

# Safer Recruitment Policy

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<b>School:</b>	<i>All</i>
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## 2. Issue and Revision History

Issue	Description	Author	Effective Date
1.0	Initial Release	T. Warner	01/06/11
1.1	Review	T. Warner	01/09/12
2.0	Annual Review	T. Warner / J. Payne	26/08/13
2.1	Annual Review	T. Warner	02/09/14
2.2	Annual Review	D. Payne	27/08/15
2.3	Annual Review Renamed Policy to Safer Recruitment Policy Updated Summary Inclusion of KCSIE, SCR Inclusion of Rehab of Offenders Act 1974 Inclusion of Prevent duty Removal of Training	D. Payne / T. Warner	09/02/17
2.4	Annual Review	T. Warner	14/03/18
2.5	Annual Review	T. Warner	19/03/19
2.6	Annual Review. Reword final paragraph 7.2 Addition of DBS Update Service to 7.5.2 7.5.4.1 Inclusion of HR Director approval Addition of 7.6.2 and reference to F0013HR Probationary Review Form	T. Warner	05/08/20
3.0	Annual Review Rewrite in line with ISS and OfSTED standards. All sections.	T. Warner	12/10/21
3.1	Annual Review (KCSIE22) 9.4.1 Statement re CV's 9.4 Addition of online search as due diligence 10.1 Addition of points 3 & 4 re TRA and GTCE	T. Warner	01/09/22
3.2	Annual Review (KCSIE23)	T. Warner	01/09/23

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	9.4 Online due diligence notification to candidates added 9.7 Retention of Documents added 10.3 Removal of 3 year checking for existing staff members		
3.3	Annual Review (KCSIE24) 10. Addition of 'Update Service' - Updated wording for new employees starting work whilst awaiting DBS checks to 'appropriately supervised' 10.3.1 Updated to include contract obligation of joining the DBS Update Service Addition of 10.3.3.3 A prohibited person must not be appointed	T. Warner	26/08/24

### 3. Summary

The recruitment and selection of staff will be conducted in a professional, timely and responsive manner and in compliance with current employment legislation, and relevant safeguarding legislation and statutory guidance (including KCSIE and Prevent Duty Guidance).

Prior to undertaking recruitment activity for vacancies other than the Head of School, the Head of School will, working with a senior manager as appropriate, ensure that there is a review of the job description and person specification and ensure that this document is an accurate reflection of the role to be filled.

To ensure equality of opportunity, Educ8 will advertise all vacant posts to encourage as wide a field of applicants as possible, normally this entails an external advertisement. Those wishing to apply are sent a Recruitment Pack containing a job description, person specification and an Educ8 Application form. Application forms make it clear that positions applied for are exempt from the provision of the Rehabilitation of Offenders Act 1974.

During the shortlisting process all applications will be assessed equally against the same criteria, without exception or variation. The shortlisting and interview panels

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will normally be made up of the same members of staff to ensure consistency and fairness.

References will be requested prior to interview, to enable the panel to compare the information received against the candidate's application form and their answers at interview, as well as allowing for any discrepancies to be explored at interview.

The selection process for shortlisted candidates will, as a minimum, consist of a face-to-face selection interview with an interview panel, with other selection activities (such as classroom observation; group activities; written work) determined by the nature and duties of the vacant post. Other selection activities may also be conducted in a 2nd stage interview such as classroom observation; group activities; written work etc. This will be determined by the nature and duties of the vacant post.

Any offer of employment made to the preferred candidate will be made conditionally, in writing, subject to satisfactory completion of pre-employment checks. The candidate will not normally commence employment until all relevant pre-employment checks have been completed and must not start until at least the candidate's identity and right to work in the UK have been established.

All new employees will be given an induction programme which will clearly identify Educ8's key policies and procedures (1 Health and Safety Policy, 2 Safeguarding & Child Protection, 3 Equality & Diversity). A key element of the induction is to make clear the expectations which will govern how staff carry out their roles and responsibilities.

In addition to the various staff records kept on individual personnel files, a Single Centralised Record (SCR) of recruitment and vetting checks is kept. This will include information about staff, the executive board, volunteers and subcontractors.

#### **4. Document Release**

This document has been reviewed in accordance with the Educ8 Quality System and the requirements of this policy/procedure. Staff have been made aware of its issue, including any updates/amendments to its contents and where necessary appropriate training has been provided to those staff.

Where policies are available for download online, the previous version is removed and this new version replaces it.

The release of this document is indicated by the effective date.

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## 5. Purpose

The purpose of this policy is to help deter, reject or identify people who might abuse learners or are otherwise unsuited to working with them by having appropriate procedures for appointing staff.

This policy complies with the recommendations in the following documents:

- DfE Guidance “[Keeping Children Safe in Education: for schools and colleges](#)” (KCSIE) (updated September 2022),
- DfE ‘[Working Together to Safeguard Children](#)’ 2018b,
- [Prevent Duty Guidance](#),
- Safer Recruitment Consortium ‘[Guidance for safer working practice for those working with children and young people in education settings](#)’
- NSPCC [Safer Recruitment Guidance](#)

## 6. Scope

This policy applies to all Educ8 staff and volunteers including senior managers and the Executive Board. All aspects of recruitment including position profiling, advertising, selection, appointment, vetting, induction and probation are within the scope of this policy.

Employees involved in the recruitment and selection of staff are responsible for familiarising themselves with and complying with the provisions of this policy.

## 7. Definitions and Acronyms

Delivery Staff	Staff employed by Educ8 to provide instruction and tutoring services
DBS	Disclosure & Barring Service
DSP	Designated Senior Person(s) for Child Protection
Learners	All students, participants and users of Educ8

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learning programmes. Generally these are under 18 years of age.

KCSIE	DfE Document: ' <a href="#">Keeping Children Safe in Education: for schools and colleges</a> ' (see GOV.UK for most recent version)
SCR	Single Central Register
DPA	Data Protection Act
TRA	Teaching Regulation Agency
School	Educ8 Alternative Education Site registered with OfSTED as an independent school.
Head of School	Educ8 Staff member with management and leadership responsibility for an Educ8 Alternative Education School
Executive Board	Directors/Senior staff with Governance responsibilities for the school(s)
GTCE	General Teaching Council for England

## 8. Policy

### 8.1 Aims and Objectives

The aims of Educ8's Safer Recruitment policy are as follows:

- to ensure that the best possible staff are recruited on the basis of their merits, abilities and suitability for the position;
- to ensure that all job applicants are considered equally and consistently;
- to ensure that no job applicant is treated unfairly on any grounds including race, colour, nationality, ethnic or national origin, religion or religious belief, sex or sexual orientation, marital or civil partner status, disability or age;
- to ensure compliance with all relevant legislation, recommendations and guidance including the statutory guidance published by the Department for Education (DfE), Keeping Children Safe in Education (KCSIE), the Prevent Duty Guidance and any guidance or code of practice published by the Disclosure and Barring Service (DBS); and



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- to ensure that the school meets its commitment to safeguarding and promoting the welfare of children and young people by carrying out all necessary pre-employment checks.

The school has a principle of open competition in its approach to recruitment and will seek to recruit the best applicant for the job. The recruitment and selection process should ensure the identification of the person best suited to the job at the school based on the applicant's abilities, qualification, experience and merit as measured against the job description and person specification.

The recruitment and selection of staff will be conducted in a professional, timely and responsive manner and in compliance with current employment legislation, and relevant safeguarding legislation and statutory guidance (including KCSIE and Prevent Duty Guidance).

If a member of staff involved in the recruitment process has a close personal or familial relationship with an applicant they must declare it as soon as they are aware of the individual's application and avoid any involvement in the recruitment and selection decision-making process.

The school aims to operate this procedure consistently and thoroughly while obtaining, collating, analysing and evaluating information from and about applicants applying for job vacancies at any and all Educ8 schools.

## 8.2 Roles & Responsibilities

It is the responsibility of the Executive Board to:

- Ensure the school has effective policies and procedures in place for recruitment of all staff and volunteers in accordance with DfE guidance and legal requirements.
- Monitor the school's compliance with them.

It is the responsibility of the Head of School and Deputy Head of School to:

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- Ensure that the school operates safe recruitment procedures and makes sure all appropriate checks are carried out on all staff and volunteers who work at the school.
- To monitor contractors' and agencies' compliance with this document.
- Promote welfare of children and young people at every stage of the procedure.

The Executive Board has delegated responsibility to the Head of School (teaching staff) to lead in all appointments. Senior Leaders may be involved in staff appointments but the final decision will rest with the Head of School.

### **8.3 Definition of Regulated Activity and Frequency**

Any position undertaken at, or on behalf of the school will amount to "regulated activity" if it is carried out:

- frequently, meaning once a week or more; or
- overnight, meaning between 2.00 am and 6.00 am; or
- satisfies the "period condition", meaning four times or more in a 30-day period; and
- provides the opportunity for contact with children.

Roles which are carried out on an unpaid/voluntary basis will only amount to regulated activity if, in addition to the above, they are carried out on an unsupervised basis.

Educ8 schools are not permitted to check the Children's Barred List unless an individual will be engaging in "regulated activity".

Educ8 is required to carry out an enhanced DBS check for all staff, supply staff\* and Executive Board Members who will be engaging in regulated activity. However, Educ8 can also carry out an enhanced DBS check on a person who would be carrying out regulated activity but for the fact that they do not carry out their duties frequently enough i.e. roles which would amount to regulated activity if carried out more frequently.

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\*Supply staff provided by an agency or contractor are required to demonstrate their compliance with Safer Recruitment Procedures. Such compliance will be monitored every 3 years and will be maintained on a separate tab of the SCR.

## **9. Recruitment and Selection Procedure**

### **9.1 Vacancy Determination and Initiating Recruitment Activity**

Where a Head of School vacancy arises, the Executive Head will notify the Executive Board that such a vacancy exists. Liaison with Educ8's HR Department will normally take place at the outset of this process.

The Executive Board will review such a leadership vacancy in accordance with the current needs of the school, including the Head of Schools pay range, job description/person specification and the key tasks the new Head of School will need to address, having regard to improvement strategies.

Where a vacancy relates to any other position within the schools existing staffing structure, it is the Head of Schools responsibility to determine that a vacancy exists and to review whether any such vacancy is to be filled or reviewed before initiating any recruitment activity.

Where the Head of School wishes to create a new position which is in addition to the agreed staffing structure of the school, he or she will present a case for such a position to the Executive Head for approval. Once approved, the Head of school can initiate recruitment activity.

#### **9.1.1 Job Descriptions and Person Specifications**

A job description is a key document in the recruitment process, and must be finalised prior to taking any other steps in the process. It will clearly and accurately set out the duties and responsibilities of the job role.

The person specification is of equal importance and informs the selection decision. It details the skills, experience, abilities and expertise that are required to do the job. The person

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specification will include a specific reference to suitability to work with children.

Both of these documents are contained within [T0073HR Recruitment Pack Template](#)

## 9.2 Planning for Recruitment

Prior to undertaking recruitment activity for vacancies other than the Head of School, the Head of School will, working with a senior manager as appropriate, ensure that there is a review of the job description and person specification and ensure that this document is an accurate reflection of the role to be filled.

The Head of School alongside the Executive Head will make a determination as to whether a role is to be filled on a permanent, fixed-term, temporary or any other basis, taking into account any advice received from the Educ8 HR department.

## 9.3 Advertising

If any form of advertising is used to recruit staff, it should reflect:

- The responsibilities of the role;
- The level of experience or qualification required;
- Essential and desirable attributes are clearly identified
- Educ8's commitment to safeguarding and promoting the welfare of children and young people
- The requirement for all staff to go through robust vetting procedures including an Enhanced DBS.
- A statement informing all potential applicants that it is a criminal offence to apply for this position if they have been barred from teaching or working in any educational setting, school, college or Early Years setting.

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To ensure equality of opportunity, Educ8 will advertise all vacant posts to encourage as wide a field of applicants as possible, normally this entails an external advertisement.

All documentation relating to applicants will be treated confidentially in accordance with the DPA.

#### **9.4 Shortlisting and Selection Processes**

Educ8 recognises that it is a legislative requirement (School Staffing (England) Regulations 2009) that at least one member of a selection panel must have completed safer recruitment training. A selection panel will not be convened without at least one panel member having been appropriately trained in safer recruitment.

For the position of Head of School or Executive Head, the selection panel will consist of a minimum of three Executive Board members. For all other posts the panel will normally consist of at least two senior members of staff.

The shortlisting and interview panels will normally be made up of the same members of staff to ensure consistency and fairness.

During the shortlisting process all applications will be assessed equally against the same criteria, without exception or variation. All applications will be carefully scrutinised, with particular care paid to any gaps in employment; repeated and/or regular/frequent changes in employment; and anomalies or discrepancies in information contained within the form. Any such concerns will be taken up with the candidate at interview and will be satisfactorily resolved before any firm offer of employment is made.

As part of the shortlisting process we may carry out an online search as part of our due diligence on the shortlisted candidates. This can help identify any incidents or issues that have happened, and that are publicly available online, which interviewers might want to explore with the applicant at interview. We notify applicants of this within our application form (KCSIE '23)

Applicants will be shortlisted (using [F0070 Recruitment Shortlist Form](#)) by cross referencing the Job Description and

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Person Specification for the role against the completed [F0003HR Application for Employment Form](#).

#### 9.4.1 Applications

Educ8 uses its own application form and all applicants for employment will be required to complete an [F0003HR Application for Employment Form](#) containing questions about their academic and full employment history and their suitability for the role (in addition all applicants are required to account for any gaps or discrepancies in employment history). **Applicants submitting an incomplete application form will not be shortlisted.**

Application forms make it clear that positions applied for are exempt from the provision of the Rehabilitation of Offenders Act 1974.

It is unlawful for Educ8 to employ anyone who is barred from working with children. It is a criminal offence for any person who is barred from working with children to apply for a position with Educ8.

All applicants are made aware through a statement displayed on the [F0003HR Application for Employment Form](#)

*'...that providing false information is an offence and could result in the application being rejected or summary dismissal if the applicant has been selected, and referral to the police and/or the DBS and TRA'.*

Further details concerning referrals to the DBS and TRA can be found at [9.7](#))

Photographic ID along with proof of address are stored within personnel files.

We only accept copies of a curriculum vitae alongside an application form. A curriculum vitae on its own will not provide adequate information.

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#### 9.4.2 References

References will be requested prior to interview, to enable the panel to compare the information received against the candidate's application form and their answers at interview, as well as allowing for any discrepancies to be explored at interview. References requested at this stage of the process will exclude requests for health information.

All offers of employment will be subject to the receipt of a minimum of two references which are considered satisfactory by the school. One of the references must be from the applicant's current or most recent employer. If the current/most recent employment does/did not involve work with children, then the second reference should be from the employer with whom the applicant most recently worked with children. The referee should not be a relative. References will always be sought and obtained directly from the referee and their purpose is to provide objective and factual information to support appointment decisions.

All referees will be asked whether they believe the applicant is suitable for the job for which they have applied and whether they have any reason to believe that the applicant is unsuitable to work with children. Referees will also be asked to confirm that the applicant has not been radicalised, so that they do not support terrorism or any form of "extremism".

##### 9.4.2.1 References are requested by email using [F0031HR New Employee Reference Alt Ed](#)

References are verified by telephone if there is a doubt as to their authenticity.

Please note that no questions will be asked about health or medical fitness prior to any offer of employment being made.

Any discrepancies or anomalies will be followed up.

Where an applicant has indicated on their application form that they do not wish their current employer to be

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contacted at that stage, this reference will be taken up immediately after interview.

#### 9.4.3 Interviews

The selection process for shortlisted candidates will, as a minimum, consist of a face-to-face selection interview with an interview panel, with other selection activities (such as classroom observation; group activities; written work) determined by the nature and duties of the vacant post.

There will be a face-to-face interview wherever possible, and a minimum of two interviewers will see the applicants for the vacant position. The interview process will explore the applicant's ability to carry out the job description and meet the person specification. It will enable the panel to explore any anomalies or gaps which have been identified in order to satisfy themselves that the chosen applicant can meet the safeguarding criteria (in line with Safer Recruitment Training).

Any information in regard to past disciplinary action or allegations, cautions or convictions will be discussed and considered in the circumstance of the individual case during the interview process, if it has been disclosed on the application form.

At least one member of any interviewing panel will have undertaken safer recruitment training or refresher training as applicable.

All applicants who are invited to an interview will be required to bring evidence of their identity, address and qualifications. Original documents will only be accepted and photocopies will be taken. Unsuccessful applicant documents will be destroyed 6 months after the recruitment programme.

Other selection activities may also be conducted in a 2nd stage interview such as classroom observation; group activities; written work etc. This will be determined by the nature and duties of the vacant post.

Interviews will be documented using [F0068HR Interview Assessment Form](#) and selection made and recorded using [F0069HR Interview Summary Sheet](#).



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## 9.5 Outcome of Selection Processes

A selection decision will be made based on a fair and thorough assessment of the skills and abilities demonstrated by all the candidates against the requirements of the person specification/job description during the selection process.

Any offer of employment made to the preferred candidate will be made conditionally, in writing, subject to satisfactory completion of pre-employment checks (see 8.6).

In Head of School and Executive Head recruitment, the selection panel will make a recommendation to the Executive Board for the appointment of one of the applicants, with the determination of whether to appoint sitting with the Executive Board and not the selection panel.

For all other appointments relating to school staff, the power to appoint will rest with the Head of School.

## 9.6 Offers of Employment

Offers made prior to satisfactory completion of pre-employment checks must be made on a conditional basis. Conditional offers of employment must only be confirmed once all pre-employment checks have been satisfactorily completed.

Contracts of employment will be received by the individual within 8 weeks of the first day of their employment and therefore pre-employment checks are required to be satisfactorily completed within 8 weeks. Where such checks are not completed within this timeframe, and the withdrawal of a conditional offer of employment is being considered, the Fitness and Suitability for Work policy will be followed.

## 9.7 Retention of Documents

Copies of DBS certificates and records of criminal information disclosed by the candidate will be retained for a period of no longer than 6 months.

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Identity documents including right to work documentation and qualifications should also only be kept when a valid reason exists to do so and for no longer than 6 months.

## 10. Pre-employment Checks

Educ8 recognises its statutory responsibility to carry out pre-employment checks for all new staff as well as to update the SCR prior to new staff commencing employment.

The selection panel alongside Educ8's HR Department will act reasonably in making decisions about the suitability of prospective employees based on checks and evidence, which will include the following where appropriate:

- DBS checks (including the Update Service)
- barred list checks
- prohibition checks
- right to work and identity checks
- health declaration and fitness for work declaration
- references
- application forms
- interview information
- checks of relevant academic and professional qualifications

Any unsatisfactory pre-employment checks may lead to the consideration of withdrawal of a conditional offer of employment. Where consideration is being given to withdrawing an offer on the basis of pre-employment checks, advice will be sought from Educ8's HR Department.

The candidate will not normally commence employment until all relevant pre-employment checks have been completed and must not start until at least the candidate's identity and right to work in the UK have been established.

In exceptional circumstances, the Head of School may determine to allow an individual to commence employment in regulated activity prior to the receipt of a DBS check. In these circumstances, all other checks, including a separate

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barred list check where appropriate, must have been completed and he or she will **be appropriately supervised**. A risk assessment (using [F0021HR Starting Work Prior to DBS Form](#)) will also be carried out to determine whether other safeguarding measures may need to be put in place.

Individuals who have lived or worked outside of the UK will be subject to the same pre-employment checks as all other staff. In addition, further appropriate checks, such as an overseas police check, will be made as necessary in order to sufficiently establish the individual's suitability to be appointed.

For individuals who work at the school via an employment agency, the school will obtain written notification from the agency that the necessary checks that the school would normally otherwise perform have been carried out, prior to engaging the individual. The school will also check that the individual arriving at the school for work is the same person on whom the checks have been made.

For trainee/student teachers who are salaried by the school, the school will ensure that all necessary checks are carried out. For other trainee/student teachers, it is the responsibility of the initial teacher training provider to carry out the necessary checks and for the school to ensure that such checks have been undertaken prior to deployment within the school.

### **10.1 New Employee Vetting Process**

If it is decided to make an offer of employment following the formal interview, any such offer will be conditional on the following:

- the agreement of a mutually acceptable start date and the signing of a contract incorporating Educ8's standard terms and conditions of employment;
- verification of the applicant's identity (if not previously been verified);
- the receipt of two references (one of which must be from the applicant's most recent employer) which Educ8 considers to be satisfactory;
- for positions which involve "teaching work":
  1. the school being satisfied that the applicant is not, and has never been, the subject of a sanction, restriction or prohibition issued by the Teaching Regulation Agency (formerly National College for Teaching and Leadership),

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or any predecessor or successor body, or by a regulator of the teaching profession in any other European Economic Area country which prevents the applicant working at the school or which, in the Educ8's opinion, renders the applicant unsuitable to work at the school; and

2. the school being satisfied that the applicant is not, and has never been, the subject of any proceedings before a professional conduct panel or equivalent body in the UK or any other country for any reason which prevents the applicant working at the school or which, in Educ8's opinion, renders the applicant unsuitable to work at the school;
  3. The Teaching Regulation Agency's (TRA) Employer Access Service should be used to verify any award of qualified teacher status (QTS), and the completion of teacher induction or probation.
  4. There are a number of individuals who are still subject to disciplinary sanctions, which were imposed by the GTCE (prior to its abolition in 2012). The [TRA Secure Access system](#) allows GTCE checks to be made.
- where the position amounts to "regulated activity the receipt of an enhanced disclosure from the DBS which the school considers to be satisfactory;
  - where the position amounts to "regulated activity" confirmation that the applicant is not named on the Children's Barred List;
  - confirmation that the applicant is not subject to a direction under section 142 of the Education Act 2002 which prohibits, disqualifies or restricts them from providing education at a school, taking part in the management of an independent school or working in a position which involves regular contact with children;
  - confirmation that the applicant is not subject to a direction under section 128 of the Education and Skills Act 2008 which prohibits, disqualifies or restricts them from being involved in the management of an independent school;

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- verification of the applicant's medical fitness for the role;
- verification of the applicant's right to work in the UK;
- any further checks which are necessary as a result of the applicant having lived or worked outside of the UK; and
- verification of professional qualifications which the school deems a requirement for the post, or which the applicant otherwise cites in support of their application (where not previously verified).

Whether a position amounts to "regulated activity" must therefore be considered by the school in order to decide which checks are appropriate. It is however likely that in nearly all cases Educ8 will be able to carry out an enhanced DBS check and a Children's Barred List check.

Educ8 is not permitted to check the Children's Barred List unless an individual will be engaging in "regulated activity". Educ8 is required to carry out an enhanced DBS check for all staff, supply staff and Executive Board Members who will be engaging in regulated activity. However, Educ8 can also carry out an enhanced DBS check on a person who would be carrying out regulated activity but for the fact that they do not carry out their duties frequently enough i.e. roles which would amount to regulated activity if carried out more frequently.

A personal file checklist will be used to track and audit paperwork obtained in accordance with Safer Recruitment Training. The checklist will be retained electronically.

## 10.2 The Rehabilitation of Offenders Act 1974

The Rehabilitation of Offenders Act 1974 does not apply to positions which involve working with, or having access to pupils.

Therefore, any convictions and cautions that would normally be considered 'SPENT' **must be** declared when applying for any position within Educ8. This is clearly stated on the [F0003HR Application for Employment Form](#) and forms the basis of [T0028SA Statement of Suitability](#) which all staff are required to complete at induction.

## 10.3 DBS (Disclosure and Barring Service) Check

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Educ8 applies for an enhanced disclosure from the DBS and a check of the Children's Barred List (now known as an Enhanced Check for Regulated Activity) in respect of all positions at within Educ8 which amount to "regulated activity" as defined in the Safeguarding Vulnerable Groups Act 2006 (as amended). The purpose of carrying out an Enhanced Check for Regulated Activity is to identify whether an applicant is barred from working with children by inclusion on the Children's Barred List and to obtain other relevant suitability information. All applicants applying for a DBS check should read the DBS Code of Practice, this can be found at: <https://www.gov.uk/government/publications/dbs-codeof-practice> or alternatively a copy can be requested from Educ8's HR Department.

It is Educ8's policy that the DBS disclosure must be obtained before the commencement of employment of any new employee, unless in exceptional circumstances (see section 9).

It is Educ8's policy to re-check employees' DBS Certificates if an employee takes leave for more than three months (ie maternity leave, career break etc).

Members of staff at Educ8 are aware of their obligation to inform the Head of School or the HR Department of any cautions or convictions that arise between these checks taking place.

DBS checks will still be requested for applicants with recent periods of overseas residence and those with little or no previous UK residence.

#### 10.3.1 Portability of DBS Certificate Checks

Staff are contractually obliged to join the DBS Update Service. This allows for portability of a certificate across employers and rechecking as required.

Educ8 will:

- Obtain consent from the applicant to carry out an update search.
- Confirm the Certificate matches the individual's identity.
- Examine the original certificate to ensure that it is for the appropriate workforce and level of check, ie enhanced certificate/enhanced including barred list information.

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The Update check would identify and advise whether there has been any change to the information recorded, since the initial Certificate was issued.

Applicants will be able to see a full list of those organisations that have carried out a status check on their account.

### 10.3.2 DBS Certificate

The DBS no longer issue Disclosure Certificates to employers, therefore employees/applicants should bring their original Certificate to their Head of School or directly to the HR Department of Educ8 (for employees within 7 days of issue or applicants before they commence work or any project involving regulated activity).

### 10.3.3 Dealing with Convictions

Educ8 operates a formal procedure if a DBS Certificate is returned with details of convictions. Consideration will be given to the Rehabilitation of Offenders Act 1974 and also:

- the nature, seriousness and relevance of the offence;
- how long ago the offence occurred;
- one-off or history of offences;
- changes in circumstances,
- decriminalisation and remorse.

10.3.3.1 A formal meeting will take place face-to-face to establish the facts with the Line Manager. A decision will be made following this meeting. In the event that relevant information (whether in relation to previous convictions or otherwise) is volunteered by an applicant during the recruitment process or obtained through a disclosure check, the Line Manager will evaluate all of the risk factors above before a position is

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offered or confirmed. This is documented using the [F0007HR Positive DBS Disclosure Decision Form](#). Any decision must be approved by the HR Director.

10.3.3.2 If an applicant wishes to dispute any information contained in a disclosure, they may do so by contacting the DBS. In cases where the applicant would otherwise be offered a position were it not for the disputed information, Educ8 may, where practicable and at its discretion, defer a final decision about the appointment until the applicant has had a reasonable opportunity to challenge the disclosure information.

10.3.3.3 A person who is prohibited **must not be** appointed to a role that involves teaching work (as defined in the Teachers' Disciplinary (England) Regulations 2012)

## 10.4 Induction

All new employees will be given an induction programme which will clearly identify Educ8's key policies and procedures ([1 Health and Safety Policy](#), [2 Safeguarding & Child Protection](#), [3 Equality & Diversity](#)). A key element of the induction is to make clear the expectations which will govern how staff carry out their roles and responsibilities.

All staff (paid or voluntary) will have an induction conducted by their line manager using [WI0001HR Induction Checklist](#) in which:

- An [F0020HR Employee Induction Form](#) is completed
- The roles, responsibilities and expectations of the job are clarified referring to an appropriate *Position Profile*
- Company procedures are explained and training needs established – this is recorded using SMART



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objectives on the [F0013HR Probationary Review Form](#)

- Qualifications and Identity are verified and copies placed within their personnel file
- [D0006HR Staff & Volunteers Code of Conduct](#) is issued and signed electronically
- [T0028SA Statement of Suitability to Work with Young People](#) is issued and signed electronically
- [F0014SA KCSIE & Safeguarding Declaration](#) understood and signed
- A copy of [D0013HR Educ8 Staff Handbook](#) is provided

#### 10.4.1 Single Central Register (SCR)

In addition to the various staff records kept on individual personnel files, a single centralised record of recruitment and vetting checks is kept. This is kept up-to-date and retained by the HR Director. The SCR will contain details of the following:

- All employees who are employed to work at Educ8
- all employees who are employed as supply staff to Educ8 whether employed directly or through an agency
- all others who have been chosen by Educ8 to work in regular contact with children. This will cover volunteers, Governors, peripatetic staff and people brought into Educ8 to provide additional teaching or instruction for pupils but who are not staff members eg: sports coaches etc.

#### 10.4.2 Probationary Period

As part of their induction and probationary period all new employees will be reviewed. A [F0013HR Probationary](#)

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[Review Form](#) will be used to set objectives and record review meetings with the ultimate aim of enabling new employees to be competent in their roles to a satisfactory standard by the end of their probationary period.

### 10.5 Visiting Speakers (and Prevent Duty)

The Prevent Duty Guidance requires Educ8 to have clear protocols for ensuring that any visiting speakers, whether invited by staff or by pupils, are suitable and appropriately supervised.

Educ8 is not permitted to obtain a DBS disclosure or Children's Barred List information on any visiting speaker who does not engage in regulated activity within Educ8 or perform any other regular duties for or on behalf of Educ8.

All visiting speakers will be subject to Educ8's usual visitors signing in protocol. This will include signing in and out, and being escorted by a fully vetted member of staff between appointments.

Educ8 will also obtain such formal or informal background information about a visiting speaker as is reasonable in the circumstances to decide whether to invite and/or permit a speaker to attend the site. In doing so Educ8 will always have regard the Prevent Duty Guidance and the definition of "extremism" set out in KCSIE which states:

*"'Extremism' is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas. Terrorist groups very often draw on extremist ideas developed by extremist organisations."*

In fulfilling its Prevent Duty obligations Educ8 does not discriminate on the grounds of race, colour, nationality, ethnic or national origin, religion or religious belief, sex or sexual orientation, marital or civil partner status, disability or age.

### 10.6 Ongoing Employment

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Educ8 recognises that safer recruitment and selection is not just about the start of employment, but should be part of a larger policy framework for all staff. Educ8 will therefore provide ongoing training and support for all staff, as identified through the Annual Review/appraisal procedure.

## 10.7 Leaving Employment

Despite the best efforts to recruit safely there will be occasions when allegations of serious misconduct or abuse against children and young people are raised. This policy is primarily concerned with the promotion of safer recruitment and details the pre employment checks that will be undertaken prior to employment being confirmed. Whilst these are pre-employment checks Educ8 also has a legal duty to make a referral to the DBS in circumstances where an individual:

- has applied for a position with Educ8 despite being barred from working with children; or
- has been removed by Educ8 from working in regulated activity (whether paid or unpaid), or has resigned prior to being removed, because they have harmed, or pose a risk of harm to, a child.

**To make a referral to the DBS** a [DBS Barring Referral Form](#) must be used. This form contains further information and details of how to complete the form.

If the individual referred to the DBS is a teacher, Educ8 may also decide to **make a referral to the TRA**. Referrals to the TRA must be made using the [Teacher misconduct referral form for employers](#). Further details on how to complete the form can be obtained from [GOV.UK](#)

## 10.8 Agency and third-party workers

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. When using agency workers we will add them to the SCR. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

## 10.9 Contractors

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We will ensure that any contractor, or any employee of the contractor, who is to work at the site has had the appropriate level of DBS check this will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children

We will obtain the DBS check for self-employed contractors.

We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the site.

#### **10.10 Trainee/student teachers**

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

#### **10.11 Volunteers**

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity

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- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment

#### **10.12 Staff acting in a Governance Role:**

Will have an enhanced DBS check without barred list information.

They will have an enhanced DBS check with barred list information if working in regulated activity.

The chair of the board will have their DBS check countersigned by the secretary of state. All governors/executive board members will also have the following checks:

- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

#### **10.13 Staff working in alternative provision settings**

Where we place children/young people with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform

#### **10.14 Adults who supervise learners on work experience**

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a child under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

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### 10.15 Existing Staff

If allegations have been made about an existing member of staff's suitability to work with children, we will carry out all the relevant checks as if the individual was a new member of staff. We will also do this if an individual moves from a post that is not regulated activity to one that is.

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- We believe the individual has engaged in relevant conduct; or
- The individual has received a caution or conviction for a relevant offence, or there is reason to believe the individual has committed a listed relevant offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009; or
- The 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

## 11. Metrics

The HR Director will be responsible for ensuring that this policy is monitored and evaluated. This will be undertaken through formal audits of job vacancies and a yearly Safer Recruitment Evaluation audit which will be presented to the governing body. This will include:

- SCR Overview & Completeness - number of entries per school, numbers per role etc.
- Starters & Leavers
- Adverts, Applications, Interviews, Appointments
- Reports to DBS & TRA

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- Training completed
- Allegations against staff

## 12. Quality Records

The following Quality Records shall be generated and managed in accordance with Doc. 10:

Required Record	Custodian
Completed Statement of Suitability	HR Director
Completed Staff Code of Conduct	HR Director
Completed KCSIE Declaration	HR Director
Completed DBS Disclosure Record Form	HR Director
Completed Induction Form	HR Director
Completed Application Form	HR Director
Completed Probationary Review Form	HR Director
Completed Interview Assessment Forms	HR Director
Completed Interview Summary Sheets	HR Director
Completed New Employee Reference Alt Ed	HR Director
Completed Recruitment Shortlist Forms	HR Director

## 13. Form(s)/Template(s)

There following form(s)/template(s) are required for this document:

Form Number	Title
F0020HR	<a href="#">Employee Induction Form</a>

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F0013HR	<a href="#">Probationary Review Form</a>
F0003HR	<a href="#">Application for Employment Form</a>
T0028SA	<a href="#">Statement of Suitability to Work with Young People</a>
F0021HR	<a href="#">Starting Work Prior to DBS Form</a>
D0006HR	<a href="#">Staff &amp; Volunteers Code of Conduct</a>
F0014SA	<a href="#">KCSIE &amp; Safeguarding Declaration</a>
F0068HR	<a href="#">Interview Assessment Form</a>
F0069HR	<a href="#">Interview Summary Sheet</a>
F0031HR	<a href="#">New Employee Reference Alt Ed</a>
F0070HR	<a href="#">Recruitment Shortlist Form</a>
F0073HR	<a href="#">Recruitment Pack Template</a>



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## Appendix 'A' ID Checking Guidelines

### Identity Checking Documentation

This appendix outlines the documentation that is required to be seen by Line Managers in order to process new members of staff. It also explains the original documentation requirements for both Right to Work in the UK and DBS checks.

Further information:

[Guidance: ID checking guidelines for standard/enhanced DBS check applications from 3 September 2018](#)

### Introduction

The applicant must provide a range of ID documents as part of the DBS check application process. When checking these documents we must:

- follow the three route ID checking process as outlined
- check and validate the information provided by the applicant on the application form/continuation sheet
- establish the true identity of the applicant through the examination of a range of documents as set out in this guidance
- make sure the applicant provides details of all names by which they have been known
- make sure the applicant provides details of all addresses where they have lived in the last five years
- check that the application form is fully completed and the information it contains is accurate. Failing to do this can result in delays

When checking the validity of the documents it is best practice to carry out this examination face to face. Other alternative methods include via a live video link, for example Skype and FaceTime. In both cases you must be in physical possession of the original documents. **You must not rely on the inspection of the documents via a live video link or by checking a faxed or scanned copy of the document.**

If there are any discrepancies in the information provided by the applicant and/or the identity documents supplied, and fraud is not suspected, please ask the applicant to

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clarify. If you don't do this it may compromise the integrity of the DBS service and introduce risk to your recruitment or licensing arrangements.

You must not attempt to amend the application form without the applicant's knowledge and agreement. Doing this will invalidate the declaration by the applicant and may breach data protection legislation.

### What you must do as part of the ID checking process

- you must only accept valid, current and original documentation
- you must not accept photocopies
- you must not accept documentation printed from the internet e.g. internet bank statements
- identity information for the applicant's name, date of birth and address recorded in section A and section B on the DBS application form must be validated
- you should in the first instance, seek documents with photographic identity (e.g. passport, new style driving licence, etc.) and for this to be compared against the applicant's likeness
- all documents must be in the applicant's current name as recorded in section A
- one document must confirm the applicant's date of birth as recorded in section A
- you must ensure that the applicant declares all previous name changes, and provides documentary proof to support the change of name. If the applicant is unable to provide proof to support the change of name, you should hold a probing discussion with the applicant about the reasons why before considering to validate their identity
- you must see at least one document to confirm the applicant's current address as recorded in section B, in accordance with the guidance
- you must provide a full and continuous address history covering the last five years. Where possible you should seek documentation to confirm this address history
- you should cross-match the applicant's address history with any other information you have been provided with as part of the recruitment, such as

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their Curriculum Vitae (CV). This can highlight if an address has not been given e.g. if the applicant's CV shows that they have worked in Liverpool in the last five years, but the application form only shows London addresses, you may wish to question the applicant further about this

- a document from each of the groups should be included only once in the document count e.g. don't accept two bank statements as two of the required documents, if they are from the same bank
- you should not accept the foreign equivalent of an identity document if that document is listed as '(UK)' on the list of valid identity documents

The documents needed will depend on the route the application takes. The applicant must try to provide documents from Route 1 first.

### Three routes of ID checking

#### **Route 1**

The applicant must be able to show:

- *one document from Group 1, below*
- *2 further documents from either Group 1, or Group 2a or 2b, below*

At least one of the documents must show the applicant's current address.

If the applicant isn't a national of the UK or the EEA and is applying for voluntary work they may need to be fingerprinted if they can't show these documents.

#### **Route 2**

Route 2 can only be used if it's impossible to process the application through Route 1.

If the applicant isn't a national of the UK or the EEA and is applying for voluntary work they can't use Route 2. If the applicant doesn't have any of the documents in Group 1, then they must be able to show:

- one document from Group 2a
- 2 further documents from either Group 2a or 2b

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At least one of the documents must show the applicant's current address. The organisation conducting their ID check must then also use an appropriate external ID validation service to check the application.

EEA nationals who've been resident in the UK for 5 years or less may need to be fingerprinted if they can't show these documents.

### **Route 3**

Route 3 can only be used if it's impossible to process the application through Routes 1 or 2.

EEA nationals who've been resident in the UK for 5 years or less can't use Route 3.

For Route 3, the applicant must be able to show: \* a birth certificate issued after the time of birth (UK, Isle of Man and Channel Islands) \* one document from Group 2a \* 3 further documents from Group 2a or 2b

At least one of the documents must show the applicant's current address. If the applicant can't provide these documents they may need to be fingerprinted.

### **Unusual Addresses**

The address section of the DBS must be completed accurately in order to match the identity documentation provided. If an applicant does not have a straightforward address history further information can be obtained from GOV.UK [Guidance: DBS unusual addresses guide](#)

### **Group 1: Primary identity documents**

<b>Document</b>	<b>Notes</b>
Passport	Any current and valid passport
Biometric residence permit	UK
Current driving licence (full or provisional)	UK, Isle of Man, Channel Islands and EEA. From 8 June 2015, the paper counterpart to the photocard driving licence will not be valid and will no longer be issued by DVLA

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Birth Certificate (issued within 12 months of birth)	UK, Isle of Man and Channel Islands - including those issued by UK authorities overseas, for example embassies, High Commissions and HM Forces
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### Group 2a: Trusted government documents

Document	Notes
Current driving licence photocard (full or provisional)	All countries outside the EEA (excluding Isle of Man and Channel Islands)
Current driving licence (full or provisional) - paper version (if issued before 1998)	UK, Isle of Man, Channel Islands and EEA
Birth Certificate (Issued after time of birth)	UK, Isle of Man and Channel Islands
Marriage/civil partnership certificate	UK and Channel Islands
HM Forces ID card	UK
Firearms licence	UK, Channel Islands and Isle of Man
Immigration document, visa or work permit	Issued by a country outside the EEA. Valid only for roles whereby the applicant is living and working outside of the UK. Visa/permit must relate to the non EEA country in which the role is based

### Group 2b: Financial and social history documents

Document	Notes	Issue date and validity
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Mortgage Statement	UK or EEA	Issued in last 12 months
Bank or building society statement	UK and Channel Islands or EEA	Issued in last 3 months
Bank or building society statement	Countries outside the EEA	Issued in last 3 months - branch must be in the country where the applicant lives and works
Bank or building society account opening confirmation letter	UK	Issued in last 3 months
Credit card statement	UK or EEA	Issued in last 3 months
Financial statement, for example pension or endowment	UK	Issued in last 12 months
P45 or P60 statement	UK and Channel Islands	Issued in last 12 months
Council Tax statement	UK and Channel Islands	Issued in last 12 months
Letter of sponsorship from future employment provider	Non-UK or non-EEA only - valid only for applicants residing outside of the UK at time of application	Must still be valid
Utility bill	UK - not mobile telephone bill	Issued in last 3 months
Benefit statement, for example Child Benefit, Pension	UK	Issued in last 3 months
Central or local government, government agency, or local council document giving	UK and Channel Islands	Issued in last 3 months

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entitlement, for example from the Department for Work and Pensions, the Employment Service, HMRC		
EEA National ID card		Must be still valid
Irish Passport Card	Cannot be used with an Irish passport	Must be still valid
Cards carrying the PASS accreditation logo	UK, Isle of Man and Channel Islands	Must be still valid
Letter from head teacher or college principal	UK - for 16 to 19 year olds in full time education - only used in exceptional circumstances if other documents cannot be provided	Must still be valid

## Right to Work in the UK

You must not discriminate against anyone because of where they're from.

You can either:

### [CHECK THE APPLICANT'S ORIGINAL DOCUMENTS](#)

The above link takes you to the GOV.UK checking service and guides you through the process.

If the applicant has a UK passport and is a British Citizen (this will be indicated on the passport) then ***the applicant IS ENTITLED to work in the UK***

If checking the applicant's original documents:

- You must see the applicant's original documents
- You must check that the documents are valid with the applicant present
- You must make and keep copies of the documents and record the date you made the check

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## What to check

You need to check that:

- the documents are genuine, original and unchanged and belong to the person who has given them to you
- the dates for the applicant's right to work in the UK have not expired
- photos are the same across all documents and look like the applicant
- dates of birth are the same across all documents
- the applicant has permission to do the type of work you're offering (including any limit on the number of hours they can work)
- for students you see evidence of their study and vacation times
- if 2 documents give different names, the applicant has supporting documents showing why they're different, such as a marriage certificate or divorce decree

[CHECK THE APPLICANT'S RIGHT TO WORK ONLINE](#), if they've given you their share code

Check details of a job applicant's right to work in the UK, including:

- the types of work they're allowed to do
- how long they can work in the UK for, if there's a time limit
- You'll need the job applicant's:
  - date of birth
  - right to work share code\*

\*The share code is created when the applicant gives you permission to view their details.

Ask them to share the code with you.



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## Employing EU, EEA and Swiss citizens

Right to work checks will not change until 1 July 2021 for citizens of the EU, Switzerland, Norway, Iceland and Liechtenstein.

**Retrospective checks for existing employees are not required.**

Further information from GOV.UK [Guidance: Recruiting people from outside the UK](#)

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## APPENDIX 'B' Safer Recruitment Evaluation Checklist

Policy & Procedure	In Place	Not in Place	Responsibility
Safer Recruitment Policy updated and monitored on a regular basis	✓		HR Director
Consistency in recruitment procedures applied to all categories of employment	✓		HR Director
Use of Application Form	✓		HR Dept.
Use of Job Description & Person Specification	✓		HR Dept.
Referees asked to specifically comment on suitability of applicant	✓		HR Dept.
Two written references taken up	✓		HR Dept.
One member of panel to examine references prior to interview	✓		Panel
References followed up by a telephone reference	✓		Panel
References to be obtained for volunteers/supply/agency staff	✓		HR Dept.
Questions asked on applicants child protection awareness	✓		Panel
Explanation of gaps in employment	✓		Panel
Proof of identity sought – originals not copies	✓		Panel
Academic qualification checked – originals not copies	✓		Panel
Medical clearance prior to employment	✓		HR Dept.
No employment until DBS Certificate has been completed and original disclosure received	✓		HR Dept.
Above checks applied as appropriate to Overseas staff, supply/agency staff/gap/volunteers	✓		HR Dept.
Panel interviews undertaken	✓		Panel
Formal Job Offer provided (conditional)	✓		HR Dept.
SCR updated	✓		HR Dept.

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Formal induction programme undertaken	✓		Manager
Child Protection training / issue of Child Protection policy, Code of Conduct and Part One of KCSIE to new employee	✓		HR Dept.