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# Privacy Policy & Procedures

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## Complaints Procedure

JustPhysio/JustOT has the following formal procedure for the handling of complaints.

### General Principles:

Line managers will handle all verbal and written complaints, reporting to the Operations Director.

In the absence of the Operations Director, another Company Director will handle the complaint.

The Line Manager is responsible for monitoring the complaints and adhering to the response time detailed in this policy.

Complaints are monitored for emerging patterns, as detailed in this policy.

Poor performance issues are addressed in the Policy for Training, Development and Appraisals.

### Complaints raised by a Client, or Locum in respect of a JustPhysio/JustOT member of staff:

1. The complaint will be acknowledged in writing within 24 hours of receipt.
2. The member of staff concerned is to be contacted and informed of the matter.
3. In all instances the member of staff should be given the right of reply. This should be given in writing and copies supplied to all the relevant parties.
4. If the complaint relates to a work permit application, the 'Office of the Immigration Services Commissioner' (OISC), can be contacted at 5th Floor, Counting House, 53 Tooley Street, London, SE1 2QN, telephone 020 7211 1551.
5. On receipt of written confirmation of the complaint from the Client or Locum, JustPhysio/JustOT in conjunction with the Client/Locum will come to a decision as to the method by which the complaint should be handled. This will include deciding on how an investigation would be conducted, if an investigation were to be deemed necessary. This will depend on the nature of the complaint.
6. In all cases, the complaint will be recorded on the member of staff's file.
7. In all cases, JustPhysio/JustOT will keep all parties informed of developments at all times.

### Complaints raised by a JustPhysio/JustOT member of staff, a patient or a client's customer against a Client/Locum:

In the event of a complaint being raised by a JustPhysio/JustOT member of staff, a patient or a client's customer in respect of a work-based problem, the following will be adhered to:

1. In the first instance the complainant should contact the relevant JustPhysio/JustOT Line Manager.
2. Details of any verbal conversation will be recorded.
3. Advice will be given, and depending on the nature of the complaint, a written submission of the complaint may be requested by the Line Manager.
4. A decision will be made in conjunction with the complainer as to the next stage of the complaint if appropriate, for example if an investigation or further action is required.
5. In all cases the complaint will be recorded on the Client/Locum's records file.
6. Where serious complaints are upheld, JustPhysio/JustOT will take the appropriate action in terms of reporting responsibilities.
7. In all cases, JustPhysio/JustOT will keep all parties informed of developments at all times.

### Monitoring of Complaints:

#### JustPhysio/JustOT operates a system of monitoring complaints to identify patterns or trends. The system will operate as follows:

1. Each time a verbal or written complaint is made about a member of staff, Locum or client, a record will be made on the form that is for the purpose of recording such issues.
2. The relevant JustPhysio/JustOT Line Manager will check these forms on a regular basis. This will be for the purpose of identifying any trends or patterns that could otherwise be missed.
3. There will be a dedicated form for each Client, Locum and member of staff. This form will be completed regardless of other documentation and correspondence that may be required. These forms will be held in a complaints folder in alphabetical order, and each time an issue arises, the form will be completed. This should enable the manager monitoring the system to detect trends or patterns.
4. Should any trends or patterns be noticed, we will take necessary action, depending on the nature of the problem to address the issue.
5. If necessary JustPhysio/JustOT will seek guidance on how best to take action, from a relevant professional organisation such as ACAS (Arbitration and Conciliation Services), Health Professions Council, The Police, The Office of the Immigration Services Commissioner (OISC), or the relevant governing body to our individual medical professions

#### Timescales for Action:

1. Written complaints will be acknowledged in writing within 24 hours of receipt.
2. Details of planned investigations or other appropriate action to be taken will be sent within 5 days.
3. The complainant will be kept informed in writing, on a regular basis as to the progress of the investigation/action.
4. Upon conclusion, details of how the complaint has been resolved will be notified in writing to the relevant professional organisation/authority (eg the HPC, police etc) within 15 calendar days.
5. Upon conclusion of the investigation/action a detailed outcome response will be sent within 15 days unless further investigation required eg HPC / Police investigation.

In the event that any persons involved in a complaint are unsatisfied with the manner in which it has been handled, we would request that further contact is made in writing to the following director within the company: Edward Simpson, JustPhysio/JustOT, Ability House, 121 Brooker Road, Waltham Abbey, Essex EN9 1JH.

## Confidentiality Policy Including Computer Access

It is the policy of JustPhysio/JustOT to ensure, that all agency staff are made aware of their obligations and duties in terms of confidentiality issues in respect of:

1. Patients
2. Clients – the purchaser of the agency service
3. Information belonging to JustPhysio/JustOT

### JustPhysio/JustOT Confidentiality Policy:

JustPhysio/JustOT requires all Locums on our register to comply with the confidentiality policy of our company, the confidentiality Policies and Procedures of Clients and the relevant Code of professional conduct. This undertaking also encompasses the provisions and principles within the Data Protection Act 1984 and 1988, which concerns the protection of personal information. JustPhysio/JustOT operates systems to ensure security of information to the highest standards. This includes information held concerning Agency Workers, Clients and Patients.

In summary you must treat information about patients and clients as confidential and use it only for the purposes for which it was given. You must protect this information from improper disclosure at all times. Written information must be stored in a confidential place.

Agency staff must not disclose to any person (other than a person authorised by JustPhysio/JustOT or the Client) any information acquired by them in connection with the work assignments they undertake. This will include:

- The medical condition of or the treatment received by any patient
- The identity of any patient at any of the hospitals, clinics or work placement settings
- Confidential information concerning contracts, charges, procedures and other privileged information from JustPhysio/JustOT, or Clients

### Computer Access within the Clients Establishment:

As an Agency Worker you may be given Authorisation by the Client to gain access to certain computer systems and certain programs and data within those systems. You must not attempt alone, or in concert with others, to gain access to data or programs to which authorisation has not been given. In using any Client computer systems, as an agency worker you must:

- Observe the computer security instructions in respect of the proper use and protection of any password used in connection with such computer systems and if there is a need to use or insert into any computer any floppy disk, CD ROM disk, removable hard drive or any other device for the storage and transfer of data or programs;
- Not load any program into any computer via disk, typing, electronic data transfer or any other means;
- Not access any other computer or bulletin board or information service (including without limitation, the internet) except with specific prior authority from the Clients representative;
- Not download any files or connect any piece of computer equipment to any network or other item of computer equipment except with the prior authority of the Client's representative.

## Environmental Policy

JustPhysio/JustOT is committed to conducting its business in a manner that is both professional and ethical whilst at all times paying particular attention to its environmental responsibilities. These responsibilities will be discharged by implementing the following:

- Strict compliance with all relevant legal requirements, codes of practice and regulations.
- The organisation of our operations in order to minimise pollution and disturbance to our neighbours and the general public.
- The efficient use of materials and resources with particular regard to the long term sustainability of consumable items.
- The establishment and maintenance of management structures within our operating companies and divisions with specific responsibility for the implementation of environmental policy.
- Regular management reviews of the content and implementation of environmental policy with the objective of achieving best practice at all times.

### **Commitment:**

We are committed to our environmental policy and environmental protection. The policy will be implemented in all that we do via the aims and objectives stated in this document.

The objectives set out in this policy cannot be met effectively without the full co-operation of our staff, our clients and other business associates. Such co-operation is required from all JustPhysio/JustOT personnel and requested from all those with whom we interact.

### **Environmental aims and objectives:**

As one of the UK's leading medical recruitment companies, we recognise the significant part we have to play in the protection of the environment in which we live and work. Wherever possible we promote the use of sustainable resources whilst going about our day-to-day activities. In our capacity as a business and employer, we aim to:

- Ensure the effective management of resources thus reducing our impact on the natural environment.
- Foster employees' environmental awareness and concern, and integrate environmental management into training.
- Encourage the participation of our staff, candidates, suppliers and clients in our environmental goals.

### **Management activities:**

For us to achieve 'Environmental Best Practice' at all times, we must set in place specific strategies and processes. Although not exclusive, the following list indicates some of the key issues that are considered in our operational activities.

- Seek to prevent pollution.
- Seek to minimise waste.
- Identify and manage environmental risks and hazards.
- Set our own standards when none are in place.
- Provide prompt response to environmental incidents or emergencies.
- Encourage proactive response to government and other sponsored environmental initiatives.

## Equal Opportunities Policy

It is the Company's policy to provide equal opportunities in employment irrespective of sex, age, marital status, disability, sexuality, race, colour, and religion, ethnic, or national origin. The Company aims to treat all employees, clients, and other members of the public with whom the Company comes into contact with respect and dignity.

The Company seeks to employ a workforce that reflects the diverse community at large because it values the individual contribution of people irrespective of sex, age, marital status, disability, sexuality, race, colour, ethnic or national origin.

The Company recognises its legal obligations under the Race Relations, Sex Discrimination, Equal Pay and Disability Discrimination Acts and will treat employees, clients and members of the public with whom it comes into contact in a manner which is consistent with the spirit of these Acts.

### **Application of the Policy:**

This policy applies to all the Company's employees, irrespective of seniority and to all applicants for employment with the Company. If this policy of Equal Opportunities is not applied, valuable talent and potential may be wasted. Discrimination, harassment, and victimisation are not only illegal but also affect morale and can bring out a climate of insecurity and poor work performance. It is therefore vital that you understand your responsibilities.

The Company takes Equal Opportunities very seriously and the Company will not tolerate acts which breach this policy. It is your responsibility to ensure your conduct conforms to the expected standards and reflects this policy. Wilful failure to apply the policy or evidence of discrimination, harassment or victimisation may result in disciplinary action being taken against you and in serious cases, dismissal.

If you feel that the Policy has not been applied in your case you are encouraged to discuss the matter informally in the first instance with your manager. You are of course entitled to raise a formal complaint at any time and in such circumstances you are asked to use the Company's Grievance Procedure.

## Grievance Procedure

Most routine complaints and grievances are best resolved informally in discussion with your manager. Dealing with grievances in this way can often lead to a speedy resolution to problems and your manager may well be able to resolve the matter directly. Both you and your manager may find it helpful to keep a note of each informal meeting.

Where the grievance cannot be resolved informally it should be dealt with under the formal Standard Grievance Procedure (below).

### Standard Grievance Procedure:

**Stage 1:** You should put your grievance in writing to your manager (where the grievance is against your manager the matter should be raised with the next line of management).

**Stage 2:** The relevant manager will respond in writing to the grievance.

**Stage 3:** Your manager will invite you to attend at least one meeting in order to discuss the grievance. A work colleague or other representative of your choice may accompany you.

The meeting will not take place until you have informed us what the basis for the grievance was, when you put it to your manager and the company have had a reasonable opportunity to consider our response to that information. You must take all reasonable steps to attend the meeting.

Your manager will normally respond in writing again to the grievance within 4 working days of the meeting. If it is not possible to respond within that time you will be given an explanation for the delay and told when a response can be expected. You will be notified of your right to appeal against the decision if you are not satisfied with it.

The Company will attempt to ensure that each stage of this procedure is carried out without unreasonable delay, that the timing and location of meetings is reasonable and that meetings are conducted in a manner that enables both you and the company to explain their cases.

## Training & Development Policy

We are committed to the ongoing training and development of both our internal staff and our external working Candidates.

Please find the current mechanisms we employ to ensure that the training needs of our staff and Candidates are constantly monitored, measured and responded to.

### Internal Staff Training:

1. **Induction Training:** We operate a five-day comprehensive induction programme for all new employees. This includes among others, Company History, Social and Ethical responsibilities, Policies and Procedures, Relevant Legislation, Information technology and Customer Care training. This list is not exhaustive.
2. **Induction Booklet:** During induction all staff receive a detailed company handbook to refer to as a reference guide throughout their employment. A copy of this is available upon request.
3. **Professional Training:** We are committed to providing high quality training and development for all our staff regardless of their position in the company. The company offers, where relevant, the opportunity to study for professional qualifications. This is offered to all employees once the probationary period has been successfully completed. The company fund 50% of any agreed professional qualifications undertaken, the other 50% is funded by the employee, either through one lump sum payment or by monthly instalments where agreed. On successfully completing the course, the 50% contributed by the employee is fully refunded.
4. **Specialist Recruitment Training:** We actively encourage our Recruitment Consultants to undertake and achieve accreditation with the REC (Recruitment and Employment Confederation). The course provides vital knowledge of recruitment best practice and up to date legal requirements.
5. **Performance Monitoring - Staff Appraisals:** All staff are subject to performance appraisals on a six monthly basis. Prior to the appraisal, consideration is given to the employees training requirements in order to achieve future objectives. Methods of training are also considered by both the employee and the Manager. During the appraisal, any training undertaken in the previous twelve months is evaluated in order to show how it has contributed to the team's performance and benefited the individual. Where any training needs are identified, a 'Training Plan' is agreed by both the Employee and the Manager. This is evaluated and assessed in conjunction with the Company's objectives and available funding.

### External Working Candidates Training:

1. **Training & Continued Professional Development (CPD):** We actively encourage all our Candidates to undertake regular CPD activities and maintain an ongoing record of this. This ensures that our workforce are kept abreast of the latest developments, techniques and technology within their fields. In addition, we are also currently developing a CPD Scheme that will provide an annual training fund for all our working Candidates. This fund will be used towards costs for training seminars, relevant literature and other forms of professional development such as membership with professional bodies and/or recognised accreditation. Under the scheme, Candidates will earn monetary contributions based on their hours worked through our agency; the fund is proposed to reach up to £300 per annum per candidate. To support the scheme, a 'Learning Log' booklet is also being developed to enable our candidates to constantly record and monitor their CPD activities.
2. **Candidate Feedback Report (ongoing performance monitoring):** JustPhysio/JustOT constantly monitors the performance of its working candidates. Upon completion of each placement; our 'Candidate Feedback Report' will be forwarded for completion by the relevant Manager. This enables us to keep an exhaustive record of all Candidate performances. Any bad report will be investigated and could result in further training or the Locum being removed from our register.
3. **Regular Client meetings – Candidate Performance:** Our recruitment Consultants meet with their candidate's direct supervisor(s) at regular intervals to obtain feedback regarding their performance levels and identify any possible training requirements.
4. **On-Site Candidate Visits:** In addition, we also visit our working candidates 'on-site' during their placements on a regular basis to appraise their performance against their employer's requirements and identify any possible training requirements.