



Safer Recruitment Policy

Date of Review Reviewed By Date of Next Review	September 2024 Kim Carwardine + Kath Barclay September 2025
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Statement of intent

Bridge the Gap Malvern has implemented this policy to assist with recruitment and employee selection. It outlines the centre's recruitment procedure and how the centre ensures safer recruitment is considered at all levels of the recruitment process.

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



Legal framework

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

- Rehabilitation of Offenders Act 1974, exceptions Order 1975 and subsequent amendments
- Children Act 1989
- Education Act 2002
- Sexual Offences Act 2003
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- Education and Skills Act 2008
- The School Staffing (England) Regulations 2009
- Equality Act 2010
- The UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Amendments to the Exceptions Order 1975, 2013 and 2020
- This policy has due regard to guidance including, but not limited to, the following:
 - DfE (2021) 'Staffing and employment advice for schools'
 - DfE (2022) 'ID checking guidelines for standard/enhanced DBS check applications from 1 July 2021'
 - DfE (2021) 'Right to work checks: employing EU, EEA and Swiss citizens'
 - DfE (2024) 'Keeping children safe in education'
 - Disclosure & Barring Service (2018) 'Regulated activity with children in England'
 - Home Office (2022) 'Employer's guide to right to work checks'
 - Safer Recruitment Consortium (2022) 'Guidance for safer working practice for those working with children and young people in education settings'

This policy operates in conjunction with the following policies:

- Safeguarding Policy
- Complaints Procedures Policy
- Disciplinary Policy and Procedure
- Single Central Record (SCR) Policy
- Work Experience Policy
- Records Management Policy
- Data Protection Policy
- Staff Equality, Equity, Diversity and Inclusion Policy
- Staff ICT and Electronic Devices Policy

Definitions

"Regulated activity" includes:

Being responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising young people if the person is unsupervised, or



providing advice or guidance on physical, emotional or educational wellbeing, or driving a vehicle only for young people.

Working for a limited range of establishments (known as ‘specified places’, which include schools and colleges), or in connection with the purposes of the establishment, with the opportunity for contact with young people, but not including work undertaken by supervised volunteers.

Engaging in intimate or personal care or healthcare or any overnight activity, even if this happens only once.

Regulated activities do not include:

- Paid work in specified places which is occasional and temporary and does not involve teaching or training.
- Supervised activities which are paid in non-specified settings.
- A supervised volunteer who regularly teaches or looks after young people.

“**Teaching role**” refers to a role involving planning and preparing lessons and courses for students; delivering lessons to students; and assessing and reporting on the development, progress and attainment of students. These activities are not teaching work for the purposes of 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 Head of Centre to provide such direction and supervision.

A “**standard DBS**” provides information about convictions, cautions, reprimands and warnings held on the Police National Computer, regardless of whether they are spent under the Rehabilitation of Offenders Act 1974. The law allows for certain old and minor matters to be filtered out.

An “**enhanced DBS**” provides the same information as the standard DBS, plus any additional information, e.g. interviews and allegations, held by the police which a chief officer reasonably believes to be relevant and considers ought to be disclosed.

An “**enhanced DBS with barred list check**” check is required for when people are working or seeking to work in regulated activity with young people. This check allows for additional checks to be made as to whether the person appears on the children’s barred list.

The “**children’s barred list**” is a list maintained by the DBS which covers individuals who are unsuitable to work with children and vulnerable adults. In addition, where an enhanced DBS including a barred list check is obtained, the certificate will also detail whether the candidate is subject to a direction under section 128 of the Education and Skills Act 2008 or section 167A of the Education Act 2002.

A “**section 128 check**” provides for the Secretary of State to direct that a person may be prohibited or restricted from participating in the management of an independent



school (which includes academies and free schools). A person prohibited under section 128 is also disqualified from holding or continuing to hold office as a governor of a maintained school.

“Safer recruitment” is the safeguarding and protection of students 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 young people.

Roles and responsibilities

The Directors are responsible for:

- Agreeing and monitoring effective policies to ensure recruitment at the centre is in accordance with the legislation outlined above.
- 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 centre.
- Appointing an appropriate recruitment panel.
- Ensuring that all recruitment panel members have undertaken unconscious bias training before the selection process begins.
- 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.
- 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 that all members of the recruitment panel are familiar with their obligations with regards to safer recruitment, as set out in KCSIE.
- Monitoring the centre’s SCR to ensure that the necessary vetting checks for employees are carried out.
- Ensuring that equal opportunities are established and implemented throughout the recruitment process.
- Ensuring that the salary of the successful candidate is determined.
- Accommodating the needs of new employees and making reasonable adjustments when necessary.
- Ensuring that the DPO reviews this policy and that any recruitment data that is kept is in accordance with the Records Management Policy.
- Ensuring that they have the skills to carry out effective selection processes, including knowing when and how to request references.
- Establishing a recruitment panel including at least one individual who has completed safer recruitment training within the past five years.

The recruitment panel 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.
- Appropriately delegating responsibility for recruitment to the Head of Centre.
- Ensuring that the interview addresses leadership ability, team working skills, integrity, understanding of the centre's ethos and vision, and why the candidate believes they would be a good fit for the centre.
- Ensuring that the interview addresses safeguarding practices.
- Ensuring that the interview addresses the candidate's motivation, reasons for being interested in joining the centre, and attitude to working with young people.
- Appointing an Appointing Officer who will be responsible for the entire management of the recruitment process.
- Agreeing with the successful candidate when other members of the centre community will be informed about their appointment, including staff members and parents.
- Ensuring that references have been received where requested.
- Ensuring that all references for a shortlisted candidate are obtained prior to interview, properly scrutinised, and that information is not contradictory, unclear, or incomplete, with clarification requested when appropriate.
- Asking previous employers of new staff members whether the individual has been subject to capability procedures in the previous two years.
- Where possible, ensuring that the shortlisting panel and interviewing panel are comprised of the same people.

The Appointing Officer is responsible for:

- Managing the entire recruitment process.
- Sourcing suitable candidates.
- Acting as a point of contact between candidates and the centre.
- Reviewing and scrutinising candidates' applications and identifying any gaps.
- Preparing the recruitment panel to conduct interviews.
- Organising interviews with shortlisted candidates.
- Ensuring the recruitment process is carried out in line with the relevant centre policies.
- Ensuring that the candidate chosen to fill a vacancy is suitable for the role.

The Head of Centre is responsible for:

- Ensuring appropriate checks have been carried out on prospective staff, volunteers, contractors and agency workers working within the centre.
- Ensuring that appropriate supervision of employees and volunteers is organised, and for promoting the safety and wellbeing of students generally and throughout the recruitment process.
- Leading the interview when the candidate is at a lower level.
- Ensuring that the successful candidate receives the appropriate training, e.g. safeguarding and induction.
- Ensuring that all relevant staff members are familiarised with this policy.



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

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

The DPO is responsible for:

- Ensuring that all references are handled in line with the Data Protection Policy and relevant legislation.

The DSO is responsible for:

- Deciding when it is appropriate or necessary to disclose any safeguarding concerns or allegations as part of a reference, in line with KCSIE.
- Discussing with the Head of Centre the suitability of a candidate when a reference has disclosed safeguarding concerns or prior allegations.

Planning, advertising and shortlisting

The job information and associated documents will be published online. The full requirements of the role will be clearly explained, including any employment vetting requirements such as a DBS check.

The recruitment panel will comprise an Appointing Officer (usually the Head of Centre), who is responsible for the management of the entire recruitment process, and at least two other staff, usually the Directors being one of these. The recruitment panel will be an odd number so majority votes can be cast. At least one member of the recruitment panel will have successfully completed up-to-date safer recruitment training. The recruitment panel will create the advertisement.

Once a vacancy has been identified, the centre will allow an appropriate amount of time for planning and structuring the recruitment process.

The Head of Centre 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 candidates, 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.



Ensure that application packs, where relevant, state that candidates must be willing to sign a self-declaration form to obtain information about staff disqualification, in line with the Childcare Act 2006.

Advertising

The centre will consider the following information when advertising for a role within the centre:

- The skills, abilities, experience, attitude and behaviours required for the post
- The safeguarding requirements, including to what extent the role will involve contact with young people and whether the appointed staff member will be engaging in regulated activity

Advertisements will include:

- A statement of the centre's commitment to safeguarding and promoting the welfare of students whilst making clear that safeguarding checks will be undertaken.
- The safeguarding responsibilities of the post as per the job description and person specification.
- Information surrounding whether the post is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020.

Vacancies will be advertised through external media, with due consideration to the centre's Staff Equality, Equity, Diversity and Inclusion Policy, ensuring that the advertisement reaches a wide range of groups.

Advertisements will contain a statement of commitment to ensuring equal rights.

Advertisements will include, or link to, a job description, person specification and detail the closing date. The contact number of the Appointing Officer and details of the application process will be clearly outlined.

The centre may utilise social media for recruitment, and if doing so, will create a social media recruitment strategy to ensure that the advertisement is reaching the right people and is communicating the ethos of the centre effectively.

When an advert receives a response, the recruitment panel will ensure that candidates receive the application form and are directed to relevant policies on the website.

Application forms

Applicants will be reminded in the application form or elsewhere in the information provided to applicants that it is an offence to apply for the role if they are barred from engaging in regulated activity relevant to young people.

The centre will also provide a copy of the Safeguarding Policy and information on employment of ex-offenders in the application pack available on the website.



Applicants will be required to provide the following:

- Personal details, e.g. their current and former names, current address, and national insurance number
- Details of their current or most recent employment, including the reason for leaving
- Full employment history, including explanations for any gaps in their employment
- Qualifications, the awarding body and the date of the award
- Details of references
- A statement of their personal qualities and an explanation of why they meet the person specification to be a suitable candidate for the role
- A declaration form outlining that they are not barred from teaching, or working with children or vulnerable adults

Application forms and relevant policies will be accessible on the centre's website.

The centre will not accept a CV on its own, all candidates will be required to complete an application form. When shortlisting candidates for an interview, all application forms will be considered. Shortlisting criteria will be agreed in advance by the recruitment panel.

Candidates who are shortlisted will meet all the essential aspects of the person specification requirements. The centre 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. Candidates will be assessed against the same shortlisting criteria to ensure a fair process.

The application form will make clear that shortlisted candidates may be subject to online searches.

Shortlisted candidates will be asked to complete a self-declaration of their criminal record or disclosure of any information making them unsuitable to work with young people.

Only those candidates who have been shortlisted will be asked to disclose any relevant information including:

- Information of any criminal offences committed.
- If they are known to the police and children's social care services.
- Whether they have been disqualified from providing childcare.
- Any relevant overseas information.

Applicants will need to sign a declaration which confirms that the information they have provided is true.

When shortlisting candidates, the centre will:



- Ensure that at least two people carry out the shortlisting proceedings – ideally, these two people will also conduct the interview.
- Assess whether there are any inconsistencies or gaps in the candidate’s employment and consider the reasons given for them.
- Consider undertaking online searches, as necessary, and explore any further potential concerns.

Requests for further information from candidates will be replied to promptly. All applications will be contacted to say whether they have been shortlisted or not.

Interviews will be arranged for the shortlisted candidates.

Invitation to interview

Before interview invitations are sent, the recruitment panel will ensure that application packs are sent and include the following:

- A copy of the advertisement
- A comprehensive job description
- A comprehensive person specification
- Any equal rights material, e.g. an equal opportunities statement
- A brief outline of the centre, its values and aims
- Any relevant centre policies, e.g. Safeguarding Policy.

Once a shortlist has been confirmed, the candidates to be invited for interviews will be contacted by the Appointing Officer and suitable interview times will be decided. The recruitment panel will ensure that all shortlisted candidates receive information about the interview arrangements, how they will be conducted, the areas that will be explored and what documents they should bring.

Pre-interview checks

The recruitment panel will complete the necessary pre-interview checks. Pre-interview checks will include the following:

- Requesting **two** references from each shortlisted candidate directly from the referees – where possible, one reference will be obtained relating to the role in which the candidate worked with young people
- Verifying that the candidate has qualifications or experience relevant to the post
- Checking references against application forms and noting down discrepancies or concerns, and following up these concerns with referees
- Checking and, where necessary, following up candidates’ self-declaration forms

Requesting references

Once a candidate, including an internal candidate, has been shortlisted for a position, references will be requested and scrutinised by the recruitment panel. Any concerns will be resolved satisfactorily prior to confirming an appointment. References will always be requested directly from the referee and from a senior person with



appropriate authority, rather than a colleague. The centre's standard request form will always be used to obtain references.

References will be requested in written form from the candidate's current employer – if they are unemployed, verification of their most recent period of employment and reasons for leaving will be obtained from their previous employer. Wherever possible, at least one reference will be from employment through which the candidate worked with young people.

If the applicant has never worked with young people, the centre will ensure that a reference from their current employer is received.

If the candidate is a centre leaver or has not been in work for over two years, a character reference will be requested.

Where a candidate is applying for a role to work with students directly, information about the details of any capability procedures in the previous two years that they may have been subject to, and the reasons for these, will be requested from their current or former employer.

Concerns raised following a candidate's references will be explored further with the referee where appropriate and discussed with the candidate at interview.

Open references, e.g. 'to whom it may concern' testimonials, and unverified information provided by the candidate as part of the application process, will not be relied upon. Electronic references will be checked to ensure that they originate from a legitimate source.

Checking references

References will be checked upon receipt to ensure that all questions have been answered satisfactorily and that information is not contradictory or incomplete. The referee will be contacted to provide further clarification where appropriate, e.g. if some answers are vague or insufficient, or contradictory information has been provided. The reference will be compared for consistency with the information on the candidate's application form. Discrepancies between the reference and the application form will be discussed with the candidate at interview.

Where a reference appears incomplete or other concerns arise, the centre will carry out one of the following actions:

- Call the referee to discuss the reference further
- Email the referee the reference for confirmation of its accuracy

The recruitment panel will ensure that any past disciplinary action or allegations disclosed as part of a reference are considered carefully when assessing the candidate's suitability for the role. If this involves safeguarding or potential safeguarding concerns, the DSO will be consulted to help assess the candidate's suitability.



Before making a decision not to appoint a candidate based on an unsatisfactory reference, the recruitment panel will consider if HR advice is necessary. Once the decision is made, the Head of Centre will record this on the recruitment file as the reason for non-appointment.

All members of staff who provide a reference will be responsible themselves for checking the content to ensure that it only contains factual and verifiable statements. If there is any doubt about whether to include information, caution will be exercised and it will be omitted. Alternatively, advice will be sought from a senior figure, e.g. the Head of Centre or Directors.

Providing references

References will only be provided once written consent has been obtained from the person requesting a reference.

The member of staff providing a reference will follow this policy's procedures and the prospective employer's requests as much as is reasonably possible, e.g. if a pro-forma is provided, they will complete the form. If the reference is not requested in a specific format, the member of staff will decide the most appropriate method, e.g. a pro-forma or a letter-formatted reference.

The Head of Centre will decide in exceptional circumstances if a reference cannot be provided or if certain questions asked by the prospective employer cannot be answered, with HR advice sought when appropriate.

Staff members will make the Head of Centre aware when they have been asked to provide a personal reference, e.g. for a current or former colleague. The staff member will make it clear within the reference that it is a personal one and is not written for or on behalf of the centre. The staff member will use their own paper or an email address unaffiliated with the centre and ensure that the reference is not linked to the centre in any way.

Details of any capability procedures in the previous two years for staff and the reasons for these, will be provided if requested.

If, as part of a settlement agreement, the centre has agreed to provide a reference for a member of staff, the Head of Centre and Directors will ensure it is provided in line with the agreement and this policy. In circumstances where new evidence emerges that indicates information provided in the reference is incorrect, the Head of Centre and Directors will decide if the reference is changed or withdrawn, with legal advice sought where necessary, and will notify the employee of any decision first.

The centre will ensure that any information provided confirms whether they are satisfied with the applicant's suitability to work with young people, and only provide the facts of any substantiated safeguarding concerns or allegations, including a group of low-level concerns about the same individual, that meet the harm threshold.



Any repeated concerns or allegations which do not meet the harm threshold which have been found to be false, unfounded, unsubstantiated, or malicious will not be included in any reference.

Content of references

Basic information will always be expected in references received and provided, e.g. skills, knowledge, duties undertaken, experience working with young people, and personal characteristics, in addition to any information relating to safeguarding. Further relevant comments will be made as much as is reasonably possible in line with the employer's requests, provided they are verifiable and objective, e.g. through appraisals or attendance records.

References will contain only factual and verifiable information and will not include speculation, e.g. about a former employee's suitability for a job, or hearsay. The person providing the reference will ensure all comments have a factual basis and that an impression is not given which is misleadingly positive or negative. Performance issues or concerns which have not been discussed or raised with the employee beforehand will not be mentioned.

All members of staff providing references will be made aware that information provided verbally to the prospective employer is subject to the same duties as written information and will avoid making verbal statements. Where it is necessary or appropriate, verbal information will be provided only in line with this policy's procedures, e.g. all statements must be verifiable and objective.

Previous disciplinary action

The recruitment panel will ensure that any references requested by the centre include a section asking for any past disciplinary action or allegations to be disclosed. Any disclosures will be carefully considered when assessing the candidate's suitability for the role, in line with this policy.

Information from DBS checks will not be included in references provided by the centre. Information regarding criminal offences from other sources will not be included, unless the Head of Centre deems it appropriate and HR advice has been sought.

When providing references, the disclosure of information about past disciplinary action or allegations not relating to safeguarding will be provided where it is deemed appropriate, e.g. it is relevant to the staff member or former staff member's suitability for the role. Information relating to disciplinary action will generally only be disclosed if penalties or sanctions remain in place for the employee.

Allegations which were proven to be false, unsubstantiated or malicious, e.g. relating to misconduct, will not be included in a reference – this includes if it is a history of repeated concerns or allegations which have been found to be false, unsubstantiated or malicious. The member of staff providing the reference will make no comments about their own personal views on the veracity of allegations.



If an allegation exists which has yet to be investigated or an investigation is incomplete, the Head of Centre will seek HR advice, and legal advice where necessary, on what information, if any, should be provided to the prospective employer.

Use of data and confidentiality

Personal data relating to references will be handled in line with the Data Protection Policy. All references will be properly addressed and marked private and confidential. In accordance with the Data Protection Act (2018) and the UK GDPR any personal information will be processed fairly and lawfully, and will be kept safe and secure e.g. in locked, non-portable containers or, for electronic information, password protected. Access will be strictly controlled and limited to those who are entitled to see it as part of their duties.

Information relating to an individual's health and sensitive personal data, e.g. information relating to the individual's ethnicity, religion or trade union membership, will not be disclosed as part of a reference unless 'express consent' has been received from the individual for this purpose.

The person requesting a reference will be offered the opportunity to see it before it is sent, unless the Head of Centre decides this is not appropriate; however, the centre is aware that ultimately, they cannot prevent the person receiving a copy in line with the Data Protection Act. If the person raises comments about the reference before it is sent, the member of staff responsible for the reference will consider the comments and, if they decide to leave it unchanged, record the reason(s) behind their non-agreement.

Online searches on shortlisted candidates

In line with KCSIE, the centre will consider carrying out online searches on shortlisted candidates as part of its due diligence. Online searches solely aim to help identify any incidents or issues that have happened, and are publicly available online, that the centre may want to explore with the applicant at interview.

Online searches will be conducted on shortlisted candidates only, and only where the centre considers this appropriate. The centre will consider any potential risks of online searches, e.g. unlawful discrimination or invasion of privacy, and will ensure staff conducting online searches are clear on the purpose of the search. Shortlisted candidates will be made aware that online searches may be conducted as part of due diligence checks.

Online searches will only examine data that is publicly available. Staff will not 'follow' or submit a friend request to shortlisted candidates on social media platforms to access further details or information.

Online searches will be carried out by an individual who is independent of the recruitment process to minimise the risk of bias or discrimination and to ensure that only relevant information is considered. The person responsible for carrying out online searches will have due regard to Part three of KCSIE.



The online search process may include searching for the candidate by name via search engines and social media platforms.

When carrying out searches of shortlisted candidates' online presence, the centre will look out for indicators of concern, such as:

- Inappropriate behaviour, jokes or language.
- Discriminatory comments.
- Inappropriate images.
- Drug or alcohol misuse.
- Anything that suggests the candidate may not be suitable to work with young people.
- Anything that could harm the reputation of the centre.

Any concerns will be addressed during the interview process. The centre will ensure that candidates are given an opportunity to discuss any concerns raised by the online search.

The interview

During the interview process, candidates will be asked standard questions and their responses will be recorded for ease of comparison by a designated note-taker on the interview panel. Any concerns raised through contact with referees will be discussed with the candidate at this stage. 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 young people. The centre will use a range of selection techniques to identify the most suitable person for the post.

Interview questions seek to:

- Find out what attracted the candidate to the post being applied for and their motivation for working with young people.
- Exploring their skills and asking for examples of experience of working with young people.
- Looking at any gaps in employment or where the candidate has changed employment or location frequently and asking about the reasons for this.
- Seek examples of the candidate's previous experience.

Interviews will also be used to explore the potential areas of concern to determine the applicant's suitability to work with young people.

Areas that may raise concerns and lead to further enquiry include:

- Implication that adults and young people are equal.
- Lack of recognition or understanding of the vulnerability of young people.
- Inappropriate idealisation of young people.
- Inadequate understanding of appropriate boundaries between adults and young people.
- Indicators of negative safeguarding behaviours.
- Attempts to push or overstep boundaries.
- Consistent rule-breaking behaviour.



Candidates shortlisted for interview will be given the opportunity to complete a self-disclosure form before their interview, to give the interview panel time to consider the information provided. Candidates will also be asked to show proof of identification and qualifications at interview – this proof will be viewed and checked by the interview panel.

The candidate will be given the opportunity to discuss any concerns or ask any questions. The process will always comprise a face-to-face interview; however, the recruitment panel may also request that candidates complete at least one relevant practical/written exercise.

After the interview

After the interview has been completed, the recruitment panel will:

- Assess all candidates' performance using the same agreed criteria.
- Ask the successful candidate to provide proof of identification and qualifications for the centre's records, and to complete the DBS check as soon as possible.
- Contact and provide feedback to the unsuccessful candidates – feedback will be verbal and based on evidence of their performance against the person specification for the role.

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.

After choosing a successful candidate, the centre 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.

Any spent or filtered convictions declared on the candidate's self-declaration form, or declared at interview, will not affect the offer of employment if already made; however, the centre will undertake the relevant assessments to determine whether the candidate is suitable to work in the centre.

Remote recruitment

BTGM currently does not operate a policy of interviewing remotely.

Pre-appointment checks

All appointments will be conditional on satisfactory completion of the necessary pre-appointment checks. These checks seek to identify whether there is anything that would make the candidate an unsuitable appointment for working with young people or as a Transition Coordinator.

When appointing new staff, the centre will:



- Verify the candidate's identity, e.g. checking the name and birth date on a birth certificate and verifying any name changes.
- Obtain an enhanced DBS check via the candidate and, for candidates engaging in regulated activity, barred list information.
- Obtain a separate children's barred list check if the individual will start work in regulated activity with young people 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 as appropriate on any individual who has lived or worked outside the UK.
- Verify professional qualifications, as appropriate.
- For those in management, trustee or governor roles, conduct a section 128 check.

The recruitment panel will ensure any candidate employed to carry out teaching work is not subject to a prohibition order or any sanction or restriction imposed (that remains current) by the GTCE before its abolition in March 2012.

The recruitment panel will assess all cases fairly and on an individual basis. Where a decision has been made not to appoint somebody because of their convictions, it will be clearly documented to enable the centre a chance to defend its decision if challenged.

The centre will consider the following when assessing any disclosure information on a DBS certificate:

- The seriousness and relevance to the post which they have applied to
- How long ago the offence occurred
- The country where the offence occurred
- Whether it was a one-off incident or a history of incidents
- The circumstances around and at the time of the incident
- Whether the individual accepted responsibility for what happened
- Whether the offence has been decriminalised

If the centre 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 centre to allow the individual to carry out any form of regulated activity.

Volunteers

BTGM does not currently have volunteers working with students or student data.

Candidates who have lived outside the UK

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, including an enhanced DBS certificate with barred list information for those engaging in regulated activity, even if they have never been to the UK before.

The centre will make any further checks that it deems appropriate so that any relevant events occurring outside the UK can be considered, e.g. obtaining proof of



past teaching conduct for any candidate for a teaching position from the professional regulating authority in the country in which they worked, where available.

If a candidate is unable to provide the correct documentation, they cannot submit a DBS check. This is because the right to work in the UK cannot be established.

Following the UK's exit from the EU, centre and colleges should apply the same approach for any individuals who have lived or worked outside the UK regardless of whether or not it was in an EEA country or the rest of the world.

Agency and third-party staff

Due to the nature of the work with young people, BTGM do not employ agency or third party staff.

Existing staff

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.

Where an existing member of staff is moving to regulated activity, the recruitment panel will carry out further checks where there is a concern about a member of staff's suitability to work with children. An investigation will be carried out to gather enough evidence to establish if an allegation has a foundation. The employer of the centre will ensure they have sufficient information to meet the relevant referral duty criteria, as outlined in the DBS's barring referral guidance.

The centre 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.

Referrals to the DBS will be made on conclusion of an investigation where an individual has been removed from regulated activity. Referrals to the DBS will be made as soon as possible after the resignation, removal or redeployment of the staff member.

Contractors

The centre 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). 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. 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.

The centre will set out its safeguarding requirements in the contract between the contractor's organisation and the centre.

If a contractor is self-employed, the centre 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. The centre will always check the identity of contractors and their staff on arrival.

Adults who supervise students on work experience

If the centre is organising work experience placements, it will ensure that the placement provider has policies and procedures in place to protect children from harm. More information related to checks on work experience providers is outlined in the centre's Work Experience Policy.

Right to work checks

EU, EEA, or Swiss citizens need to provide evidence of lawful immigration status in the UK. Individuals from these areas will not be able to use their passport or national ID as proof of right to work. BTGM will need to check candidate's right to work online. The UK operates a points-based immigration system which affects how schools employ teachers who are not UK or Irish nationals. All overseas nationals, including those from the EEA and Switzerland, arriving in the UK from 1 January 2021 come under the new system.

The centre will obtain evidence that all candidates for a position have the right to work in the UK by either conducting a manual document-based check, or by using the government's [online portal](#). This will be done before a candidate is offered a position. When conducting a manual, document-based check, the centre will ensure that the documents received from candidates are acceptable in line with government guidance, and from the appropriate list: [List A](#) for candidates with a permanent right to work in the UK, or [List B](#) for candidates with a temporary right to work in the UK. Checks on documents will be conducted in line with [section 19](#) of this policy.

The centre will obtain proof of candidates' immigration status in the UK.

The centre will contact the Home Office in the event that a statutory excuse must be established in the following circumstances:

- The candidate provides a document confirming receipt of an application to EUSS on or before 30 June 2021
- The candidate provides a non-digital certificate of application confirming receipt of an application to the EUSS on or after 1 July 2021
- The centre has checked a digital certificate of application and has been directed to the Home Office's Employer Checking Service
- The candidate provides an Application Registration Card stating the holder is permitted to undertake the work in question



- The centre is satisfied it has not been provided with any acceptable documents because the candidate has an outstanding application with the Home Office made before their previous permission expired, or has an appeal or review pending against the Home Office's decision and cannot provide evidence of their right to work as a result
- The centre considers that it has not been provided with any acceptable documents, but the person presents other information indicating they are a long-term resident of the UK, i.e. having arrived before 1988.

The centre will not make assumptions about a person's right to work in the UK, or their immigration status, on the basis of their race, ethnicity, nationality, length of residence in the UK or background. All candidates, including British citizens, will have their right to work in the UK checked.

Where a candidate's right to work is time-limited, the centre will conduct a follow-up check in advance of its expiry.

The centre may use a certified digital identity service provider (IDSP) to conduct right to work checks on candidates.

Identification checking process

When checking the validity of identifying documents, the centre will ensure that this is done in the presence of the holder. In both cases, the centre will be in physical possession of the original documents. The centre will only accept valid, current and original documentation in its physical form. The centre will not accept photocopies or documentation printed from the internet, e.g. internet bank statements.

The centre will request documents with photographic identity, such as a passport, and compare this against the candidate's likeness. The centre will not accept documents that are not in the candidate's current name as recorded on the application form.

The centre will ensure that the candidate declares all previous name changes and provides documentary evidence to support the name change. If the candidate is unable to provide evidence to support the name change, the centre will hold a discussion with the candidate about the reasons why. The centre will always aim to check the name on the candidate's birth certificate in order to validate their identity. The centre will compare the candidate's address history with any other information the candidate has provided, such as their CV.

The centre will ensure that all letters and statements provided by the candidate are recent e.g. within a three-month period.

The centre will keep a dated record of every document that has been checked for the duration of the candidate's employment and for a further two years after they have left the centre. This will be either as a hard copy or in a scanned format which cannot be manually altered, e.g. JPEG or PDF document, and will be made available to the appropriate authorities if and when requested.



In line with the UK GDPR and Data Protection Act 2018, the centre will only retain copies of DBS certificates where there is a valid reason for doing so, and only for as long as is needed to consider the information provided – this will not be for longer than six months.

When information is destroyed, the centre may keep a record of the fact that vetting was carried out, the result of this vetting, and the recruitment decision taken. The centre may use a certified digital IDSP to secure DBS checks on candidates.

After the pre-appointment checks

Once the pre-employment checks have been completed, the recruitment panel will:

- Agree a start date with the candidate.
- Destroy the completed self-declaration forms.
- 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.
- Add the required details of the checks carried out to the centre's SCR.

Single central record (SCR)

The centre will maintain and regularly update the SCR. All new employees will be added to the record, which will include:

- All staff (including supply staff) who work at the centre.
- All others who work in regular contact with young people in the centre, including volunteers.

Safer recruitment training

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

As a measure of good practice, the centre will ensure that this training is renewed every two years.

Staff and Directors involved in the recruitment process will have an awareness of information regarding the following:

- The recruitment and selection process
- Pre-appointment and vetting checks, regulated activity and recording of information
- Other checks that may be necessary for, staff, volunteers and others
- How to ensure the ongoing safeguarding of young people and legal reporting duties on employers

Safeguarding

For references provided to the centre, the candidate's suitability will always be assessed with particular regard paid to their suitability to work with young people and vulnerable adults. The DSO will be consulted where appropriate.



The DSO will recognise the centre's duty to disclose safeguarding concerns overrides any other duties to an employee, and ensure the centre complies with its safeguarding obligations. The DSO will ensure records are kept of all allegations against staff in line with the most up-to-date version of KCSIE.

For all safeguarding allegations, excluding those proven to be malicious, a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken, and decisions reached, will be kept on the confidential personnel file of the accused member of staff. Accurate information based on these records will be given in response to future requests for a reference, where appropriate. Safeguarding information will not be given in circumstances where the allegation was found to be false, unsubstantiated or malicious – this includes if it is a history of repeated concerns or allegations which have been found to be false, unsubstantiated or malicious. The member of staff providing the reference will make no comments about their own personal views on the veracity of allegations.

Monitoring and review

This policy is reviewed annually by the Directors and the Head of Centre.

Any changes made to this policy will be communicated to all members of staff and relevant stakeholders.

All members of staff are required to familiarise themselves with all processes and procedures outlined in this policy as part of their induction programme.

The next scheduled review date for this policy is September 2025.