



# Safer Recruitment Policy

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## **Statement of Intent**

**Community Inclusive Trust** has implemented this policy to assist with recruitment and employee selection. It outlines the Trust's recruitment procedure and how the Trust ensures safer recruitment is considered at all levels of the recruitment process.

The safety and protection of the Trust's pupils is always at the forefront of the Trust's concerns, which is why this policy aims to embed a robust safeguarding culture into the recruitment practices of the Trust.

## **1. Legal framework**

1.1 This policy has due regard to all relevant legislation including, but not limited to, the following:

- Children Act 1989
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- The Education (Trust Teachers' Appraisal) (England) Regulations 2012 (as amended)
- Sexual Offences Act 2003
- The Trust Staffing (England) Regulations 2009
- Rehabilitation of Offenders Act 1974
- Education and Skills Act 2008
- Data Protection Act 2018
- The General Data Protection Regulation (GDPR)
- Education Act 2002
- Equality Act 2010

1.2 This policy has due regard to guidance including, but not limited to, the following:

- DfE 'Keeping children safe in education'
- DfE 'Staffing and employment advice for Trusts'
- DfE 'Governance handbook'
- DfE 'Guidance for full opening: Trusts'
- DfE 'Changes to checks for EU sanctions on EEA teachers from 1 January 2021'

1.3 This policy operates in conjunction with the following Trust policies:

- Child Protection and Safeguarding Policy (individual schools)
- Records Management Policy
- Data Protection Policy
- Acceptable Use of the Internet & IT Systems Policy

## **2. Definitions**

2.1 **Regulated activity** – includes:

- Teaching, training, instructing, caring for or supervising children if the person is unsupervised, or providing advice or guidance on physical, emotional or educational wellbeing, or driving a vehicle only for children.
- Working for a limited range of establishments (known as 'specified places', which include schools), with the opportunity for contact with children, but not including work undertaken by supervised volunteers.
- The above definitions are classified as regulated activity if they are undertaken regularly. Some activities are always regulated activities, regardless of frequency or whether they are supervised or not. This includes relevant personal care, or health care provided by, or under the supervision of, a health care professional. Personal care includes helping a child with eating or drinking, for reasons of illness or disability, or in connection with toileting, washing, bathing and dressing for reasons of age, illness or disability. Health care means care for children

provided by, or under the direction or supervision of, a regulated health care professional.

- A supervised volunteer who regularly teaches or looks after children is not in regulated activity.

2.2 **Teaching role** – refers to a role involving planning and preparing lessons and courses for pupils; delivering lessons to pupils; and assessing and reporting on the development, progress and attainment of pupils. These activities are not teaching work for the purposes of ‘Keeping children safe in education’ (KCSIE) if the person carrying out the activity does so (other than for the purposes of induction) subject to the direction and supervision of a qualified teacher or other person nominated by the headteacher to provide such direction and supervision.

2.3 Standard DBS – this provides information about convictions, cautions, reprimands and warnings held on the Police National Computer, regardless of whether or not they are spent under the Rehabilitation of Offenders Act 1974.

2.4 Enhanced DBS – this provides the same information as the standard DBS, plus any additional information held by the police which a chief officer reasonably believes to be relevant and considers ought to be disclosed.

2.5 Enhanced DBS with barred list check – this check is required for when people are working or seeking to work in regulated activity with children and/or vulnerable adults. This check allows for additional checks to be made as to whether the person appears on the children’s or adults’ barred lists.

2.6 Children’s barred list – the DBS maintains a ‘barred list’ of individuals who are unsuitable to work with children. In addition, where an enhanced DBS including a barred list check is obtained, the certificate will also detail whether the applicant is subject to a direction under section 128 of the Education and Skills Act 2008 or section 167A of the Education Act 2002.

2.7 Adults’ barred list – the DBS also maintains a ‘barred list’ of individuals who are unsuitable to work with vulnerable adults. This check should only be applied for if the person will be in regulated activity with vulnerable adults.

2.8 Section 128 check – this provides for the Secretary of State to direct that a person may be prohibited or restricted from participating in the management of a school or Multi Academy Trust (including academies and free schools).

2.9 Safer recruitment – this is the safeguarding and protection of pupils during the recruitment and selection process. Its overall purpose is to help identify and deter or reject individuals who are deemed to be at risk of abusing children.

### **3. Roles and responsibilities**

3.1 The HR Director is responsible for:

- Agreeing and monitoring effective policies to ensure recruitment at the Trust is in accordance with the legislation outlined in section 1.
- Ensuring that staff recruitment is as safe as possible, as well as fair and compliant with the relevant legislation.
- Ensuring appropriate checks have been carried out on staff, volunteers, contractors and agency workers working within the Trust.

- Monitoring the advertising of vacancies, assessing how they are being advertised and whether the adverts are maximising all of the opportunities to attract the appropriate candidates.
- Benchmarking the success of any advertising methods used, as well as the overall success of the recruitment process.
- Ensuring a member of the local school board is on the recruitment panel for a new headteacher.
- Ensuring that equal opportunities are established and implemented throughout the recruitment process.
- Accommodating the needs of new employees and making reasonable adjustments when necessary.
- Ensuring that any recruitment data that is kept is in accordance with the Records Management Policy.

3.2 The recruitment manager is responsible for:

- Creating the advert and ensuring it meets all the necessary requirements.
- Shortlisting the potential candidates with the aim of reducing the application field and identifying those with the potential to effectively undertake the role.
- Establishing appropriate recruitment procedures.
- Ensuring that the salary of the successful candidate is determined.
- Ensuring that at least one member of the recruitment panel has undergone safer recruitment training.
- Ensuring that all members of the recruitment panel understand their role, i.e. advisory or decision making.
- Ensuring that the interview addresses ability, team working skills, reasons for interest in joining the Trust, integrity, understanding of the Trust's ethos and vision, and why the candidate believes they would be a good fit for the Trust.
- Ensuring that the interview addresses safeguarding practices.

3.3 The Director of Safeguarding and Wellbeing is responsible for:

- Ensuring that all members of the recruitment panel are familiar with their obligations with regards to safer recruitment, as set out in KCSIE.
- Monitoring the Trust's SCR to ensure that the necessary vetting checks for employees are carried out.

3.4 During the recruitment process, and especially during the initial stages, the recruitment manager and recruitment panel will be watchful of candidates displaying the following characteristics:

- No understanding or appreciation of children's needs
- Expressing that they want the role to meet their needs at the expense of children
- Using inappropriate language in relation to children
- Expressing extreme views or views that do not support safeguarding practices
- Displaying unclear boundaries with children
- Providing vague answers when asked about their experience and being unable to explain gaps in their employment

**4. Equal opportunities**

4.1 The Trust will not discriminate against any protected characteristics, such as disability or gender, and will always promote difference and inclusion throughout the Trust.

- 4.2 The Trust will, where necessary, make reasonable adjustments to ensure the interview is accessible to all candidates. Candidates should inform the Trust of any reasonable adjustments that they need when they receive the invitation for an interview.
- 4.3 The HR Director will review recruitment procedures annually to ensure they are accessible and do not directly or indirectly discriminate against candidates.
- 4.4 Candidates will not be asked about their health or any disabilities before a job offer is made, unless one of the following exemptions applies:
- Questions necessary to establish if an applicant can perform an intrinsic part of the job (subject to any reasonable adjustments)
  - Questions to establish if an applicant is fit to attend an assessment or any reasonable adjustments that may be needed at interview or assessment
  - Positive action to recruit people with disabilities
  - Equal opportunities monitoring (which will not form part of the decision-making process)

## **5. Planning, advertising and shortlisting**

- 5.1 Once a vacancy has been identified, the Trust will allow an appropriate amount of time for planning and structuring the recruitment process. A suitable recruitment manager will be assigned and will oversee the recruitment process.
- 5.2 The recruitment manager will:
- Decide on the recruitment timeframe.
  - Decide who will be involved in the process and what their roles will be, e.g. who forms the recruitment panel and who will lead interviewing.
  - Prepare the documents that will be provided to applicants, including the job description, person specification and application form – ensuring that these documents contain a clear message about safeguarding, the checks that will be carried out and that references will be sought.
- 5.3 The job information and associated documents will be published online.
- 5.4 The full requirements of the role will be clearly explained, including any employment vetting requirements such as a DBS check.
- 5.5 The recruitment panel will comprise a recruitment manager, who is responsible for the management of the entire recruitment process, and normally two other members of staff.
- 5.6 The recruitment panel must have a minimum of 2 members.
- 5.7 At least one member of the recruitment panel will have successfully completed up-to-date safer recruitment training.
- 5.8 The recruitment manager will ensure the advertisement includes the following requirements:
- Information specific to the role on offer and the school/Trust as a whole
  - The benefits of the role are highlighted
  - The advertisement is relevant to the target audience
  - The advertisement is communicated directly and concisely, and includes clear

information on how to apply

- Applications will be submitted electronically except in exceptional circumstances

- 5.9 Requests for further information from applicants will be replied to promptly.
- 5.10 Vacancies will normally be advertised through external sources.
- 5.11 Advertisements will include a job description, person specification and detail the closing date.
- 5.12 The details of the application process will be clearly outlined.
- 5.13 Application forms will be accessible on the school's/Trust's website.
- 5.14 The Trust may utilise social media for recruitment.
- 5.15 The Trust will never accept a CV alone, only completed application forms.
- 5.16 Shortlisted candidates will be invited to interview, either in writing or by phone.
- 5.17 If applicants have not had a response within 2 weeks of the closing date, they should assume they have been unsuccessful.
- 5.18 The Trust will not write to all unsuccessful applicants.
- 5.19 When shortlisting candidates for an interview, all completed application forms will be considered.
- 5.20 At least two members of staff will be involved in the shortlisting process.
- 5.21 Candidates who are shortlisted will normally meet all the essential aspects of the person specification requirements.
- 5.22 The Trust will ensure that the shortlisting process is as systematic as possible, and that the recruitment panel reads through all applications. Each member of the panel will create their own shortlist which will then be collated and discussed.
- 5.23 Applicants will be assessed against the same shortlisting criteria to ensure a fair process.

## **6. Invitation to interview**

- 6.1 Once a shortlist has been confirmed, the applicants will be invited for interviews.
- 6.2 The invite will include information about the interview arrangements, how they will be conducted, the areas that will be explored and what documents they should bring.
- 6.3 The invite will include information regarding necessary identity checks for the successful candidate.
- 6.4 The recruitment manager may obtain two references before interviewing candidates to allow for any concerns to be explored with the referee and discussed with the candidate.
- 6.5 One of the references will be from the candidate's most recent employer, where possible.

- 6.6 Where a candidate is not currently employed, verification of their most recent period of employment and reasons for leaving will be obtained from the employer.
- 6.7 If a candidate's current or most recent employment has not involved working with children or vulnerable adults but they have in a previous role then a reference will be sought from this employer.
- 6.8 References will normally be from a senior member of staff and not a colleague.
- 6.9 Open testimonials will not be relied upon, nor will information that has been provided by the candidate without verifying the information.
- 6.10 Permission will be sought from candidates before contacting referees.
- 6.11 Information about past disciplinary action or allegations that are disclosed will be considered carefully when assessing the applicant's suitability for the post.
- 6.12 The candidate's current employer will be asked for details of any capability history in the previous two years, including the reasoning.

## **7. The interview**

- 7.1 During the interview process, candidates will be asked standard questions and their responses will be recorded for ease of comparison.
- 7.2 Any gaps in a candidate's employment history will be explored at interview.
- 7.3 Any concerns raised through contact with referees will be discussed with the candidate at this stage.
- 7.4 The recruitment panel will ask open questions to assess the candidate's experience and suitability for the post, and to explore the candidate's motivation towards safeguarding and their suitability to work with children.
- 7.5 The candidate will be given the opportunity to discuss any concerns or ask any questions.
- 7.6 The candidate should provide the relevant documentation and identification at the interview stage to support a DBS application and Right to Work checks. Original copies of any required qualifications should also be provided.
- 7.7 The interview will always comprise a face-to-face interview; however, the recruitment panel may also request that candidates complete one of the following exercises (this list is not exhaustive):
  - In-tray exercise
  - Skills assessment
  - Lesson observations

## **8. After the interview**

- 8.1 After the interview has been completed, the recruitment panel will:
  - Assess all candidates' performance using the same agreed criteria.

- Contact and provide feedback to the unsuccessful candidates – feedback will be verbal where possible, and based on evidence of their performance against the person specification for the role.

8.2 Interview notes and assessment materials will be held securely for an appropriate amount of time after the interviews, in line with the Records Management Policy, in case any aspect of the recruitment process is challenged.

8.3 After choosing a successful candidate, the recruitment manager will inform CIT HR who will:

- Make a conditional offer of employment to the candidate.
- Ask the successful candidate to provide identification and proof of qualifications, if this has not already been done.
- Complete the relevant pre-appointment checks.

## **9. Remote recruitment**

9.1 The Trust will follow all the requirements set out in this policy when recruiting remotely, changing only the in-person nature of the interview, and implementing the necessary additional steps to support this.

9.2 The recruitment manager will research and select a suitable online platform through which online interviews may take place, taking into account ease of use, privacy measures and suitability for the purposes of online interviews.

9.3 Online interviews will be conducted in line with the Trust's Acceptable Use of the Internet & IT Systems Policy and the Data Protection Policy at all times.

9.4 Staff members conducting an online interview will ensure they understand how to operate the various relevant functionalities of the online interview platform, e.g. how to share their screen, prior to the interview commencing.

9.5 Staff members conducting an online interview will ensure privacy settings are adjusted appropriately on the provider's site or application.

9.6 The Trust will be aware of, and have due regard for, the potential risks associated with online communication, e.g. ease of anonymity, and will ensure it takes suitable precautions, e.g. encrypting data where possible.

9.7 The Trust will ensure that any tasks set for candidates during the interview are compatible with the online nature of the interview, e.g. they do not require the exchange of physical paper resources.

9.8 The Trust will communicate its expectations to candidates regarding the use of the online platform in good time prior to the interview. These expectations will include, but will not be limited to, the following:

- The candidate will participate in the interview with both the video camera and microphone features enabled at all required times
- The candidate will participate in the interview in a suitable setting – a quiet area with a neutral background
- The candidate will keep personal information which is not relevant to the recruitment process private, e.g. their email password, and will not ask the staff members conducting the interview to share any such private information

- Where necessary, the candidate will be aware that the Trust will record the online interview, and that they will be required to consent to this in order for the interview process to continue

9.9 When recording an online interview, prior permission will be acquired from the candidate in writing via email and all members of the interview will be notified before the interview commences via email, and again once they have joined the interview before recording commences.

9.10 If the candidate does not provide consent to recording the interview, the Trust will consider whether the online interview can still take place in line with the Trust's safeguarding and records management responsibilities.

9.11 The Trust will not discriminate against candidates who are recruited remotely; they will be considered fairly alongside any candidates who are not recruited remotely.

9.12 If a candidate refuses to interview remotely, the Trust will consider whether alternative arrangements for an in-person interview are possible, having due regard to the Trust's equality duties at all times. If this is not possible, then the Trust will sensitively inform the candidate that the remote interview process is a requirement of the application process, and have a considerate and good-natured discussion with the candidate as to whether they can continue with the recruitment process at this time.

9.13 The Trust will direct candidates towards the DfE's advice on 'Attending your first remote interview' prior to the interview.

## **10. Pre-appointment checks**

10.1 All appointments will be conditional on satisfactory completion of the necessary pre-appointment checks.

10.2 When appointing new staff, the Trust will complete the following checks:

- Verify the candidate's identity
- Obtain an enhanced DBS certificate (via the applicant) and, for candidates engaging in regulated activity, barred list information
- Obtain a separate barred list check if an individual will start work in regulated activity before the DBS certificate is available
- Verify a candidate's mental and physical fitness to carry out their role
- Verify the person's right to work in the UK
- Make further checks on any individual who has lived or worked outside the UK
- Verify professional qualifications, as appropriate
- For those in management, trustee or governor roles, a section 128 check will be carried out
- A prohibition order or any sanction or restriction imposed (that remains current) by the GTCE before its abolition in March 2012.

10.3 If the Trust has reason to believe that an individual is barred, it is an offence under section 9 of the Safeguarding Vulnerable Groups Act (SVGA) 2006 for the Trust to allow the individual to carry out any form of regulated activity.

10.4 Checks for all prohibitions, directions, sanctions and restrictions will be carried out by using the secure access portal on the Teacher Services' web page.

10.5 There is no requirement to obtain an enhanced DBS certificate or carry out checks for

events that may have occurred outside the UK if, in the three months prior to their appointment, the applicant has worked:

- In a Trust in England in a post which brought them into regular contact with children or young persons; or
- In any post in a Trust since 12 May 2006 which did not bring the person into regular contact with children or young persons

### **Volunteers**

- 10.6 For volunteers, if they are not engaging in regulated activity, an enhanced DBS check will be obtained – a barred list check will not be required.
- 10.7 If volunteers are engaging in regulated activity and are new to the Trust, an enhanced DBS check with a barred list check will be required.
- 10.8 Existing volunteers in regulated activity do not need to be re-checked if they have already had a DBS check (including barred list information); however, the Trust may decide to conduct a repeat DBS check.

### **Candidates who have lived outside the UK**

- 10.9 For candidates who have lived outside the UK, all mandatory checks outlined in this policy will be carried out, along with additional checks where necessary.
- 10.10 From 1 January 2021, candidates who have lived or worked outside the UK, the Trust will make further checks where necessary, including, but not limited to:
- Obtaining an enhanced DBS certificate with barred list information, including for candidates who have not been to the UK before.
  - For teaching staff, obtaining proof of their past conduct as a teacher from the professional regulating authority in the country in which they worked, where available.

### **Agency and third-party staff**

- 10.11 In the case of any employee working at the Trust who is sourced from an agency or third-party organisation, confirmation must be obtained from the organisation, in writing, that all necessary checks have been completed.
- 10.12 Confirmation will also be obtained that the individual who presents for work is the same person on whom all checks have been completed. A copy of photographic identification will generally be kept where appropriate.

### **Trainee/student teachers**

- 10.13 The Trust will ensure that enhanced DBS certificates and barred list checks are obtained on all salaried applicants for initial teacher training who are in regulated activity.
- 10.14 Where trainee teachers are fee-funded, it is the responsibility of the initial teacher training provider to carry out the necessary checks.
- 10.15 The Trust will obtain written confirmation from the agency that the checks have been carried out.

### **Existing staff**

- 10.16 If a member of staff moves from a post that was not regulated activity to one that is, the relevant checks will be carried out.
- 10.17 The CIT HR Department will carry out further checks where there is a concern about a member of staff's suitability to work with children.
- 10.18 An investigation will be carried out to gather enough evidence to establish if an allegation has a foundation. The employer of the Trust will ensure they have sufficient information to meet the referral duty criteria in 12.23 of this policy.
- 10.19 The Trust will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:
- The harm test is satisfied in respect of that harm.
  - The individual has received a caution or conviction for a relevant offence, or if there is reason to believe that the individual has committed a listed relevant offence.
  - The individual is deployed to another area of work not in regulated activity, or where they have been suspended.
- 10.20 Referrals to the DBS will be made on conclusion of an investigation where an individual has been removed from regulated activity.
- 10.21 Referrals to the DBS will be made as soon as possible after the resignation, removal or redeployment of the staff member.

### **Contractors**

- 10.22 The Trust will ensure that any contractor, or any employee of the contractor, has been subject to the appropriate level of DBS check. Contractors engaging in regulated activity will require an enhanced DBS certificate (including barred list information).
- 10.23 For all other contractors who are not engaging in regulated activity, but whose work provides them with an opportunity for regular contact with children, an enhanced DBS check (not including barred list information) will be required.
- 10.24 Under no circumstances will a contractor in respect of whom no checks have been obtained be allowed to work unsupervised or engage in regulated activity.
- 10.25 If a contractor is self-employed, the Trust will consider obtaining the DBS check, as self-employed people are not able to make an application directly to the DBS on their own account.
- 10.26 The Trust will always check the identity of contractors and their staff on arrival.

### **Adults who supervise children on work experience**

- 10.27 If the Trust is organising work experience placements, the Trust will ensure that the placement provider has policies and procedures in place to protect children from harm.
- 10.28 Barred list checks by the DBS might be required on some people who supervise a child under the age of 16 on a work experience placement. In such cases, the Trust will consider the specific circumstances of the work experience. Consideration will be given

in particular to the nature of the supervision and the frequency of the activity being supervised, to determine what, if any, checks are necessary. These considerations will include whether the person providing the teaching/training/instruction/supervision to the child on work experience will be:

- Unsupervised themselves.
- Providing the teaching/training/instruction/supervision frequently (more than three days in a 30-day period or overnight).

10.29 If the person working with the child is unsupervised and the same person is in frequent contact with the child, the work is likely to be regulated activity. In this case, the Trust will ask the employer providing the work experience to ensure that the person providing the instruction or training is not a barred person.

10.30 If the activity undertaken by the child on work experience takes place in a 'specified place', such as a school, and gives the opportunity for contact with children, this may itself be considered regulated activity. In these cases, and where the child is 16 years of age or over, the work experience provider will consider whether a DBS enhanced check should be requested for the child/young person in question. DBS checks cannot be requested for children/young people under the age of 16.

### **Children staying with host families**

10.31 The Trust may make arrangements for a child to have learning experiences where, for short periods, the child may be provided with care and accommodation by a host family to whom they are not related. In these circumstances, the LA will be consulted.

### **Governors**

10.32 The Local School Board may request an enhanced DBS certificate without a barred list check on an individual as part of the appointment process for governors. An enhanced DBS certificate (which will include a barred list check) will only be requested if the Governor will be engaging in regulated activity; this also applies to volunteer Governors.

10.33 Associate Members will not be asked to undertake a DBS check.

10.34 Trustees and Members will be subject to a section 128 check.

10.35 Newly appointed Chairs of Trustees will be subject to a suitability check, which includes:

- An identity check.
- Confirmation of the right to work in the UK.
- An enhanced DBS check.
- Where required, additional information if the individual has lived outside the UK for a period of 12 months or longer.

10.36 Governors will be subject to a section 128 direction check.

### **After the pre-appointment checks**

11.1 Once the pre-employment checks have been completed, the recruitment panel and CIT HR will:

- Confirm a start date with the candidate.
- Submit contractual paperwork, including the completed DBS check, copies of

identification, references, proof of qualifications, pre-employment medical enquiry form, P45, application/equal opportunities and emergency contacts.

- Provide the required details of the checks carried out to the school to enable the SCR to be updated accordingly.

## **12. Single central record (SCR)**

12.1 Each school will maintain and regularly update the SCR. The SCR will be accessible to the Trust leadership and audited at regular intervals.

12.2. All new employees will be added to the record, which will include:

- All staff (including supply staff) who work at the Trust.
- All others who work in regular contact with children within the Trust, including volunteers.
- All members of the proprietor body.

12.3 The bullet points below set out the minimum information that must be recorded in respect of staff members (including teacher trainees on salaried routes). The record will indicate whether the following checks have been carried out or certificates obtained, and the date on which each check was completed/certificate obtained:

- An identity check
- A barred list check
- An enhanced DBS check
- A prohibition from teaching check
- Further checks on people living or working outside the UK, including checks for European Economic Area (EEA) teacher sanctions and restrictions
- A check of professional qualifications
- A section 128 check
- A check to establish the person's right to work in the UK
- For those in management, trustee or governor roles, a section 128 check

12.4 For supply staff, the Trust will include whether written confirmation has been received that the employment business supplying the member of supply staff has carried out the relevant checks and obtained the appropriate certificates, and the date that confirmation was received and whether any enhanced DBS check certificate has been provided in respect of the member of staff.

12.5 If checks are carried out on volunteers, this will be recorded in the SCR.

## **13. Safer recruitment training**

13.1 At least one member of the recruitment panel will have completed formal safer recruitment training.

13.2 As a measure of good practice, the Trust will ensure that this training is renewed **every five years.**

## **14. Monitoring and review**

14.1 This policy is reviewed annually by the HR Director.

14.2 Any changes made to this policy will be communicated to all members of staff and

relevant stakeholders.

## Flowchart of Disclosure and Barring Service Criminal Record Checks and Barred List Checks

