

**Internal Audit Policy**

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<b>Version</b>	5
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<b>Target Audience</b>	Agency Workers
<b>Approved by</b>	OneCall24 Policy Team

**NHS Client Internal Audits**

As part of our commitment to Quality Assurance and Continuous Improvement, OneCall24 tasks our compliance team with conducting internal audits on agency workers deployed within NHS services. To ensure that all agency worker files meet the necessary standards, we utilise a comprehensive checklist that covers all requirements for supplying candidates to the NHS. This checklist is detailed in Appendix A and is used to ensure full compliance with NHS-specific guidelines and standards.

Each section of the checklist must be completed in full for every placement undertaken, and an auditable trail must be maintained throughout the process. Internal audits are carried out every 4 months, with 25% of our supply audited. This audit includes a range of specialisms, bands, and locations across which we have provided staff. The Compliance Manager and Account Manager oversee the internal audit process, setting timescales and parameters for the audit.

Files are randomly selected for audit, and upon completion of the review, an audit report is produced. This report highlights any non-conformities, detailing the areas where the agency worker's file does not meet compliance standards. The report includes specific timescales for rectification and recommendations for preventing similar issues in the future. If a candidate file is found to be non-compliant, the placement is suspended immediately until the file is rectified and made compliant.

Feedback regarding audit findings is provided face-to-face with the relevant personnel involved in the creation and/or placement of the candidate. In cases where patterns or training needs are identified through an internal audit, additional training will be provided, and records will be updated and retained in the relevant personnel's file.

**Private Client Internal Audits**

In addition to audits for NHS clients, OneCall24 also conducts internal audits for our private clients to ensure that the required standards and compliance are met. Although the specific checklists for private clients are not included in this document's appendix, each client has its own tailored checklist that is used during the audit process. These checklists are created in collaboration with the private client to address their unique requirements and ensure full compliance with their standards. Similar to the NHS audits, files for private clients are randomly selected for review. The audit process includes assessing compliance with both internal policies and any specific requirements laid out by the private client. If non-conformities are identified, corrective actions will be taken, and placements will be suspended until the necessary corrections are made. The Compliance Manager and Account

Manager oversee the audit process, ensuring that it aligns with the client's expectations and regulatory requirements.

### **Compliance Process from Submission**

The Registrations Team is responsible for obtaining all required documents from prospective candidates in accordance with the Trust and Audit requirements. These documents are thoroughly verified before being accepted into the system.

The document verification process includes, but is not limited to:

- Validating the candidate's Right to Work
- Verifying that training is CSTF aligned, includes all mandatory modules, and has been completed through practical experience rather than just electronically
- Confirming that the correct documents have been received and properly verified
- Ensuring the candidate has the relevant experience for the prospective assignment through training, qualifications, assessments, interviews, and references

Once the Registrations Officer deems the candidate's file complete, it is submitted to the Compliance team for an audit.

Senior members of the Compliance team then conduct regular quality checks to ensure that the candidates being approved for work meet the required standards in line with current audit and framework guidelines. The responsibility falls on Compliance Officers to uphold these standards and to stay informed about any updates to policies or procedures. Additionally, seniors are required to deliver training sessions to ensure that the verification and sign-off of candidate files are done correctly and meet the necessary audit standards.

### **Maintenance within the Compliance Function**

The Compliance function at OneCall24 is dedicated to ensuring that registered candidates consistently maintain up-to-date compliance levels. All relevant documents are uploaded onto an internal system, which tracks expiry dates. The system automatically notifies the Compliance team when any document is approaching its expiry. In an effort to maintain compliance, the team attempts to contact the candidate through email, phone calls, and text messages. If these attempts are unsuccessful, the candidate will be placed on compliance lock, meaning they cannot continue working until the necessary document is updated.

Regular checks are carried out across the following documents to maintain a compliant database:

- Right to Work
- Identity Checks
- NMC Status
- Fitness to Work
- Mandatory Training
- DBS Online Update Service
- Appraisals
- OneCall24 ID Badge

Before a candidate is assigned to a role, checks are conducted on their DBS status and relevant professional body status (NMC, HCPC). These checks are also repeated on an ongoing basis to ensure that the information provided remains accurate and up to date, particularly before each expiry.

**Review**

This policy statement will be reviewed annually as part of our commitment to upholding professional standards. It may be altered from time to time in the light of legislative changes, operational procedures or other prevailing circumstances.

## Appendix A

Criteria Grouping	Fail Type	Individual Lot 3b Compliance Audit Criteria Elements
<b>Instant Fail</b>	<b>Instant</b>	Identification of suspected fraudulent documentation.
	<b>Instant</b>	Third party Audit Consent provided by the Temporary Worker to the Supplier (file will also be included within the Re-Audit process if not evidenced during the initial Compliance Audit).
<b>NHS Employment Check Standard</b> Identity checks	<b>Core</b>	Identity checks in alignment to the <a href="#">best practice guidance published by NHS Employers</a> and additional requirements outlined within the framework Specification (Identity Checks, Paragraph 2 Additional Mandatory NHS Employment Check Standard Criteria of Section 6 Recruitment Procedures: Standards, Obligations & Assurance): <ul style="list-style-type: none"> <li>Utilisation of electronic scanning equipment (paragraph 2.1).</li> </ul>
<b>NHS Employment Check Standard</b> Criminal record checks	<b>Core</b>	Criminal record checks in alignment to the <a href="#">best practice guidance published by NHS Employers</a> additional requirements outlined within the framework Specification (Criminal Record Checks, Paragraph 2 Additional Mandatory NHS Employment Check Standard Criteria of Section 6 Recruitment Procedures: Standards, Obligations & Assurance). <ul style="list-style-type: none"> <li>Conviction disclosure (paragraph 2.3);</li> <li>Police check for Temporary Workers who have entered the United Kingdom or been resident within the United Kingdom for less than six (6) months (paragraph 2.4.2) where this has not been undertaken as part of the Temporary Worker's visa application; and</li> <li>Disclosure/Rehabilitation of Offenders Act 1974 and Fitness to Practise declaration by the Temporary Worker (paragraph 2.4.4).</li> </ul>
<b>NHS Employment Check Standard</b> Work health assessments	<b>Core</b>	Work health assessments in alignment to the <a href="#">best practice guidance published by NHS Employers</a> and additional requirements outlined within the framework Specification (Work Health Assessments, Paragraph 2 Additional Mandatory NHS Employment Check Standard Criteria of Section 6 Recruitment Procedures: Standards, Obligations & Assurance).

		<ul style="list-style-type: none"> <li>Utilisation of a SEQOSH accredited occupational health service only (paragraph 2.6.1);</li> <li>Certificate of Fitness for employment in alignment to industry Good Practice (paragraph 2.8); and</li> <li>All records in the English language, verified and signed by a suitable qualified clinician (paragraph 2.9).</li> </ul>
<b>NHS Employment Check Standard</b> Professional registration and qualification checks	Core	Professional registration and qualification checks in alignment to the <a href="#">best practice guidance published by NHS Employers</a> and additional requirements outlined within the framework Specification (Professional Registration & Qualification Checks, Paragraph 2 Additional Mandatory NHS Employment Check Standard Criteria of Section 6 Recruitment Procedures: Standards, Obligations & Assurance): <ul style="list-style-type: none"> <li>Monthly review of NMC PIN checks (paragraph 2.14).</li> </ul>
<b>NHS Employment Check Standard</b> Right to work checks	Core	Right to work checks in alignment to the <a href="#">best practice guidance published by NHS Employers</a> and additional requirements outlined within the framework Specification (Right to Work Checks, Paragraph 2 Additional Mandatory NHS Employment Check Standard Criteria of Section 6 Recruitment Procedures: Standards, Obligations & Assurance): <ul style="list-style-type: none"> <li>Policies and processes to spotting and supporting the victims of modern slavery (paragraph 2.17).</li> </ul>
<b>NHS Employment Check Standard</b> Employment history and reference checks	Core	Employment history and reference checks in alignment to the <a href="#">best practice guidance published by NHS Employers</a> and additional requirements outlined within the framework Specification (Employment History and Reference Checks, Paragraph 2 Additional Mandatory NHS Employment Check Standard Criteria of Section 6 Recruitment Procedures: Standards, Obligations & Assurance): <ul style="list-style-type: none"> <li>Minimum three (3) years' continuous employment history validated (paragraph 2.19).</li> </ul>
IR35	Core	Collate and record IR35 assurance evidence and relevant tax requirements for Temporary Workers as set out in paragraph 3 (Temporary Worker Obligations) of section 5 (Temporary Workers: Standards, Obligations & Assurance) of the Specification and in alignment to HMRC guidance and legislative requirements.  To meet this particular element of the Compliance Audit Criteria Suppliers are required to show evidence of:

		<ol style="list-style-type: none"> <li>1. Current processes for IR35 to ensure HMRC guidelines are met, this including how processes are implemented within the business;</li> <li>2. A contract between the Supplier and Umbrella company;</li> <li>3. An appropriate indemnity that appropriate Tax and National Insurance is being deducted;</li> <li>4. Supplier vetting and audit of Umbrella companies to ensure compliance with HMRC guidelines - utilisation of any <a href="#">tax avoidance scheme highlighted by HMRC</a> will result in an immediate Core Fail for this Compliance Audit Criteria element;</li> <li>5. The processes implemented internally within the Supplier for utilisation by staff when offering or implementing these services;</li> <li>6. Remittance from the Supplier to the Umbrella company;</li> <li>7. Three (3) consecutive payslips from the Umbrella company to the Temporary Worker showing appropriate deductions have been made, for a date period selected by the Auditor;</li> <li>8. Umbrella company RTI submission to HMRC which related to Temporary Worker payslips evidenced; and</li> <li>9. Where a Temporary Worker is paid outside of IR35, written confirmation from the Participating Authority that clearly demonstrates confirmation has been obtained prior to deployment of the Temporary Worker from a relevant board member or designated individual within the Participating Authority.</li> </ol>
<b>PAYE Evidence</b>	<b>Core</b>	Payslip evidenced from the Supplier to the Temporary Worker with appropriate deductions of Tax and National Insurance in alignment to HMRC, legislative and regulatory guidance.
<b>Insurance</b>	<b>Core</b>	Valid and in date insurance evidenced: <ul style="list-style-type: none"> <li>• Employers Liability (£5m);</li> <li>• Public Liability (£5m); and</li> <li>• Professional Indemnity (£5m).</li> </ul>
<b>Professional Industry Body Membership</b>	<b>Core</b>	Valid professional industry body membership evidenced (e.g. REC, APSCo etc).

ICO Registration	Core	Valid ICO registration <b>AND</b> ISO 27001 <b>or</b> Cyber Essentials <b>or</b> Cyber Essentials Plus evidenced.
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Criteria Grouping	Fail Type	Individual Lot 3b Compliance Audit Criteria Elements
Mandatory Training (aligned to the Core Skills Training Framework)	<b>GUIDANCE NOTE:</b> Mandatory training listed within this section of the Compliance Audit Criteria must be aligned to the Core Skills Training Framework (CSTF), with evidence of the training provider having a CSTF Declaration of Alignment if they are not on the list of approved list of Skills for Health providers. Where training is delivered by a non-contracted third-party, the Supplier is required to verify the training with the provider prior to the Temporary Worker being deployed, with written evidence retained on file and original documents received and verified.	
	Repetitive	<b>Triennial:</b> Conflict Resolution
	Repetitive	<b>Triennial:</b> Equality, Diversity & Human Rights.
	Repetitive	<b>Biennial:</b> Fire Safety training.
	Repetitive	<b>Triennial:</b> Health, Safety and Welfare.
	Repetitive	<b>Annual:</b> Level 2 Infection Prevention and Control. <b>Triennial:</b> Level 1 Infection Prevention and Control.
	Repetitive	<b>Annual:</b> Information Governance and Data Security.
	Repetitive	<b>Biennial:</b> Moving and Handling Level 2. <b>Triennial:</b> Moving and Handling Level 1.
	Repetitive	<b>Triennial:</b> Preventing Radicalisation.

	<b>Repetitive</b>	<b>Annual:</b> Resuscitation. Basic, Intermediate or Advanced life support (adult or paediatric as appropriate) in accordance with the relevant NHS Job Profile, compliant always with the Resuscitation Council UK, Core Skills Training Framework and guidelines of the Participating Authority delivered by means of a practical course.
	<b>Repetitive</b>	<b>Triennial:</b> Safeguarding Adults Level 1, 2 or 3.
	<b>Repetitive</b>	<b>Triennial:</b> Safeguarding Children Level 1, 2 or 3.
<b>Mandatory Training (not required to be aligned to the Core Skills Training Framework)</b>	<b>GUIDANCE NOTE:</b> Mandatory training listed within this section of the Compliance Audit Criteria is not required to be aligned to the Core Skills Training Framework (CSTF). Where training is delivered by a non-contracted third-party, the Supplier is required to verify the training with the provider prior to the Temporary Worker being deployed, with written evidence retained on file and original documents received and verified.	
	<b>Repetitive</b>	The Care Certificate (Healthcare Assistants only).
	<b>Repetitive</b>	<b>Annual:</b> Lone Worker Training.
	<b>Repetitive</b>	<b>Annual:</b> Counter Fraud Training.
	<b>Repetitive</b>	<b>Annual:</b> Mental Health Act & Mental Capacity Act (as appropriate to the Job Profile).
	<b>Repetitive</b>	<b>Annual:</b> Where Temporary Workers are required to utilise restrictive interventions (e.g. restraint techniques, physical intervention skills or holding procedures) which may fall within the following areas: <ul style="list-style-type: none"> <li>• Specialist commissioned healthcare provision;</li> <li>• Mental Health Trusts; and/or</li> <li>• Private Service Providers who provide care for individuals with some form of mental illness, learning disability, dementia or autism;</li> </ul> Temporary Worker training must be RRN Certified by a Certification Body that is licensed by the Restraint Reduction Network (RRN) and accredited by UKAS.



		Temporary Workers are able to move from to other organisations provided their training is current, and has been provided by a RRN Certified provider.
	<b>Repetitive</b>	<b>Annual:</b> Food Hygiene Awareness (as appropriate to the Job Profile).
	<b>Repetitive</b>	<b>Annual:</b> Medicine Management (as appropriate to the Job Profile).
	<b>Repetitive</b>	<b>Annual:</b> Tissue Viability (as appropriate to the Job Profile). Temporary Workers are able to evidence annual training or an annual self-declaration confirming they have kept this skills up to date in alignment to CPD and Revalidation requirements.
	<b>Repetitive</b>	<b>Annual:</b> Resuscitation of the newborn (Midwifery only).
	<b>Repetitive</b>	<b>Annual:</b> Interpretation of cardiotocograph (Midwifery only).
	<b>Repetitive</b>	<b>Annual:</b> Maternal resuscitation (Midwifery only).
	<b>Repetitive</b>	Any other mandatory training required by the Participating Authority or Professional and Regulatory Body in alignment to current and future regulatory or legislative directives. Examples of mandatory training that may be requested by the Participating Authority (in agreement with the Supplier) at the time of Order include but are not limited to: <ul style="list-style-type: none"> <li>• Sedation;</li> <li>• Duty of Care;</li> <li>• Person Centred Care;</li> <li>• Communication;</li> <li>• Consent;</li> <li>• Privacy and Dignity;</li> <li>• Fluids and Nutrition;</li> <li>• Mental Health Awareness;</li> <li>• Dementia Awareness;</li> <li>• Blood Transfusions; and</li> </ul>

		<ul style="list-style-type: none"> <li>Oliver McGowan Mandatory Training on Learning Disability and Autism.</li> </ul>
Legislative	Repetitive	Temporary Worker Working Time Regulation (WTR) verification opting in or out of the 48 hour weekly maximum.
	Repetitive	Agency Worker Regulation (AWR) entitlements (parity pay, benefits and day one rights) detailed in the Temporary Worker's contract or individual handbook.
	Repetitive	If applicable, recording post-12 week parity pay in alignment to the Agency Worker Regulations (PAYE only).
	Repetitive	Verified Temporary Worker Contract of Services or Terms of Engagement of Worker Seeker Agreement in place with the Supplier, including pension requirements (opt out as appropriate).
	Repetitive	Evidence that a Key Information Document (KID) has been shared with the Temporary Worker in alignment to the latest Employment Agency Standards inspectorate guidance.
Contractual	Repetitive	Month and year evidence of upcoming NHS appraisals.
	Repetitive	Performance check for all Temporary Workers within the first 6 months after start of assignment, with an annual appraisal thereafter.
	Repetitive	Evidence of appropriate Professional Indemnity Insurance requirements for placements where the Clinical Negligence Scheme for Trusts (CNST) is not applicable.
	Repetitive	Fully completed application form (that meets with Good Industry Practice), signed and dated by the Temporary Worker.
	Repetitive	Evidence the Temporary Worker's interview was undertaken by an appropriately trained, experienced and qualified individual in alignment to the role the Temporary Worker is being recruited for.
	Repetitive	Skills assessment verified as appropriate to the Job Profile (unqualified Temporary Workers only).
	Repetitive	Confidentiality, security checks and disclaimers signed by the Temporary Worker as appropriate.

	<b>Repetitive</b>	ID Badge verification (annually, with new photographic identification every two (2) years).
	<b>Repetitive</b>	Evidence of a signed declaration from the Temporary Worker confirming a Supplier Handbook has been received, read and understood.
	<b>Repetitive</b>	Professional qualifications verified, date stamped as 'Original Seen' with a legible name and signature of the individual receiving the document.
	<b>Repetitive</b>	Evidence of placement checklist sent to the Participating Authority, where required. If not applicable or needed by the Participating Authority, one-time written confirmation from the Participating Authority is required.
	<b>Repetitive</b>	Booking confirmation verified, approved and cross-matched with the timesheet and invoice to create a three-way match (must be identical or have clear approval for the submission of any increased hours).
	<b>Repetitive</b>	Timesheet verified and approved with the correct Band/Grade, hours, breaks and counter-fraud declaration in alignment to best practice Counter Fraud service guidelines.
	<b>Repetitive</b>	Invoice verified and approved with the correct Band/Grade, hours and total pay, commission and charge rate structure.
	<b>Repetitive</b>	Evidence the remittance to an Umbrella company/PSC matches the Temporary Worker Pay & billed to the Participating Authority (must be identical).
<b>Contractual (Supplier Only)</b>	<b>Repetitive</b>	Complaints procedure evidenced in alignment to paragraph 3 (Complaints Handling) of section 9 (Quality Assurance, Complaints Handling & Compliance Audit) of the Specification.
	<b>Repetitive</b>	Evidenced internal staff training in alignment to the relevant section of the Specification for the following areas: <ul style="list-style-type: none"> <li>• Receipt of third-party financial incentives, including upselling of third-party products and services to Temporary Workers;</li> <li>• Demonstrated process in place to manage any pause to the 12-week Agency Worker Regulation qualifying clock (PAYE only);</li> </ul>

		<ul style="list-style-type: none"><li>• Subcontracting processes and protocols, specifically ensuring that no supply is made by an Associated Company of the awarded framework Supplier to a Participating Authority;</li><li>• Maximum commission tolerances per Band/Grade, Shift and Specialty and embedded processes for managing 'Break Glass' requests from the Participating Authority;</li><li>• Introduction and Transfer Fee protocols (4 week notification to transfer a Temporary Worker without a fee); and</li><li>• Official registration of and implementation of the <a href="#">JobsAware</a> initiative.</li></ul>
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