



An Coimisiún
um Cheapacháin
Seirbhíse Poiblí
Commission
for Public Service
Appointments

Audit of Policies and Practices relating to Local Recruitment
and Appointments by HR Departments for HSE Hospital Groups :
(i) University Hospital Waterford
(ii) University Hospital Limerick

AUDIT REPORT
March 2016

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Chapter 1 - Introduction and Background

1.1 Introduction

This report has been prepared under section 43 (5) and section 13 of the Public Service Management (Recruitment and Appointments) Act 2004.

The report provides an account of an audit of the policies and practices governing local appointments made by Human Resources (HR) Departments in the Hospital Groups in Waterford and Limerick during 2015.

The Commission is committed to undertaking audits in a spirit of improvement and with the goal of sharing knowledge and best practice rather than focusing solely on compliance.

1.2 The Public Service Management (Recruitment and Appointments) Act 2004

Appointment processes to all positions within the remit of the Public Service Management (Recruitment and Appointments) Act 2004 are subject to Codes of Practice published by the Commission. The Codes set out the regulatory framework for such appointment processes and centre on five recruitment principles to ensure all appointments are made following a competitive merit-based recruitment process that is conducted in an open, transparent and accountable manner. Through its audit function, the Commission safeguards the standards established in the Codes of Practice and ensures compliance by the Office Holder with these standards for the recruitment of staff to positions within the organisation.

1.3 Appointments in the HSE

With effect from 1 April 2005 recruitment for appointments to positions in the HSE is subject to the provisions of the Public Service Management (Recruitment and Appointments) Act 2004. All appointments must be made in accordance with the standards in the relevant Code of Practice that applies to the circumstances of the appointment(s);

- (i) Code of Practice for Appointment to Positions in the Civil Service and Public Service
- (ii) Code of Practice for Emergency Short-Term Appointments to Positions in the Health Service Executive
- (iii) Code of Practice for Atypical Appointments to Positions in the Civil Service and Certain Public Bodies

1.4 Purpose of the Audit

The purpose of this audit is to confirm compliance by the Office Holder with the recruitment principles and to ensure that procedures in place for managing appointment processes are designed and operated in accordance with the Code of Practice.

1.5 Details of Work Undertaken and Areas Reviewed

The audit focussed on reviewing a selected sample of appointment processes conducted during 2015 in University Hospital Waterford and University Hospital Limerick.

The audit entailed an examination of the competition file for each of the processes selected, together with meetings and discussions with key personnel in the HR Departments of both Hospitals who have responsibility for the management of recruitment and selection within each Hospital Group.

1.6 Acknowledgements

The Commission would like to thank the personnel in the HR Departments in University Hospital Waterford and University Hospital Limerick who gave their time and cooperation to this audit process.

Chapter 2 – HSE Policies and Procedures for Open External Recruitment and Confined Appointments on a Permanent or Temporary Basis

2.1 Introduction

The National Recruitment Service (NRS) is responsible for the delivery of recruitment services for the HSE. While their aim is to deliver these services in accordance with best practice and in a timely manner, it is not always possible to respond to all recruitment needs due to the volume of appointments to be made across all services in the HSE and the consequent demands on the NRS's limited resources.

In response to the apparent increasing demands to fill positions, the HSE has introduced arrangements to permit the devolution of recruitment activity to local HR or the local Service Managers. Guidelines are available for local managers who are selecting staff for appointment from local campaigns which can be conducted with the assistance of the NRS.

Before any recruitment campaign is initiated at a local level for either permanent or temporary appointments, the local manager must obtain prior approval from the NRS Manager to run the campaign. This prior approval is not required however for appointments to positions that do not come under the recruitment remit of the NRS such as Non-Consultant Hospital Doctors (NCHDs), Support Interns and Homehelps. In addition to these appointments General Staff Nurses (Registered Nurses and Pre-registration Graduate Nurses) are recruited in acute centres. The NRS advised that they also have a current General Staff Nurse panel in place which it intends to supplement from a 2016 Graduate Staff Nurse recruitment campaign.

Generally NRS approval issues for temporary campaigns only. However if there is a need for a permanent appointment within a particular time frame that cannot be accommodated by the NRS, authorisation will be given to a local area to run a campaign to fill vacancies on a permanent and temporary basis.

Even though the management of campaigns may be devolved, there is generally a "joint" approach to local recruitment. Where recruitment campaigns are devolved to local HR, the local HR Manager or the Service Manager responsible is generally asked to return the names of successful candidates to the NRS so that the NRS issues the job offer and the contract. In certain circumstances where the local area has a long established HR office with strong recruitment experience, authorisation may be given to conduct the full recruitment process from advertisement to appointment stage. This is decided on a case by case basis.

Before initiating an appointment process for permanent staff, Local Service Managers are required to complete an Approval to Hire Form and have that form approved at an appropriate level. In situations where the NRS cannot conduct the specific campaign in the time needed for service demand, the

NRS Manager can authorise a local HR or Service Manager to carry out an open external recruitment campaign at local level.

The NRS has advised that the HSE's regional and local Offices have staff with a significant amount of recruitment experience and expertise. Local recruitment units are encouraged to apply the best practice recruitment model developed by the NRS (guidelines and documentation are available). A large cohort of senior HSE staff have been trained to act on interview boards organised by the NRS and are equipped with the skills needed to act on Boards. These same employees are available to work on interview boards managed locally.

In situations where recruitment is carried out at local level the local Service Manager would be involved in the selection process however appointments, including the clearances and contracting stages, must be done by the NRS or in some cases by the local or regional HR under the governance of the NRS.

2.2 Guidelines/Procedures

There are a number of HSE guidance documents available for local HR and Service Managers to assist and provide support for those involved in recruitment and selection at local level.

These Guidelines cover all aspects of the recruitment campaign including pre-advertisement, advertisement, applications, interviews and appointments. Further information is available in relation to the governing legislation and responsibilities for recruitment, guidelines for conducting structured interviews including the assessment process and sample marking sheets, and sample letters to be used in communicating with candidates. All local HR and Service Managers are required to be familiar with the guidelines and implement the actions for the selection of staff from local campaigns. They are also requested to sign a Declaration of Understanding of their responsibilities under recruitment legislation and of the selection process for local appointments.

There is a guidance document available as a resource to support health service managers in the management of temporary appointments that are confined to HSE employees. This document sets out the guidelines for filling

- (i) temporary appointments of up to three months where the appointed person is required to take on the role and responsibility of the higher grade without pay within a specific defined period not exceeding 12 weeks, and
- (ii) temporary appointments of more than three months duration which in turn creates a liability for additional costs to the budget holder. These appointments must be submitted on the relevant form to be sanctioned before being forwarded to the relevant recruitment function at local or regional level for the recruitment and selection process to be conducted. All such appointments must follow the local recruitment process under the remit of the NRS as set out in the guidance documents available on the HSE intranet and website.

The NRS also provides expert advice and appropriate documentation to all those involved in the management of recruitment and selection at local level, particularly to ensure that all aspects of the process are conducted in accordance with the Codes of Practice and in compliance with the terms and conditions of the HSE Recruitment Licence.

2.3 Codes of Practice

All appointments in the HSE must be made in compliance with the standards set out in the relevant Code of Practice that applies to the circumstances of the appointment;

(i) Code of Practice for Appointment to Positions in the Civil Service and Public Service

This Code sets out the principles to be observed in respect of both external and internal appointments to positions in public bodies within the Commission's remit including the HSE

(ii) Code of Practice for Emergency Short-Term Appointments to Positions in the Health Service Executive

This Code sets out the principles to be observed in respect of recruitment and selection procedures and practices carried out by the HSE in situations where it is necessary to make emergency short-term appointments to specific positions in the HSE to meet critical needs.

(iii) Code of Practice for Atypical Appointments to Positions in the Civil Service and Certain Public Bodies

This Code sets out the principles that apply to appointment processes in the Civil Service and certain public bodies, including the HSE, where standard recruitment and selection approaches may not be appropriate to meet critical short-term needs and it is necessary to assign a specific serving civil servant or public servant to higher duties on a temporary basis for a defined short-term period to address such needs.

Chapter 3 - Audit Findings in respect of Local Recruitment and Appointments in University Hospital Limerick and University Hospital Waterford

3.1 Overview of Local Appointments in University Hospital Limerick (UHL)

UL hospitals is a group of six hospitals in the Mid-West that offer a range of services eg accident and emergency; cancer; maternity care; medical assessment; orthopaedic services and outpatient services.

The UL Hospitals Group serves a population of some 400,000 people and comprises the following six clinical sites:- University Hospital Limerick, University Maternity Hospital, Croom Orthopaedic Hospital, Ennis Hospital, Nenagh Hospital and St John's Hospital.

The six clinical sites, working as a single hospital system, are supported by its 3,000-strong workforce.

The Recruitment Department is responsible for coordinating the recruitment of staff for UL Hospitals. This department comprises a team of four staff and reports to the Group Director of HR. It links with the HSE National Recruitment Service (NRS) generally for filling permanent posts but it also carries out regular recruitment campaigns locally to fill temporary vacancies.

In the course of her discussion with the CPSA Auditor, the HR Recruitment Manager raised some concerns about difficulties her Office encounters at local level. She expressed concerns generally about the lines of communication between central HR in the HSE and Managers at local level. She noted in particular difficulties local managers experienced in keeping up to date on HSE's policy and procedures governing areas such as job descriptions and eligibility criteria. She voiced her concern about the delays her team experienced in filling local vacancies from NRS panels, including the numerous levels of approval and sign off required for each job order and the difficulties this poses for managing appointments efficiently. She referred to the frustrations expressed to her by local Service Managers who she said are unhappy that it can take between 8 and 12 weeks to fill a post from an existing NRS panel - this timeframe can vary considerably depending on the particular post and whether a panel exists at the time of the request. The HR Manager also referred to feedback her team has received from candidates who say that they want to work in UHL but have to deal with the NRS. She advised that these candidates believe that the NRS is detached from and often unfamiliar with challenges and developments affecting the UL Hospitals.

A number of appointment processes managed by HR in UHL to fill temporary positions in 2015 were selected for examination for the purpose of this CPSA audit. These appointments included;

- Pharmacist
- Physiotherapist (Senior and Staff Grade)
- Clinical Nurse Manager 2 (Orthopaedics and Clinical Facilitator, Paediatrics)
- Clinical Midwife Manager 2
- Medical Laboratory Assistant.

In addition to these temporary appointments, the Audit Team looked at the recruitment process for appointing permanent nursing staff for UL Hospitals. This includes the recruitment of (i) Staff Nurses and (ii) Graduate/Pre-Registered Student Nurses.

Audit Findings - Permanent Staff Nurse

General Staff Nurse is an entry grade that covers both experienced staff nurses and graduate/pre-registered student nurses. These appointments are made by UHL on an ongoing basis to meet service needs in the UL Hospital Group.

The recruitment market for nursing position is highly competitive both nationally and internationally. Like other Hospital Groups, UHL must be proactive in its approach to attracting nurses to work in the area. It works closely with the University of Limerick to recruit graduate nurses and attends recruitment fairs to promote working in UL Hospitals.

The HR Manager advised that as a result of the constant need to fill Staff Nurse posts, the UL Hospital Group has introduced a series of rolling recruitment campaigns to meet its nursing needs.

(i) Staff Nurse Recruitment

Since January 2015, vacancies for Staff Nurses have been advertised on the HSE website on a continuing basis as it seeks to fill permanent and temporary posts in the HSE West - Clare, Limerick and Tipperary. The HR Manager advised that vacancies are also advertised intermittently in other media including radio and newspapers. The HSE website carries information on the Job Specification together with the application form. Candidates are invited to submit an application by email. UHL advised that, given the demand for nurses and the relatively short supply of qualified candidates, all applicants who meet the minimum eligibility criteria are invited for interview.

The HR Manager advised that competency based interviews are held as required and successful candidates are placed on a panel for appointment. According to the HR Manager, selection board members are selected on the basis of their relevant expertise and knowledge in the clinical area, as well as experience of interviewing. In general there are three interview board members on the selection board however the HR Manager remarked that there are a limited number of suitable board members available. HR provides a briefing to the board members before the interviews. Board members are also provided with 'General Guidelines for Conducting Structured Interviews' and this document has been provided to the Audit Team. The guidelines

cover all aspects of the interview process including preparation, the role of board members, interview format and approach, questioning the candidate and notetaking. The HR Manager advised that while there is no training currently provided there are plans to introduce a Training Programme in 2016 in association with Limerick University to provide interview training for board members.

The HR Manager also advised that some Staff Nurse vacancies are filled on the basis of specialist expertise and experience. For example the University of Limerick hosts a Higher Diploma course for Staff Nurses to upskill them in areas such as Emergency Department /Acute Medical Unit. UHL agrees to fill these posts with those who successfully complete the course. This provides a training and development opportunity for Staff Nurses while also meeting the service needs of the hospital.

(ii) Graduate/Pre-Registered Student Nurse Recruitment

The HR Manager explained the background to filling these posts each year, which is replicated nationally across the HSE. UHL is invited by the University of Limerick to address final year nursing students about job opportunities available within the Hospital Group. The staff nurse posts are then advertised in the University and are also notified to other Hospital Group Managers across the HSE so that students in other areas are aware of the recruitment opportunities within UL Hospitals. Following a merit based appointment process successful candidates are employed as pre-registered student nurses pending registration with the Irish Nursing Board.

Records for the 2015 Graduate/Pre-Registered Student Nurse recruitment campaign were examined during the audit. A job description for this role set out information relating to working relationships and the overall objectives including professional role and development, standards and research, administrative and risk management and Personnel. The essential requirements for the role state that candidates must "*Be eligible for presentation to the University of Limerick Exam Board and evidence of this must be available prior to employment to the employer*".

48 applications were received in 2015 and 40 candidates attended for interview. Candidates were assessed under pre-determined selection criteria – Professional Knowledge, Patient/Centeredness, Organisation & Management of Care and Communication/Interpersonal Skills. The interview board members based their assessment of candidates using a set of questions agreed in advance. All 40 candidates were placed on the panel for appointment. The successful candidates were offered fixed term contracts for permanent Staff Nurse posts and remunerated on the Pre-Registration Salary Scale. Following registration with the Irish Nursing Board they were converted to the Staff Nurse Salary Scale.

A similar recruitment campaign for Pre-registered Staff Midwife was conducted by UHL in 2015.

Audit Findings – Temporary Posts

The audit examined files and documentation associated with a selection of temporary appointments made by UHL during 2015. These included Pharmacist, Senior and Staff Grade Physiotherapist, Clinical Nurse Manager 2 (CNM 2) in Orthopaedics and Paediatrics, Clinical Midwife Manager 2 (CMM 2) and Medical Laboratory Assistant.

Advertising and Application

The records of these selection processes show that the positions were not circulated/advertised outside of the UL Hospital Group. Records show that only some of the positions (Physiotherapist Senior, Clinical Nurse Manager 2, Clinical Midwife Manager 2) were emailed internally and were confined to eligible staff employed at UL Hospitals.

The remaining positions (Pharmacist, Physiotherapist Staff Grade, Medical Laboratory Assistant) were filled on foot of (i) unsolicited CVs received within HR and held on file and (ii) Agency staff working in the post.

The HR Manager advised that these practices were employed because these are temporary posts and the HR Unit does not have the resources available to manage the volumes of candidates that an open recruitment campaign would entail. It was also explained that there are circumstances where a candidate pool must be limited due to budgetary restraints, i.e. the appointment can only occur within the current staff complement and cannot cause an additional cost to the service. The documentation showed that where candidates were assessed on the basis of the CVs submitted that, generally, completed application forms were not required.

Selection Process

The records confirmed that in all instances candidates were interviewed by a selection board, generally comprising three board members. In three of the competitions examined, candidates were assessed on the basis of their CVs while the remaining candidates had completed application forms for the post. In most cases there was a set of interview questions agreed by the board members in advance of the interviews. The selection boards assessed candidates against pre-determined competencies and awarded scores under each heading. There was evidence of good interview notes to support the selection process. In some cases candidates were advised in their results letter that the marking sheet would be sent to them.

Panels and Appointments

Following the interviews, candidates were placed on a panel in order of merit to be considered for appointment. In a number of the competitions some candidates were deemed unsuitable for appointment based on their interview and were not placed on the panel – in one competition records showed that of 20 candidates who were interviewed, 11 qualified and were placed on the panel for appointment.

Where candidates were offered an appointment they were advised that any such appointment was subject to certain conditions including suitable

reference checks, health assessments, Garda Clearance and verification of qualifications. The HR Manager confirmed that recruitment staff carry out the necessary checks to ensure candidates meet the eligibility criteria for the post and evidence of required qualifications is received. Candidates appointed to the post were given temporary specific purpose contracts for a fixed term depending on the circumstances of the post to be filled.

Requests for Review

It was confirmed by the HR Manager that very few requests for review are received from candidates for these temporary posts. Section 7 appeals are carried out by the Recruitment Manager and complaints under Section 8 of the Code are examined by a senior HR Manager outside of the service.

Grade III Clerical Recruitment

The HR Manager advised that no permanent recruitment of clerical staff had taken place since 2009. There are however regular vacancies arising at this grade that need to be filled without delay in order to ensure continuity of service to hospital patients.

The HR Manager explained that temporary Grade III positions are not advertised and are generally filled on the basis of unsolicited CVs held on file and from staff who have previously worked in the Hospital. CVs received by HR are held on file for a number of months for consideration in the event that a vacancy arises. She advised that in the past Hospital Management agreed to recruit clerical Grade III staff using the services of local Recruitment Agencies. She also advised that all candidates are interviewed by HR personnel to assess their suitability for a particular role. Successful candidates are employed on a fixed term contract for a specified period.

A Directive from National HR issued in 2014 advising all HSE Managers that it was necessary to curtail the high costs associated with the employment of agency staff. On foot of this directive it was agreed to convert a number of agency posts to HSE fixed term contracts including clerical/administrative staff. The HR Manager advised that the current practice in UHL is to recruit locally for temporary clerical staff so as to avoid excessive agency fees.

3.2 Overview of Local Appointments in University Hospital Waterford (UHW)

University Hospital Waterford (UHW) provides general medical, surgical and maternity care to people living in South Kilkenny, Waterford City and County.

There are approximately 2,000 wholetime equivalent staff in the hospital that are managed and supported by a small team of HR personnel. The team is headed up by a HR Manager who has responsibility for all recruitment and selection to meet the needs of the hospital services.

During 2015 the Office of the CPSA was informed that temporary Grade III positions (secretarial/clerical staff) in UHW were not being filled on foot of a

fair, transparent, competitive merit based appointment process. These appointments formed the basis of the audit in Waterford Hospital.

Informal Complaint

The Office of the CPSA received an informal complaint that agency staff were given temporary appointments to Grade III positions (secretarial/clerical) in UHW and these appointments were subsequently upgraded to 12 month HSE contracts.

Following enquiries relating to these appointments the Office of the CPSA was advised by the HSE that, on foot of a directive to reduce/eliminate agency costs as part of the HSE cost containment plans, it was agreed to convert a number of agency posts to fixed term contracts across a number of disciplines including clerical/administrative staff.

Acting on this directive HR Unit in UHW made enquires with the Public Appointments Service (PAS) about the possibility of sourcing staff however there were no panels currently in place to meet their needs. UHW advised the Commission that it was required to source suitably qualified secretarial/administrative staff and the agency staff already in place had acquired the necessary skills and competencies required to work in a hospital setting. The Commission was advised that this formed the basis of the decision to offer the agency staff in place fixed term contracts that varied in duration from 3 months to 1 year.

At the time UHW confirmed that management were in the process of completing the necessary documentation seeking approval to fill these posts on a permanent basis, given that the conversion process was to fill posts on a short-term fixed purpose basis pending permanent approval. Once approved these posts would be forwarded to the NRS for filling on a permanent basis.

UHW also advised that it had a temporary Grade III Clerical Officer panel in place to fill any further short-term temporary vacancies.

Audit Findings

At a meeting with the UHW's HR Manager, it was confirmed that, in accordance with the HSE guidelines, all permanent posts are filled by the NRS while Non-Consultant Hospital Doctors (NCHDs) are recruited locally. The HR Manager advised that there had been no clerical recruitment for permanent posts within the HSE since 2009. This along with budgetary constraints within the Hospital had contributed to difficulties for the Hospital in the last number of years in filling vacancies at Grade III level (entry level for clerical staff). UHW considered that its growing number of vacant posts was not sustainable even in the short term and the potential risks to service delivery and to patient safety needed to be addressed.

Over a period of time, and as the Hospital budget allowed, the Management Team in UHW agreed to engage some temporary staff to fill Grade III posts until such time as the posts could be approved and filled on a permanent basis by the NRS. The HR Manager advised that it was decided to use

agency staff because HR did not have the capacity to conduct a competitive recruitment process for temporary positions which was likely to attract a high volume of applicants. The HR Manager confirmed that the UHW did not have a contract with the Recruitment/Employment Agencies it used and that the agencies were selected on the basis that they had offices locally in Waterford. It was also confirmed that, generally, the agency provided the UHW with names of suitable candidates from their files based on the job criteria provided. UHW received CVs from which candidates were selected to attend for interview.

The HR Manager advised that there are currently two administrative agency staff working in UHW.

Records show that over the past three years UHW had recruited almost 40 agency staff at Grade III level on fixed-term contracts of varying durations, some of which were extended up to 2 years. The HR Manager referred to a Directive that issued from National HR in 2014 stating that in an effort to curtail the high costs associated with agency staff, it was agreed that agency posts, including clerical/administrative staff, would be offered fixed term HSE contracts. On foot of this Directive the Hospital Management Team made a decision to convert the Grade III agency staff to HSE employment contracts during the early months of 2015. The HR Manager confirmed that the appointment of these contract staff is a temporary arrangement until such time as the posts can be filled on a permanent basis by the NRS.

The records confirm the conversion of clerical agency staff to HSE contracts was requested and approved in accordance with the agreed HSE procedures. Each HSE employee signed a Fixed Term (Specified Purpose) Temporary Contract for Grade III which stated, inter alia, the purpose and termination date of the contract.

In addition to the converted agency staff UHW also directly recruited a small number of temporary Grade III staff in 2015. The HR Manager advised that due to limited staff resources in HR they were not in a position to advertise for the small number of temporary vacancies to be filled. Therefore candidates invited to attend for interview were selected from individual's CVs received by the Hospital that are held on file and staff with previous clerical work experience in the Hospital.

Records relating to the competition for temporary Grade III in May 2015 were examined. Five candidates were invited to interview. The interview board comprised two people from HR and the Administration/Health Records Manager. The board members assessed candidates against five skills/competencies identified for the role;

- Knowledge/Professional Knowledge
- Commitment to providing a quality service
- Managing & Developing (Self & Others)
- Evaluating Information & Judging Situations
- Communication/Interpersonal Skills

Candidates received scores under each of the headings ranging from a maximum of 50 marks to a minimum of 20 marks required for each criteria to qualify. Four candidates attended for interview and all were deemed suitable. A panel was formed in order of merit from which candidates would be selected to fill any vacancies arising.

Another competition held for temporary Grade III held in June 2015 was also examined. The same process was followed for this competition. There were three board members, two from HR and a Grade V, who interviewed three candidates. All three candidates were deemed suitable and placed on a panel for appointment.

Candidates from the panels who were offered positions received a letter informing them that appointment to a temporary position was subject to submission of satisfactory references and certain documentation including, where appropriate, birth certificate, work visa, educational qualifications, two referees, a signed statutory declaration and garda vetting/clearance. All candidates appointed signed a fixed term (specified purpose) temporary contract that set out the exact purpose and termination date of the employment that varied from three months to one year.

Chapter 4 – Audit Conclusions

The Commission wishes to acknowledge the work of staff working at local level within the HSE in managing recruitment and selection within the Hospital Groups so that they can support the provision of a quality healthcare service. It recognises that devolving recruitment to local HR can be helpful in supporting a flexible and responsive system of appointments. While the Commission noted that there were a number of processes and procedures in place that supported the appointment of candidates on merit, it has concerns about the level of the safeguards deployed in appointing candidates to positions in the HSE and considers that the Licence Holder needs to take steps to address the shortcomings identified.

The Commission has a number of recommendations which, when implemented, will support the HSE in its efforts to properly meet the provisions of its Recruitment Licence.

Advice and Recommendations

- (i) The Commission recommends that the HSE reviews and strengthens its governance arrangements so that it is better placed to monitor and control the standards applied in the recruitment, selection and employment of staff in each hospital Group.

The Commission noted that Local Management may carry out its own recruitment subject to (i) approval from the NRS and (ii) certain reporting requirements in relation to the numbers and grades of staff recruited locally.

However it noted that there was no little or no central monitoring or controlling of the standards applied in areas such as the manner in which posts are advertised, how selection board members are chosen, trained and briefed, the application of centrally approved job and person specifications including the eligibility criteria for positions and the provision of feedback to candidates.

Worryingly, the Commission noted that there appears to be limited appreciation at local level of the HSE's statutory obligation to adhere to the CPSA's Code of Practice and the terms and conditions of its Recruitment Licence.

- (ii) Allied to the recommendation above, and in the interest of ensuring the fair and equitable treatment of candidates in the recruitment process the Commission recommends that the HSE ensures the following safeguards are applied on a consistent basis for appointments across the organisation:-

- All appointment processes are supported by clear, concise and effective marketing designed to target an appropriate applicant field
- Centrally approved job specifications/role profiles and pre-determined job related selection criteria are used to assess candidates for all posts
- Set protocols are followed in choosing, training and briefing selection board members
- Specific and meaningful feedback is available to candidates on request
- Robust candidate vetting to ensure that only eligible candidates are selected
- Information on the CPSA's Code of Practice and its review and complaint procedures are available to all candidates

The Commission considers that the HSE's National HR will need to assume a greater responsibility for the oversight of local recruitment to ensure that the terms of the HSE's recruitment licence are not compromised.

- (iii) The Commission recommends that the HSE considers the comments made by UHL's local HR about delays it experiences in making appointments from the NRS's panels to determine whether there is scope to improve the level of service provided.
- (iv) Notwithstanding the knowledge, experience and commitment of many HR staff at local level, the Commission recommends that those involved in recruitment at local level receive training as a priority covering all aspects of the appointment process including an overview of the common errors in the assessment and evaluation of candidates, best practice recruitment and selection, and advice on the implementation of the relevant Guidance Notes and Guidelines that are available from the NRS. All recruitment staff must be reminded that all appointments, both temporary and permanent, must be made on foot of a transparent, fair, competitive merit-based appointment process in accordance with the Commission's Codes of Practice.

In addition to the provision of training to those involved in recruitment and selection the Commission recommends that communication with all Hospital Groups within the HSE is reviewed to ensure relevant and up-to-date information on national policy and procedures is shared with the relevant personnel in a timely manner.

- (v) The Commission notes that the HSE is operating in a highly competitive environment in terms of international nursing recruitment. It notes that the HSE offers under-graduate training opportunities to student nurses from Irish Colleges, internships to pre-registered graduate nurses as well as employment opportunities to recently qualified nurses. The Commission wishes to encourage the HSE to take the steps necessary to ensure that those qualified and interested

in pursuing a career in nursing in Ireland can find out from HSE.ie and other appropriate sources about the range of options available to them for employment opportunities in the Irish Health Service.

- (vi) The Commission is very concerned about some of the practices observed in the course of the audit and, pursuant to Section 49 of the Public Service Management Act, wishes to advise the HSE that it acts immediately to end the practice of confining competitions to those who have submitted unsolicited CVs. It considers that very few potential candidates will know that this practice is being employed by the HSE let alone know how they might express an interest in one of these positions.

The Commission believes that this practice not only undermines selection on merit, it leaves the HSE open to charges of nepotism. Notwithstanding the concerns of local HR Managers that advertising temporary vacancies may generate considerable work in terms of managing recruitment processes, the Commission wishes to remind the HSE that it is obliged to deploy effective marketing efforts to ensure that its recruitment is from the widest pool of available talent.

- (vii) Pursuant to Section 49 of the Public Service Management Act, the Commission wishes to advise the HSE that it must act immediately to review how Employment and Recruitment Agencies operate in making appointments to positions in the HSE. The Commission did not see evidence that the Agencies used by UHW and UHL made efforts to advertise the positions to be filled within the HSE. It appears that the Agencies involved did little more than forward CVs they had received for consideration by local HR. In this regard, the employment of the Agency staff is no different to the employment of staff on foot of receipt of unsolicited CVs. While procurement practices are not a matter for the Commission, it believes that the HSE may wish to examine the practice of engaging Recruitment Agencies by local HR Units.

As it has identified shortcomings in the management of appointment processes in two HSE Hospital Groups that were the subject of this audit, the Commission is also concerned that there may be similar weaknesses in practices and procedures deployed in other HSE Hospital Groups. This view is supported by formal complaints and informal enquiries received by the Commission relating to local recruitment in other locations across the HSE.