversity and Inclusivity; meetings and training to feed in to the recruitment process

## **9. ASSOCIATED DOCUMENTS**

Redundancy Policy

Probation Policy

DBS Policy



## 10. APPENDICES

Appendix A - Further reading and reference

### **NACRO support services**

[www.nacro.org.uk/criminal-record-support-service](http://www.nacro.org.uk/criminal-record-support-service)

[Criminal Record Support Service | Help and Advice | Nacro](#)

### **Online toolkit relating to conviction disclosures**

[www.gov.uk/tell-employer-or-college-about-criminal-record/check-your-conviction-caution](http://www.gov.uk/tell-employer-or-college-about-criminal-record/check-your-conviction-caution)

### **Find out why we check you have the right to work in the UK**

[www.gov.uk/government/publications/right-to-work-checklist](http://www.gov.uk/government/publications/right-to-work-checklist)