

JOB DESCRIPTION	
Job title:	Compliance Lead (Off Payroll Working)
Team/Department:	People and Culture
Location:	Regional/Ashford/ Hybrid
Hours of work:	As agreed, and in accordance with the contract of employment
Job title the post holder will report to:	People Partner
Job titles reporting to the post holder:	None applicable
Date the role profile was revised:	March 2024

JOB PURPOSE

To ensure the off payroll working rules are monitored and applied correctly to all clinical and non-clinical contractors that work for IC24. To ensure that every contractor is correctly categorised, that their workers status is accurate and correctly assessed, that the business is following the correct processes in relation to working with contractors and that IC24 are engaging with them all in a way that is legal and compliant.

KEY RESPONSIBILITIES AND ACCOUNTABILITIES

- Develop and implement robust compliance strategies tailored specifically for off payroll working within the United Kingdom, ensuring alignment with HMRC laws and other relevant regulations.
- Monitoring changes in the relevant off pay roll working rules and updating guidance and training materials.
- To conduct regular audits and assessments of clinical and non-clinical contractors to identify those that provide services via their own limited company via another intermediary, or directly to identify any organisational compliance risks and implement measures to mitigate these risks.
- Ensure that engagement of the contractor reflects the working practices that they will undertake and take action to resolve where this may have changed.
- To gather and hold evidence of compliance.
- To undertake regular checks via the HMRC Government Portal (CEST) to get updates of status determinations of contractors we engage in to ensure that status is accurate and correct.
- To undertake regular audits of contractors who are deemed as inside of IR35 to ensure that PAYE is being correctly deducted by their respective agencies.
- Ensure our SOPS / Policies and Service Levels Agreements we have in place are kept up to date.

- To contribute towards the development of the Contractor Policy.
- Provide a comprehensive training program to educate Managers about off payroll working and obligations and best practices.
- Act as the primary point of contact for compliance-related enquiries, audits, and relationships with regulatory bodies and external partners.
- Prepare and present compliance reports to senior management and the board of directors, highlighting risks to the business, key compliance metrics and new initiatives.
- Ensure that electronic contractor personal folders are set up correctly for review as required e.g. review status determinations, audit process, policies and Service Level Agreements.
- Continually review and keep abreast with the changing landscape of off payroll working.
- Where appropriate seek professional advice on any contractors that require further investigation.
- Work with internal colleagues including system development to ensure a efficient internal process including interface with Quinyx system.

COMMUNICATION AND KEY WORKING RELATIONSHIPS

The post holder must be able to demonstrate excellent communication and interpersonal skills at all times and build and maintain good working relationships with all stakeholders.

ENVIRONMENT

IC24 is a major not for profit Social Enterprise company currently providing innovative primary care services designed to deliver quality and affordability. IC24 is solutions-focused, providing a comprehensive portfolio of services aimed at improving access and reducing the demand on secondary care services by helping to avoid unnecessary admissions and facilitating early discharge.

Going forward, the company is committed to supporting and enabling better integration between health and social care and more effective alliances between partners from different sectors as essential to delivering seamless services. IC24 has considerable experience of working in complex, demographically challenged environments and the Board is keen for the organisation to be proactive in improving standards of care and patient safety, while delivering value for money too in the health economies it which it operates. Critical to this is building strong professional relationships and alliances with third parties; working with them in a way that maximises the benefits of their involvement.

We are proud of our status as an NHS primary care social enterprise, and how we deliver social value to the communities we serve and contribute to the wider NHS plans to deliver

carbon 'Net Zero' and sustainability. To find out more on this and to view our Social Impact Report, please click [here](#).

HEALTH AND SAFETY

The post holder will be required to comply with the duties placed on employees of IC24 as set out in the Health and Safety at Work Policy and related procedures. The post holder has a legal obligation to make positive efforts to maintain their own personal safety and that of others by taking reasonable care, carrying out requirements of the law and following recognised codes of practice.

All Colleagues

You have a duty to take care of your own health and safety and that of others who may be affected by your actions at work. You must cooperate with managers and other colleagues to help everyone meet their legal requirements under health and safety law, and not to interfere with or misuse anything that's been provided for your health, safety, or welfare.

Managers

You must ensure you know and understand your responsibilities as defined in our health & safety policies and associated guidance documents. You must identify and assess any risks to people, property, or the environment and ensure all colleagues you have responsibility for, are aware of all our health and safety policies, understand issues arising from risk assessments, site inspections etc. and deal with any associated concerns. You must ensure that all accidents or incidents involving colleagues within your responsibility, are properly reported, and investigated and that regular inspections are undertaken and recorded to eliminate potential hazards and minimise risks.

Directors

You must ensure that all colleagues and teams within your region and/or department(s), effectively manage health and safety in line with all our health & safety policies and guidance documents.

EQUALITY AND DIVERSITY

IC24 has a Diversity and Inclusion Policy to ensure that no job applicant or employee is discriminated against either directly or indirectly on the grounds of disability, marital status, sex, race, colour, nationality, ethnic or national origin, sexual orientation, age, religion or political opinion, whilst attracting talented recruits and retaining experienced employees.

IC24 is committed to promoting equal opportunities and diversity and will keep under review its policies, procedures and practices to ensure that, in addition, all users of its services are treated according to their needs.

INFORMATION GOVERNANCE

Information is vitally important for the safe clinical management of patient care and the efficient administration of services and resources, including our workforce. Information Governance is a framework to enable IC24 to handle personal and corporate information appropriately.

It is the responsibility of our entire workforce, regardless of employment status, to ensure they abide by the requirements of Information Governance as set out in the Data Security & Protection Policy.

SAFEGUARDING CHILDREN AND VULNERABLE ADULTS

IC24 is committed to safeguarding and promoting the welfare of children, young people and vulnerable adults. All colleagues and volunteers are therefore expected to behave in such a way that supports this commitment. You will be responsible for safeguarding the interests of children and adults who you come into contact during your work. To fulfil these duties, you will be required to attend training and development to recognise the signs and symptoms of abuse or individuals at risk, to follow local and national policy relating to safeguarding practice and to report and act on concerns you may have appropriately.

DISCLOSURE AND BARRING SERVICE CHECKS

IC24 will require a DBS check for appropriate roles which is a mandatory requirement and a condition of the employment offer.

All posts are assessed on their eligibility for the post holder to be required to undertake a DBS check. For posts that have been assessed as exempt from the provisions of the Rehabilitation of Offenders Act 1974, IC24 will require the post holder to undertake an enhanced DBS check with barred list checks. For posts that have been assessed as being in a position of trust, IC24 will require the post holder to undertake a basic DBS check.

This post has been assessed as requiring a basic DBS check.

REHABILITATION OF OFFENDERS ACT 1974

Some posts have been assessed as being exempt from the provisions of the Rehabilitation of Offenders Act 1974 and in these cases IC24 will require the post holder to disclose all convictions, whether spent or unspent.

This post has been assessed as not being exempt from the provisions of the Rehabilitation of Offenders Act 1974; therefore, the post holder is not required to disclose any spent convictions.

PERFORMANCE AND DEVELOPMENT REVIEW

This job description will be used as a basis for conducting an individual Performance and Development Review between the post holder and the manager.

VARIATIONS

This job description describes the main purpose and key responsibilities and accountabilities of the post. The post holder may be required to undertake any additional duties or responsibilities as may reasonably be required.

This job description is a guide to the nature and main duties of the post as they currently exist, but it is not intended as a wholly comprehensive or permanent schedule and it is not part of the contract of employment.

To reflect changing needs and priorities, some elements of this post may be subject to change and where required, any appropriate communication or consultation with the post holder will be undertaken prior to making any changes.

PERSON SPECIFICATION

Requirements	Essential	Desirable	How identified
Qualifications and training	Degree or equivalent		Application/ Certificates/ Interview
Experience	<p>Key knowledge and understanding of off payroll regulation</p> <p>Strong problem-solving skills</p> <p>Ability to work with detailed and sometimes complex information</p> <p>Working knowledge of Quinyx is essential</p>	<p>Some auditing exposure</p> <p>Experience of managing off payroll working processes</p> <p>Experience of training managers</p> <p>Experience of managing documentation evidence</p>	Application/ Interview
Practical skills	<p>Understands tax legislation (off payroll working)</p> <p>Ability to deliver training to management staff</p> <p>Ability to persuade and influence management</p>	Has been involved in HMRC off payroll working audit	Application/ Interview
General	<p>Good communication at all levels</p> <p>Organised and good attention to detail</p>	Calm under pressure with good time management skills	Application/ Interview