

Causeway Coast and Glens Borough Council

Internal Audit Report Human Resources – Use of Agency Staff

December 2020



INTERNAL AUDIT REPORT

Human Resources: Use of Agency Staff

Executive Summary

This internal audit was completed in accordance with the approved annual Internal Audit Plan for 2020/21. This report summarises the findings arising from a review of use of Agency Staff.

The table below summarises the key risks reviewed:

Risk	Number of recommendations & Priority rating		
	1	2	3
There may be insufficient and/or inadequate policies and procedures in relation to the use of agency staff which could lead to financial loss and reputational damage for the council.	-	2	-
There may be an inadequate or inefficient process supporting the hiring of agency staff leading to inefficient use of staff time and potential non-compliance with Council's own policies/procedures.	-	1	1
There is a risk that recruitment agency(ies) do not select and use workers which meet the essential qualifications and/or experience.	-	-	2
The use of agency staff may not be managed and tracked adequately leading to overspend on agency staff and financial loss to the council.	-	1	1
Total recommendations made	0	4	4

Based on our audit testing we are able to provide the following overall level of assurance:

Limited

There are significant weaknesses within the governance, risk management and control framework which, if not addressed, could lead to the system objectives not being achieved.

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Distribution:	Audit Committee Chief Executive Director of Corporate Services Director of Environmental Services Director of Leisure & Development Head of Organisational Development & Human Resources

All matters contained in this report came to our attention while conducting normal internal audit work. Whilst we are able to provide an overall level of assurance based on our audit work, unlike a special investigation, this work will not necessarily reveal every issue that may exist in the Council's internal control system.

1 Objective

The areas for inclusion in the scope of the audit were determined through discussion with management and considered the main risks facing Human Resources in relation to use of agency staff and a review of the key systems and controls in place to address these. The objective was to ensure that:

- There are adequate policies/procedures for the use of agency staff.
- There is an adequate process for support hiring of agency staff and that it is efficient
- The recruitment agency is providing workers which meet the specified criteria
- The use of agency staff is managed and tracked adequately

2 Background

Causeway Coast and Glens Borough Council is a significant employer in the area, currently employing 663 members of staff on a full time, part time and casual basis and includes agency staff. Human resources matters are dealt with by Organisational Development and Human Resources, within the Corporate Services Directorate.

Recruitment is carried out in line with the “Code of Procedures on Recruitment and Selection” developed by the Local Government Staff Commission (LGSC) for Northern Ireland. This Code is a statutory Code based on Section 40 (4) (b) of the Local Government Act 1972.

Since the amalgamation of the legacy councils, Causeway Coast and Glens have been working on restructuring their staff structure, this is currently 50% completed. The three largest departments are Sports & Well-Being, Operations and Estates. Sports and Wellbeing are undergoing a review of Leisure Management models and are in consultation with the Trades Unions. The structures for the delivery of the chosen model is part of this review. In parallel with this review, work is progressing with job descriptions.

The Estates department have agreed their structure with Council and are currently consulting with the Trade Unions on job descriptions.

The Operations Department have also agreed their structure and are preparing job descriptions for review with the Trade Unions.

As the council restructured, agency staff were and are used to fill gaps until the restructuring has been completed and positions filled. The Local Government Audit Report in June 2019 stated “Historically, most agency staff have been temporary and seasonal in nature. However, during this period of significant organisational change, there has been an increased dependency within some councils on agency staff to help deliver services, until they finalise their staffing structures and complements” and it also highlighted that Causeway Coast and Glens had the highest percentage of staffing costs for agency workers based on 17-18 financial records at approx. 9%.

3 Risks

The risks identified by Internal Audit relating to HR: Use of Agency Staff and agreed with management are as follows

1. There may be insufficient and/or inadequate policies and procedures in relation to the use of agency staff which could lead to financial loss and reputational damage for the council.
2. There may be an inadequate or inefficient process supporting the hiring of agency staff leading to inefficient use of staff time and potential non-compliance with Council's own policies/procedures.
3. There is a risk that recruitment agency(ies) do not select and use workers which meet the essential qualifications and/or experience.
4. The use of agency staff may not be managed and tracked adequately leading to overspend on agency staff and financial loss to the council.

4 Audit Approach

Our audit fieldwork comprised:

- Documenting the systems via discussions with key staff
- Consideration of the key risks within each audit area
- Examining relevant documentation
- Carrying out a preliminary evaluation of the arrangements and controls in operation generally within the Council
- Testing the key arrangements and controls
- Testing the completeness and accuracy of records.

5 Findings and Recommendations

This section of the report sets out our findings in relation to control issues identified and recommendations. A summary of all the key controls that we considered is included in Appendix II to this report.

Risk 1 – Inadequate Policies and Procedures

ISSUE 1 – Agency Worker Managers' Guidelines

- a) **Observation-** HR currently have guidelines in place for managers which refer to the law and best practice on engaging and managing agency workers. Audit has also been advised that the guidelines are a live working document and there have been

various versions however the different versions have not been tracked, saved and documented. The version that audit reviewed is available for officers on the Staff Portal and appears to have been in place since April 2017. Audit was provided with a separate document from November 2019 with more recent notes, but this is not available on the staff portal. It does state that it should be read in conjunction with the existing guidelines but is not as easily available as the guidelines.

The guidelines on the portal refer to Agency Workers as “an additional staffing resource” who can be engaged for anything from a few hours or weeks at a time. The documents provide examples of circumstances when agency workers would normally be employed. However, this document does not explicitly explain what Council’s agreed policy is on the use of agency workers.

A policy for agency workers would normally make it clear that in certain circumstances the Council may need to engage agency staff in order to comply with statutory responsibilities and to meet the demands of the service. However, an Agency Worker will only be used when there is a sound financial and business need to do so and it is accepted in principle that the employment of agency workers should only be used for short term cover.

b) Implication- In the absence of a documented reference to Council’s agreed policy on the use of Agency Workers and as the guidelines are not a formal and regularly updated procedure there is the potential for the guidelines not to be followed leading to noncompliance with council’s own guidelines and inadequate and/or inefficient use of agency staff.

c) Priority Rating- 2

d) Recommendation- HR should review and update the guidelines, and include the updated guidance note from 2019 in the main guidelines document. HR should also enhance the document by clearly stating council’s agreed policy on the use of agency staff. The policy and procedure should be agreed by the relevant Council committee and uploaded onto the staff portal. All directors, heads of service and managers should be made aware of the policy and procedure and advised of any updates to the document following regular periodic review.

e) Management Response- ODHR will review and update the guidelines. A Policy / procedure will be developed for agreement by the relevant Council committee and uploaded onto the staff portal once agreed. In the interim the audit findings will be shared with the ODHR team to start implementation of the issues raised.

**f) Responsible Officer & Implementation Date- Head of ODHR
Policy drafted by 31 March 2021**

ISSUE 2 – Tracking Long-term use of Agency Staff

a) Observation- Audit was advised that tracking/monitoring long-term use of agency staff is the responsibility of the individual Heads of Service (HOS) and also noted that the current (Agency Staff) guidelines require quarterly review by line managers, facilitated by OD/HR, of the length of assignments for each agency worker. If the agency worker's period is to be extended the line manager needs to provide reasoning as to why the placement is continuing. To audit's knowledge these quarterly reviews are not occurring. Many agency staff are filling permanent posts in a long-term capacity where job descriptions and roles are yet to be finalised by Council. Audit has been advised that there are various reasons for the delays in finalising job descriptions including difficulty in getting agreement with Trade Unions. Until these posts have been agreed they cannot be permanently filled. In that situation agency staff contracts continue to be rolled forward with little focus on quarterly reviews and justification.

HR also retain spreadsheets of agency staff usage which analyses agency workers into seasonal, sick/maternity cover, permanent vacancy etc. A detailed review of these levels of agency staff took place in April/May 2020 at the SLT level. Audit discussed monitoring of Agency Staffing with Council's Directors and found HR Spreadsheets are issued to Directors (usually monthly) who review these and discuss the situation with the respective HOS. There has been an increased focus on discussing the analysis of Agency Staff numbers with managers in the last 6 months.

Service Reviews are underway in both the Leisure and Development Directorate and the Environmental Services Directorate, to fill permanent staffing requirements and reduce the reliance on agency staff.

b) Implication- In the absence of the quarterly review of the length of assignments for each agency worker by respective managers (as required by the Guidelines for use of Agency Staff) there is non-compliance with Council's own Guidelines and an increased risk of inefficient practices leading to over reliance on agency staff, possible lack of value for money for Council, or additional employment legislative complexity around long term agency use.

c) Priority Rating- 2

d) Recommendation-
In line with the current (Agency Staff) guidelines quarterly reviews by line managers, should be undertaken of the length of all Agency Staff assignments and the reasons for long term use should be discussed with the relevant director who should actively challenge the numbers of agency staff in long-term posts.

e) Management Response- HR Business Partners discuss Agency Staff assignments with HoS although this has not been formally documented in the past. This will be formalised going forward, with a quarterly report prepared for SLT review.

f) Responsible Officer & Implementation Date- Head of ODHR
Implementation date December 2020

Risk 2 – Inadequate or Inefficient Processes for Hiring Agency Staff

ISSUE 3 – Agency Worker Request Form

a) Observation- Human Resources have put in place an Agency Worker Request form to be used by Managers and Heads of Service. This request form does include sections to provide a brief business case and how long the post/assignment should last but the form does not include sections such as:

- Confirmation that temporary re-deployment of current staff was considered and reasons why this was found not to be practical.
- If the agency staff is to fill a post while a permanent position is being created or advertised; the details and target dates for the planned permanent recruitment should be included
- Required skills and qualifications for the position

Audit notes that there are at times job descriptions attached to an emailed agency staff request form.

Audit was advised that HR is trialling a new approach in relation to the use of Agency Staff. This consists of creating and agreeing an end date to the assignment before a request is completed with the agency. As a result when the agency places a worker into the assignment they know when the assignment will end and if the assignment is not completed within that time a new request for an agency worker must be completed with a justification to have the agency worker continue or a new worker put in place.

b) Implication- As the request form does not always contain details of a job description; skills qualifications needed; confirmation that re-deployment was considered and target dates for permanent recruitment (if applicable) there is a risk of inefficient or inadequate hiring of agency staff

c) Priority Rating- 3

d) Recommendation- Human Resources should consider updating the request form to include additional information:

- a statement that re-deployment was considered,
- planned dates for planned permanent recruitment if it is to cover a vacant permanent post
- required skills and qualifications and/or job description
- in line with HR's new approach - an end date for the assignment

e) Management Response-

ODHR will update the request form to include additional information:

- a statement that re-deployment was considered
- planned dates for permanent recruitment if it is to cover a vacant permanent post
- in line with HR's new approach - an end date for the assignment

ODHR will ensure the required skills and qualifications (JD & PS) for the position are always attached to the email and retained on file.

**f) Responsible Officer & Implementation Date- Head of ODHR
Agency Worker Request Form to be reviewed by December 2020**

ISSUE 4 – Request Forms Completion and Approval

- a) Observation-** Audit tested a sample of 30 request forms, 15 from Leisure & Development and 15 from Environmental Services and found the following
- on 3 occasions director approval was not attained due to annual leave,
 - on 3 occasions there was no evidence that there was director approval, but reason was given or HoS advised that Director had given approval, and
 - 5 occasions where there was either no evidence of approval or no signature from the HOS.

Whilst reviewing the sample of request forms audit acknowledges that the business case was completed 29 times out of 30. In the remaining instance the relevant page was missing from the request form. However, in many business cases the information provided was very brief.

Audit acknowledges that from the sample selected there is evidence that request forms went through HR as in each case an agency worker was engaged. It was however noted, that HR fully completed and signed off the relevant sections to verify receipt of the request and forwarding of the request to the agency for 10 out of the 30 request forms sampled

- b) Implication-** If evidence of proper approval of each agency staff recruited is not in place there is an increased risk of noncompliance with council's own guidelines leading to inadequate hiring processes and agency workers being placed without adequate justification.

- c) Priority Rating-** 3

- d) Recommendation-** All relevant staff should be reminded of the importance of fully completing the AW1 Request Form Agency Worker document to request an agency worker, and all Managers, HOS and directors should be reminded to sign the form. In circumstances where a Director is not available to provide approval (e.g. due to being on leave) and the request cannot wait until the Director has returned the Director must be asked to provide retrospective approval upon return to the office. Those completing the request form should be reminded to provide as much detail as possible within the business case section. HR should also ensure that they sign and date the form upon receipt and also sign and date it when it has been processed to the agency or retain this detail on a tracking spreadsheet.

- e) Management Response-**

OD HR will not accept any forms which have not been signed by the relevant signatories.

The business case section should always be completed in full and ODHR will not accept any forms which have not been completed in full.

ODHR will ensure to sign and date the form upon receipt and also sign and date the form when it has been processed to the agency.

Due to current remote working arrangements an electronic signature or email trail confirming approval from the relevant signatories is required.

These arrangements will be communicated in the forthcoming Policy.

- f) Responsible Officer & Implementation Date- Head of ODHR
Immediate implementation December 2020**

Risk 3 – Agency May Not Select Workers to Meet Essential Criteria

ISSUE 5 – Documented Process to Resolve Potential Issues with Agency Staff

a) Observation- Audit was advised that there is a process to facilitate reporting of and resolution of service area issues with agency staff however, it is not documented in detail. Audit was advised that if there is an issue with an agency worker the service line manager should end the specific assignment that worker is carrying out and contact the HR Business Partner. The HR Business Partner will then contact the agency and agree to have a new agency worker started asap. Audit acknowledges that within the guidelines there is a paragraph that states the line manager should contact the HR Business Partner which also includes 4 bullet points of what not to do. Audit was advised that it is the responsibility of the agency to discipline staff in such instances and they are not within the scope of Council's disciplinary procedure. Audit notes that the terms and conditions of the specification during the tender process to engage an employment agency states that "Council will be responsible for acts, errors and omissions of Temporary Agency Workers, be they wilful, negligent or otherwise as though the Temporary Agency Workers were employed by the Council on a contract of service and were the Council's servants."

b) Implication- Without a clearly documented procedure there is a risk that a line manager or head of service may not know what to do when there is an issue with an agency worker. Any lack of clarity around responsibilities for performance of and disciplining of Agency staff increases the risk that issues with Agency staff are not adequately resolved.

c) Priority Rating- 2

d) Recommendation- Council should ensure that there is clarity around the precise nature of the triangular relationship between Council, the agency and agency staff in relation to responsibility for and management of performance/errors/wrongful acts of agency staff. OD/HR should document the current process for dealing with issues with performance of agency staff and make it available to the HR team and relevant Managers and Heads of Service. Line managers can then refer to the document and be more certain of their actions when they are dealing with such situations.

e) Management Response- New Council Policy/Procedure to address this issue. Liaise with agency regarding the management of performance/errors/wrongful acts of agency staff, to inform the Policy.

- f) Responsible Officer & Implementation Date- Head of ODHR
Policy to be drafted by 31 March 2021**

ISSUE 6 – Qualifications of Agency Staff

- a) Observation-** Audit sampled 20 agency workers. From the sample Audit was provided with 11 sets of qualifications, we were advised that for some posts in the sample there were no specific qualifications needed e.g. “general cleaning operative”. However, Audit has also been advised that there have been occasions in the past, especially at the start of the business relationship with the agency when workers were being provided to council who did not have the relevant qualifications or experience. Audit acknowledges that reviewing qualifications and experience is part of the hiring process which the agency has full responsibility for.
- b) Implication-** Without assurance that the agency is checking staff qualifications and experience there is a continuing risk of agency workers being placed into positions within the council that they are not suited to. This can result in requests for replacements from the Council business area for unsuitable staff provided by the agency and/or increased Health and Safety issues.
- c) Priority Rating-** 3
- d) Recommendation-** HR should consider undertaking routine spot checks of qualifications and documenting these checks to provide assurance that the agency is using candidates with the necessary qualifications and experience. Alternatively, as the agency is responsible for carrying out all checks and references, they must continue to do so, but must also provide evidence of these to Council managers in a timely manner in advance of an agency staff worker reporting for duty. The relevant hiring manager should ensure they receive and review these documents prior to the candidate starting work.
- e) Management Response-** ODHR will carry out routine spot checks on a monthly basis, for a trial period of 6 months subject to review. A sample will be chosen at random (20% of new starts for that month across different service areas and job roles) Pending the results, and assurances following the 6 month period, the trial period may be extended or reduced.
- f) Responsible Officer & Implementation Date-** January 2021

Risk 4 – The Agency Contract May not be Monitored and Managed.

ISSUE 7 –Assessing the Performance of the Contracted Agency

- a) Observation-** Audit was advised that at the start of the business relationship (in 2017 and 2018) there were more formally recorded meetings between council and the agency. However, as time progressed issues were being dealt with using fewer formal meetings. Communication was based on more informal conversations, using emails and phone calls which occurred regularly but were not always documented. Audit notes that the contract with the agency can be renewed annually (up until 2022)

<p>"subject to satisfactory performance". However, there is no documented formal annual review on file.</p>
<p>b) Implication- In the absence of a formally documented review of the performance of the agency there is an increased risk that the agency is not providing an efficient or value for money service to Council.</p>
<p>c) Priority Rating- 3</p>
<p>d) Recommendation- A formally documented review of the performance of the agency should be carried out at least annually. This should provide documented evidence that any issues, with the agency and the service they provide, which have been identified by Council officers and HR, have been resolved. Any interim meetings to discuss issues arising during the year should be documented and any issues raised should be followed up and noted as resolved. A tracker of issues being raised should be retained by HR noting the issue; the date raised, the date the agency was informed, and the date was resolved. (this should form the basis of any review of the agency).</p>
<p>e) Management Response-</p> <ul style="list-style-type: none"> • Quarterly meeting between the Agency, Head of ODHR and any other relevant Director to review any issues • ODHR to open a tracker spreadsheet to detail all issues (noting the issue; the date raised, the date the agency was informed, and the date was resolved) • All meetings with the Agency to be documented / recorded • Initial meeting held on 26th November 2020, with Directors, ODHR and Managing Director Staffline (NI)
<p>f) Responsible Officer & Implementation Date- Head of ODHR Initiate quarterly meeting by 31 January 2021 Initiate tracker spreadsheet by 31 January 2021</p>

ISSUE 8 – Oversight of Use and Cost of Agency Staff

- a) Observation-** As mentioned in Issue 2 there is a lack of evidence of monitoring of the use of Agency Staff by line managers. Audit has reviewed spreadsheets retained by OD/HR and found that these contain the details of:
- numbers of agency staff per business area
 - numbers of agency staff in post for more than 1 year
 - the reasons for the use of agency staff e.g.
 - vacancy
 - seasonal
 - funded
 - maternity or other cover
 - cost,
 - salary scales, length of service, etc
- Spreadsheets are e-mailed by OD/HR to the SLT members monthly. Audit was advised that these spreadsheets are reviewed by Directors and discussed with their relevant Heads of Service at management and staff meetings.

Audit discussed the review of agency staff with a number of Council Directors and found there has been an increased focus on monitoring of agency staff levels at the Directorate level (in the last 6 months).

Audit reviewed the SMT/SLT minutes from November 2018 until August 2020. There was evidence of some discussion of agency staffing but there are long periods where the issue of agency staffing was not examined at these meetings. The use of agency staff is not a standing item at SLT meetings and there is no reporting of detailed figures at these meetings. Audit did note that in an SLT meeting in August 2020 that the CEO requested that the approval of all outstanding job descriptions be completed by December 2020. It was also reported to SLT in late August the additional analysis work being carried out by OD/HR on agency staff numbers.

b) Implication- In the absence of continuous detailed scrutiny of the agency numbers (especially where they are in post for more than 1 year) by SLT and in the absence of agreed actions by SLT to reduce the level of agency staffing there is an increased risk of continuing over reliance on agency staff.

c) Priority Rating- 2

d) Recommendation- Audit acknowledges that in the last 6 months that there has been increased focus on reducing the reliance on Agency Staff by SLT. However, it is recommended that to keep the focus on this matter, Agency staff numbers and costs should be an agenda item at SLT meetings (at least once per month). The monthly HR spreadsheets (or a summary report of these figures) should be discussed at SLT meetings and the various reasons for the long-term use of agency staff should be documented in detail and actions identified to reduce the numbers of agency staff. Progress of the actions to reduce agency staff costs should be monitored, discussed and documented at SLT meetings.

e) Management Response- Directors are provided with the agency overview and the detail for their respective areas on a monthly basis. SLT will add 'Agency Review' as an agenda item on a monthly basis, to review the monthly information provided by ODHR

- ODHR to send the monthly overview to the Heads of Service
- Directors will continue to discuss at their meetings with Heads of Service
- ODHR will continue to challenge each request and compare against agreed structure. In-house transformation/re-organisation is progressing as approved and this will further reduce the need for and dependency on Agency staff.
- ODHR are preparing quarterly reports which will be provided to the Director / Committee and include detail on Agency workers usage and cost.

f) Responsible Officer & Implementation Date- Head of ODHR
Implementation by 31 January 2021

6 Appendix I: Definition of Assurance Ratings and Hierarchy of Findings

Satisfactory Assurance

Evaluation opinion: Overall there is a satisfactory system of governance, risk management and control. While there may be some residual risk identified this should not significantly impact on the achievement of system objectives.

Limited Assurance

Evaluation opinion: There are significant weaknesses within the governance, risk management and control framework which, if not addressed, could lead to the system objectives not being achieved.

Unacceptable Assurance

Evaluation opinion: The system of governance, risk management and control has failed or there is a real and substantial risk that the system will fail to meet its objectives.

Hierarchy of Findings

This audit report records only the main findings. As a guide to management and to reflect current thinking on risk management we have categorised our recommendations according to the perceived level of risk. The categories are as follows:

Priority 1: Failure to implement the recommendation is likely to result in a major failure of a key organisational objective, significant damage to the reputation of the organisation or the misuse of public funds.

Priority 2: Failure to implement the recommendation could result in the failure of an important organisational objective or could have some impact on a key organisational objective.

Priority 3: Failure to implement the recommendation could lead to an increased risk exposure.

7 Appendix II: Summary of Key Controls Reviewed

Risk	Key Controls
<p>There may be insufficient and/or inadequate policies and procedures in relation to the use of agency staff which could lead to financial loss and reputational damage for the council.</p>	<ul style="list-style-type: none"> • There are adequate policies and procedures in place • The policy has been approved • The policy is reviewed on a regular basis • The policy has been provided to all relevant staff and they have acknowledged receipt and/or understanding. • The procedure of obtaining agency staff is documented. • The policy documents how long agency staff are to be used (short-term) • Long-term use of agency staff is tracked, and regular rationale for continued use should be provided and regularly reviewed until a permanent employee has been recruited • Managers must obtain approval at an appropriate level in Council before seeking to recruit an agency worker
<p>There may be an inadequate or inefficient process supporting the hiring of agency staff leading to inefficient use of staff time and potential non-compliance with Council's own policies/procedures.</p>	<ul style="list-style-type: none"> • The process of hiring agency staff is documented and available for relevant staff. • A template is in place for requesting the recruitment of agency staff • The template includes all relevant information: <ul style="list-style-type: none"> ○ Justification for using agency staff rather than recruiting for a permanent post ○ Confirmation that temporary re-deployment of current staff was considered and reasons why this was found not to be practical ○ Expected duration of the use of the agency staff ○ If the agency staff is to fill a post while a permanent position is being created or advertised; the details and target dates for the permanent recruitment should be included ○ Required skills and qualifications for the position • Approval from the relevant budget holder must be obtained before seeking to employ an agency worker • Approval must be obtained from senior management - Head of Service • A business case or budget review has been completed prior to recruitment of agency staff and before the requisition form is completed. • Only authorised staff are involved in the recruitment of agency staff • Approved requests for agency staff should be brought to Human Resources. • Human Resources are responsible for obtaining agency staff from the recruitment agency/agencies
<p>There is a risk that recruitment agency(ies) do not select and use workers which meet the essential qualifications and/or experience.</p>	<ul style="list-style-type: none"> • There is a contract/SLA with the recruitment agency/agencies in place. • The SLA has appropriate service delivery targets in place • HR monitors the performance of the agency and their compliance with the SLA targets • HR has a process in place to facilitate reporting of and resolution of service areas issues with agency staff

Risk	Key Controls
<p>The use of agency staff may not be managed and tracked adequately leading to overspend on agency staff and financial loss to the council.</p>	<ul style="list-style-type: none"> ○ Service areas know who to contact in HR with agency staff related issues ○ HR have regular contact with the agency ○ The agency has a person nominated as the main contact for the Council ○ Meetings are held between HR and the agency to discuss issues and review SLA targets ● The recruitment agency must be able to provide evidence of qualifications and/or experience of any candidate being put forward for the position upon request. The template used for requesting the recruitment of an agency person includes clear details of the roles essential qualifications and/or experience ● These details of the essential qualifications and/or experience for each role (fulfilled) using an agency staff have been reviewed and approved at the appropriate levels in Council e.g. manager/Head of Service ● HR have an adequate system in place to record details of numbers and cost of agency staff recruited ● All line managers are aware of the system and provides HR with up-to-date information. ● HR reports on the numbers and cost of agency staff on a regular basis to SLT ● Numbers and costs of agency staff should be reported regularly to Managers and Directors by service area and Directorate ● Numbers and costs of agency staff should be reported regularly to Elected members by service area and Directorate ● HR compares the actual cost of agency staff vs projected cost of permanent employees ● HR should hold all completed and signed agency staff requests centrally. ● HR monitors the length of service of agency staff