



WESTBOURNE
SCHOOL

SCP3 Safer recruitment and selection policy

| | | | |
|-----------------------|----------------|---------------------|--|
| Date reviewed: | September 2019 | Policy: | Safer recruitment and selection policy |
| Review due: | September 2020 | Reviewed by: | NFA Group |

Safer Recruitment and Selection Policy

1. Introduction

- 1.1 Definition – ‘Divisional recruitment lead’ refers to the person who administers and manages the recruitment process, on behalf of the recruiting manager and the accountable individual, for the vacancy being recruited. In Education, this is the Headteacher/Principal, Registered Managers for Fostering and Residential and all Central roles should be signed off by the head of department.
- 1.2 The recruitment and selection of National Fostering Agency Group (NFA Group) employees, workers and contractors is central to achieving a high quality of service, care and education.
- 1.3 This policy covers all companies in the NFA Group, including but not limited to, Acorn Care and Education, Pathway Care Residential, all fostering agencies and central functions.
- 1.4 The NFA Group is committed to safeguarding and promoting the welfare of children and vulnerable people and expects all employees, workers and volunteers to share this commitment. The NFA Group recognises the vulnerability of the children and vulnerable people in its care, and in the care of those who we train and support, and is committed to operating to the highest standards when recruiting. The Group is wholly committed to recruitment and selection procedures that help to deter, reject or identify people who might abuse or cause harm to children or are otherwise unsuited to work with them.
- 1.5 The NFA Group operates a non-discriminatory, fair and objective recruitment and selection process. In line with the Equal Opportunities Policy, all applicants will receive equal treatment and access to opportunities, irrespective of sex, age, sexual orientation, race, ethnic origin, religion or belief, disability, membership or non-membership of a Trade Union.
- 1.6 It is the responsibility of the hiring manager to consider any conflicts of interest and safeguarding risks as a result of existing personal relationships between anyone currently within the team and candidates applying to vacancies. Steps must be taken by the hiring manager to ensure an objective and transparent recruitment process is conducted. The hiring manager should seek advice from HR if there is any concern about a conflict of interest, safeguarding risks and/or a lack of transparency in the recruitment process.

2. Scope

- 2.1 This policy applies to everyone who works for the NFA Group as an employee or a worker, whether they are employed, self-employed, or a contractor. This includes, but is not limited to, bank workers, panel members, freelance assessors and sessional support workers. The policy also applies to the recruitment of agency workers and contractors, working on our sites and employed by a third party.

3. Safer Recruitment

3.1 The NFA Group is dedicated to safeguarding children, young people and vulnerable people and therefore safer recruitment processes are at the heart of this policy in order to identify, deter and reject unsuitable candidates. It is the responsibility of every recruiting employee to conduct themselves in a manner that champions the spirit of the Bichard Enquiry Report 2004: 'For those agencies whose job it is to protect children and vulnerable people, the harsh reality is that if a sufficiently devious person is determined to seek out opportunities to work their evil, no one can guarantee that they will be stopped. Our task is to make it as difficult as possible for them to succeed...' [p.12, para 79 - <http://dera.ioe.ac.uk/6394/1/report.pdf>]

3.2 This procedure and related guidelines have been produced with reference to the DfE publication 'Keeping Children Safe in Education' (KCSIE September 2019) related obligations under the Childcare Act 2006, Fostering Services: National Minimum Standards, the Guide to Children's Homes Regulations, CQC, Independent School Standards, Residential Special Schools National Minimum Standards 2015, the Scottish Social Services Council (SSSC) 'Safer Recruitment Through Better Recruitment' report (November 2016) and current employment legislation. Where possible, taking into account the above, this procedure complies with the Equality Act 2010.

4. Approval to Recruit

4.1 All vacancies must be submitted for approval through the designated applicant tracking system. The approval chain includes the Division head, a designated finance lead, and the HR Director or Group CEO depending on the seniority of the role.

4.2 No recruitment activity should take place prior to vacancy approval.

5. The Recruitment Process

5.1 The hiring manager will consider carefully the skills, knowledge and experience the successful candidate will need to demonstrate, and whether there are any particular matters that need to be included in the job description and job advertisement for the post in order to attract suitable candidates. The information for candidates will set out clearly the extent of the relationships/contact with children and young people, and the degree of responsibility for children and vulnerable people that the appointed person will have.

5.2 The Job Description will be revised where appropriate in consultation with HR to include the required skills, knowledge and experience, as well as the essential and desirable criteria. The Job Description will make reference to the responsibility for safeguarding and promoting the welfare of children/young people and will include a person specification making specific reference to suitability to work with children and young people.

5.3 The NFA Group's safeguarding statement, as outlined below, must be added to the bottom of both the advert copy and the job description: 'The NFA Group / Acorn Care and Education is committed to safeguarding and promoting the welfare of the children and vulnerable people in our care. Successful applicants will be subject to a Disclosure and Barring Service check.' We expect all employees to understand our Group Safeguarding Policy and undertake training. We will

undertake recruitment checks throughout the recruitment process where permission has been given by candidates.

- 5.4 All jobs will be advertised internally for at least one full week using the internal jobs portal and employees will be notified via email on a weekly basis.
- 5.5 When it is necessary to attract external applicants, jobs will be advertised externally, using the designated applicant tracking system on the relevant careers website and using appropriate external media channels when necessary, dependent on guidance and approval from central HR.
- 5.6 Recruitment agencies will only be used with agreement from HR. An agency will be appointed by HR to source candidates if advertising has failed to source the quantity and quality of candidates required. HR may agree to go direct to agency before advertising a vacancy if the type of role being recruited is known to be a hard to fill job.
- 5.7 An application form must always be used in order to obtain a common set of core data from all applicants. CVs will not be accepted in place of a completed application form but may be submitted alongside.
- 5.8 Incomplete applications should not be accepted and should be returned for completion. Candidates can be considered for interview (shortlisting) on a shortened application but a full application form (including full employment history since mandatory school leaving age and reference details) needs to be submitted before attending the interview so that any anomalies, discrepancies or gaps in employment can be discussed at interview
- 5.9 Every candidate will be asked to complete a voluntary Equal Opportunities Form. This form includes personal demographic data and is collected for monitoring the objectivity of NFA Group recruitment processes. This information is not visible to the hiring manager and other employees responsible for making recruitment decisions.
- 5.10 Reasonable adjustments will be made to accommodate any candidate who makes a request at any stage in the recruitment process.
- 5.11 Shortlisting for interview will be carried out using the Job Description and Application Form. Shortlisting can be conducted using a shortened application form as long as the same form is used for all applicants applying to a vacancy. The shortlisting decision should be recorded on the applicant tracking system.
- 5.12 The full application form should be completed prior to interview, including any gaps in employment history; any gaps or inconsistencies must be explored further during the interview. All candidates need to provide full employment history since mandatory school leaving age.
- 5.13 For education appointments, including but not limited to Teaching Assistants, Teachers and Senior Leadership Team, references should be sought on all short-listed candidates before interview, so that any issues of concern they raise can be explored further with the referee and taken up with the candidate at interview. In exceptional circumstances we may be unable to approach a candidate's references prior to the interview if the candidate has withheld permission to do so using the applicant tracking system. All references must be sought and verified before the candidate begins employment.

- 5.14 All candidates must be interviewed in person at least once. The interview assesses the candidate's suitability to work with children and young people. The interview panel should consist of at least two people, one of whom must have been trained in Safer Recruitment. The minimum standard of safer recruitment training is delivered through an online module.
- 5.15 To ensure fairness and objectivity, all candidates will be assessed at interview against the required skills, attributes, behaviours and experience set out in the job description.
- 5.16 Interview questions should be prepared in advance of the interview, should be well structured and the same questions applied for each candidate throughout the interviewing process. A record of the interviewer's assessment of the candidate's response will be recorded on the appropriate applicant tracking system.
- 5.17 Interview questions should test a candidate's attitudes, motives and suitability for this role. At least one question in the interview must be relevant to safeguarding children and young people.
- 5.18 Where practicably possible the NFA Group expects a young person's panel should form part of the assessment for positions with regular contact with children and young people (for example Supervising Social Workers and Teachers). Interview dates should be scheduled as early as possible in the recruitment process in order to include the young person's panel. Care should be taken in order to avoid any potential conflicts between the candidate and young person's panel.
- 5.19 Some roles will require additional testing and assessment. Hiring managers should consult HR for any guidance and assistance designing the assessment and selection process and stages.
- 5.20 The main interview panel must agree on scores and outcomes for all candidates interviewed. All candidates should be informed of the result of the interview and candidate feedback will be provided by a member of the interview panel upon request. Interview forms for all assessed candidates must be kept for 6 months in a secure filing cabinet. Successful candidate interview notes should be stored in their personnel file.
- 5.21 All candidates invited to interview will be asked to bring original documents to confirm the educational and professional qualifications required for the role as specified in the Job Description/Person Specification. The interview panel is responsible for collecting, inspecting and copying the originals at interview. Safer Recruitment requires that each copy obtained is signed to verify the original has been seen using the following format: 'Original seen by [printed panel member name], [panel member signature], [Date]. Copies cannot be obtained over email.
- 5.22 The candidates will also be asked to bring original right to work documents. Right to work documents include EU passport, a Full EU Birth Certificate with proof of National Insurance, or a valid residence permit/Visa stating they are able to work in the UK. You need to check that what you are given is a valid document using <https://www.gov.uk/government/publications/right-to-work-checklist>. The interview panel is responsible for collecting, inspecting and copying the originals at interview. Safer Recruitment requires that each copy obtained is signed to verify the original has been seen using the following format: 'Original seen by [printed panel member name], [panel member signature], [Date]. Copies cannot be obtained over email.
- 5.23 Candidates should also bring evidence of a current DBS / Disclosure Scotland check / Access NI along with 3 proof of identification documents for their DBS application, at least one must be photo ID and one letter showing their current home address. The interview panel must copy, sign and verify the documents, ensuring the photo ID looks like the candidate using the following format "True likeness to candidate and original seen by [printed panel member name], [panel

member signature], [Date].” (<https://www.gov.uk/guidance/documents-the-applicant-must-provide>) Copies cannot be obtained over email.

5.24 The hiring manager is able to make a verbal offer of employment to the successful candidate conditional of successful pre-employment checks. The conditional offer can include a salary within the approved range and the contractual terms signed off at vacancy approval change and templated to the role (including location, hours and benefits).

5.25 All completed and signed interview forms, as well as verified copies of qualifications and identification documents should be sent to the divisional recruitment lead or uploaded to the applicant tracking system to allow for references to be collected and pre-employment checks to be completed prior to commencing the formal offer process.

6. Pre-employment checks

6.1 Unless stated otherwise all pre-employment checks listed below must be completed for all areas of the UK across all divisions. Any offer of appointment made to a successful candidate must be conditional on satisfactory completion of the necessary pre-employment checks, it is unacceptable for any candidate to start without all pre-employment checks completed (see following paragraphs for further detail and clarification):

- Verify the candidate’s identity (see 5.23).
- Verify the individual’s right to work in the UK (see 5.22).
- Obtain (via the applicant) an enhanced DBS/Disclosure Scotland/Access NI certificate (including barred list information, for those who will be engaging in regulated activity) (see 5.23 & 6.2 & 6.3).
- Verify relevant professional qualifications and professional status where required (see 5.21)
- The receipt of at least two satisfactory references, one of which must be the most recent employer. All references must be verified by phone to the referee on a landline phone number confirming the name of person who it was verified with, name of verifier, date and time of verification. This check must always be recorded. (see 8.1)
- Reason for leaving previous roles where they have worked in care obtained from their previous employer (see 8.5)
- A Medical Questionnaire fully completed by the candidate (6.18)
- For all roles within an education setting check for a teacher prohibition order (see 6.12)
- For all middle management and senior roles in education settings, and roles within the school governance hierarchy an additional check is required to ensure the individual is not prohibited under section 128 provisions (see 6.15)
- For all roles within the Fostering, Residential and Education Divisions A satisfactory overseas check is needed for individuals who have lived or worked outside the UK in the last 10 years. (see 6.10)

All new starter files need to be signed off by the accountable individual to confirm pre-employment checks are complete and satisfactory.

- Education - Headteacher/Principal
- Fostering - Registered Manager

- Residential - Registered Manager
- Central roles - Department Head

6.2 The Group will adhere to its mandatory responsibility to secure a security certificate from DBS (England & Wales), Disclosure Scotland, or Access NI (Northern Ireland) for all new employees before their appointment. DBS checks will be renewed every three years. If a candidate is on the update service it is their own responsibility to ensure this is renewed annually. It is the responsibility of the divisional recruitment lead to check every three years that the employee holds a valid DBS. It is the responsibility of the employee to alert their divisional recruitment lead if there should be any changes with the status of their DBS.

6.3 For self-employed contractors, it is the contractor's responsibility to secure and provide a valid DBS and Overseas Check as appropriate before they complete any work for the Group. This needs to be signed, copied and verified by the divisional recruitment lead. In circumstances where a contractor does not already hold a valid DBS the divisional recruitment lead will process this on their behalf.

6.4 All employees based in England and Wales will be encouraged to register for the DBS update service. See <https://www.gov.uk/government/collections/dbs-update-servicepromotional-material> for further information. The cost of this can be reclaimed from the company (Please see the expenses policy for more information)

6.5 The level of check required will depend on the role and duties of the role. A base level security check is required for every employee and agency worker/contractor.

6.6 An enhanced check certificate is required for all employees and agency workers/contractors who have an opportunity for regular contact with children and vulnerable adults but are not engaging in regulated activity.

6.7 An enhanced check certificate, which includes barred list information, will be required for those engaging in regulated activity. The barred list check must be carried out using the correct category (children and/or adult) dependent on the role and level of contact with children and vulnerable adults. This covers the majority of the NFA Group, as outlined in the following definition of regulated activity.

6.8 Regulated activity includes:

- a) Teaching, training, instructing, caring for (see (c) below) or supervising children if the person is unsupervised, or providing advice or guidance on physical, emotional or educational well-being, or driving a vehicle only for children;
- b) Work for a limited range of establishments (known as 'specified places', which include schools and colleges), with the opportunity for contact with children, but not including work done by supervised volunteers.

Work under (a) or (b) is regulated activity only if done regularly. Some activities are always regulated activities, regardless of frequency or whether they are supervised or not. This includes:

- c) relevant personal care, or health care provided by or provided under the supervision of a health care professional:

- personal care includes helping a child with eating and drinking for reasons of illness or disability or in connection with toileting, washing, bathing and dressing for reasons of age, illness or disability;
- health care means care for children provided by, or under the direction or supervision of, a regulated health care professional.

(see 'Keeping children safe in education (2019)' for more detail on regulated activity in schools in England)

6.9 All social work positions are subject to a registration check with the relevant council: England (Health & Care Professions Council), Wales (Care Council Wales), Scotland (Scottish Social Services Council), and Northern Ireland (Northern Ireland Social Care Council).

6.10 For candidates who have lived or worked outside of the UK at any point you must take a risk based approach in asking the candidate to provide Overseas Criminal Records checks, this must always include the last 10 years as a minimum. If they were in a country for more than three months you can consider this as living there rather than visiting. As well as these additional overseas checks the candidate should undergo the same checks as all other candidates. The overseas checks must include:

- A check of information about any teacher sanction or restriction that an EEA (European Economic Area) professional regulating authority has imposed, using the NCTL Teacher Services' system (<https://teacherservices.education.gov.uk/>). Although restrictions imposed by another EEA regulating authority do not prevent a person from taking up teaching positions in England, schools and colleges should consider the circumstances that led to the restriction or sanction being imposed when considering a candidate's suitability for employment.
- An overseas criminal records check. The home office has published guidance on criminal record checks for overseas applicants. You will find here information on who to contact and how to contact them for every country: <https://www.gov.uk/government/publications/criminal-records-checks-for-overseasapplicants>

6.11 For candidates with refugee status you should attempt to contact the relevant police force to confirm that gaining a police check from the country is not possible. If no overseas police check is available, then additional references should be sought above and beyond the required two. The Assistant Director of Education/Regional Operations Directors, along with the accountable individual should be given sight of the complete file of pre-employment checks. If they are satisfied there is no risk to recruiting the candidate, then the file should be signed off and we can proceed to hire the candidate. If you are unable to seek and verify references you must not appoint.

6.12 For all appointments in the Education Division it is also necessary to check the individual is not prohibited from teaching. This check required for all non-teaching roles, as well as teaching roles, because of the high level of access to children in the nonteaching roles and the potential for future internal progression into a teaching role.

6.13 Teaching prohibition orders prevent a person from carrying out teaching work in schools, sixth form colleges, 16 to 19 academies, relevant youth accommodation and children's homes in England. A check of any prohibition can be carried out using the 'Teacher Services' system' (<https://teacherservices.education.gov.uk/>). Prohibition orders are described in the National College for Teaching and Leadership's (NCTL) publication 'Teacher misconduct: the prohibition of teachers'. This needs to be carried out for all roles within an education setting.

- 6.14 For all teaching roles we need to verify the candidate's qualified teacher status and the completion of teacher induction or teacher probation. This can be done using the 'Teacher Services' webpage for England (<https://teacherservices.education.gov.uk/>). For Scotland this can be done using General Teaching Council for Scotland (<https://gtcs.org.uk>). For Wales all education qualifications can be checked using Education Workforce Council (<https://www.ewc.wales>).
- 6.15 For all Education management (including middle management) and senior management roles, (including group roles outside of the school structure, including: governors/ any teaching positions on the senior leadership team, and any teaching positions which carry a department headship) an additional check is required to ensure the individual is not prohibited under section 128 provisions. A section 128 direction prohibits or restricts a person from taking part in the management of an independent school, including academies and free schools. Where the individual will be engaging in regulated activity, a DBS barred list check will also identify any section 128 direction. So, a separate check for a section 128 direction is only required for management positions in our schools where the individual is not engaging in regulated activity and is not subject to a barred list check. A check for a section 128 direction can be carried out using the 'Teacher Services' system' (see 'Keeping children safe in education (2019)' and 'The Independent Educational Provision in England (Prohibition on Participation in Management) Regulations 2014').
- 6.16 On receipt of a candidate's DBS (and other statutory checks) the recruiting manager will review any information that is raised. If there is anything disclosed a Risk Assessment must be completed by the recruiting manager and the operational 'accountable individual' for recruitment on site (as defined in the table at the end of this policy) to determine whether to appoint or withdraw the offer. HR should be consulted before a decision is made on whether to hire the individual. The risk assessment proforma is held by the operational 'accountable individual' and HR are able to provide advice and guidance. The risk assessment must be kept on the individual's file.
- 6.17 In respect of contractors/agency staff supplied by a third party, the recruiting manager must obtain written notification from the third-party confirming they have carried out all the pre-employment checks that would normally be conducted internally (as set out in this policy). On the temporary worker's start date the manager must check that the person presenting themselves for work is the same person on whom the checks have been made by checking their proof of photo ID on their first day. See section 9 for full guidance on the recruitment of agency staff and contractors.
- 6.18 All employees need to complete a Medical Questionnaire after they have been offered a role. This should be sent to the candidate with their offer pack and completed before a start date is confirmed. If anything is disclosed a Risk Assessment needs to be completed by the Hiring Manager.
- 6.19 All pre-employment checks (see 6.1) must be reviewed by the accountable individual. If anything is disclosed a risk assessment must be completed by the hiring manager and reviewed by the HR Business Partner and a decision made on whether the candidate can be appointed into the role (see 6.16 for more information)
- 6.20 If you intend for an education employee to work within a residential role (on site or aligned to the school) you need to ensure they have all the relevant checks for a residential role completed before completing any shifts within a residential role (e.g. reason for leaving references and relevant DBS)

7. Employment of Persons with Criminal Convictions

- 7.1 The NFA Group is committed to the fair and transparent treatment of all of its employees and job applicants. The importance of equality of opportunity for all is recognised, as are the benefits of having diversity of talent, skills and potential. As such NFA Group welcomes applications from as wide a range of applicants as possible, including those with criminal records.
- 7.2 The existence of a criminal record does not lead to the automatic withdrawal of a conditional offer. A considered and objective decision will be made by the operational lead (i.e. Headteacher, Registered Manager, Head of Department) taking into account the nature of the job vacancy and the background of the offences.
- 7.3 Applicants are asked to declare all ‘unspent’ convictions unless the nature of the position being applied for is exempt as defined in the Rehabilitation of Offenders Act 1974 (Exclusions) (Amendment) Order 2001 and Rehabilitation of Offenders Act (Exclusions and Exceptions) (Scotland) Order 2003 (as amended) and it is a requirement that an entire criminal record (including spent convictions) is declared including spent convictions. This is made clear in the recruitment literature. To clarify, for all roles working in regulated activity we would seek a declaration of all unspent and spent convictions.
- 7.4 A candidate’s failure to disclose any convictions as part of their application could lead to withdrawal of an offer of employment.
- 7.5 At interview an open discussion will take place about the declared convictions to aid the decision-making process. This discussion must be recorded and kept in the individual’s file.
- 7.6 On receipt of a candidate’s DBS (and other statutory checks) the recruiting manager will review any information that is raised. If there is anything disclosed a Risk Assessment must be completed by the recruiting manager and the operational ‘accountable individual’ for recruitment on site (as defined in the table at the end of this policy) to determine whether to appoint or withdraw the offer. HR should be consulted before a decision is made on whether to hire the individual. The risk assessment proforma is held by the operational ‘accountable individual’ and HR are able to provide advice and guidance. The risk assessment must be kept on the individual’s file. (see 6.16 and 6.19 for more information)

8. Employment History and References

- 8.1 All offers of employment will be subject to at least two satisfactory references, one of which must be from their current/most recent employer and should cover a total of three years. The purpose of seeking references is to obtain objective and factual information to support appointment decisions. They should always be sought and obtained directly from the referee, and must always come from a company email address. References should always be verified over the phone (using a landline number) with the referee and a written record maintained. If a second employment reference is unavailable (e.g. recent lengthy gap in employment/ previous company closed) a character reference will be accepted in exceptional circumstances. This must be from ‘a person of good standing in their community’ or work in (or be retired from) a recognised profession

<https://www.gov.uk/countersigning-passport-applications/accepted-occupations-forcountersignatories>)

- 8.2 For internal candidates, references need only be sought for those employees moving divisions, school or fostering agency. For internal candidates moving roles within the same division at least one reference should be obtained from the previous line manager. For internal candidates moving to another division full references must be obtained, including reason for leaving references for positions within Residential and Fostering. Before confirming their start date their file must be audited and signed off by the accountable individual. This is an opportunity to correct any historical omissions and account for any changes in legislation.
- 8.3 For education appointments, including but not limited to Teaching Assistants, Teachers and Senior Leadership Team, references should be sought on all short-listed candidates before interview, so that any issues of concern they raise can be explored further with the referee and taken up with the candidate at interview. In exceptional circumstances we may be unable to approach a candidate's references prior to the interview if the candidate has withheld permission to do so using the applicant tracking system. All references must be sought and verified before the candidate begins employment. (see 5.13)
- 8.4 If a candidate for a teaching post is not currently employed as a teacher a reference should be sought from the school, college or local authority the candidate was most recently employed by.
- 8.5 For all positions within the Fostering & Residential divisions with regular access to children and/or vulnerable adults, where reasonably practical, confirmation of their reason for leaving will be requested from all previous employers where they held a role with duties in a care setting. These must be verified over the phone using a landline number. Evidence that the references have been sought must be saved in the individual's file.
- 8.6 A standard proforma will be used to seek references; in cases where referees prefer to write a letter instead of using the standard proforma, these employment references will be acceptable as long as they are addressed directly. Open references in the form of 'to whom it may concern' testimonials are not acceptable.
- 8.7 References should request details of all disciplinary offences and whether the candidate has been the subject of any child protection allegations or concerns, including the outcome of any enquiry or disciplinary procedure. Details of allegations that have not been substantiated, are false or malicious will not be sought. When neither the candidate's current nor previous employment has involved working with children nor young people, their referees still be asked about their suitability to work with children and young people.
- 8.8 On receipt, references should be checked to ensure that all specific questions have been answered satisfactorily. The referee should be contacted to provide further clarification as appropriate, for example if the answers are vague. They should also be compared for consistency with the information provided by the candidate on their application form. Any discrepancies should be taken up with the candidate.
- 8.9 References should always be obtained and scrutinised with any concerns resolved satisfactorily, before the appointment is confirmed.
- 8.10 The Divisional recruitment lead will keep a record of all detailed checks of staff including identify, qualification requirements, and security checks.

8.11 In respect of contractors/agency staff supplied by a third party, the Divisional recruitment lead should keep a dated record of whether written confirmation has been received from the supplier that the relevant checks have been carried out, the relevant certificates obtained, and whether an enhanced security check certificate has been provided. This record should include the date confirmation was received. See section 9 for full guidance on the recruitment of agency staff and contractors.

8.12 Schools and colleges must keep a single central record, referred to in the regulations (described in the following paragraph) as the register. The single central record must cover the following people: • all staff (including supply staff, and teacher trainees on salaried routes) who work at school. In colleges, this means those providing education to children; and • for independent schools, including academies and free schools, all members of the proprietor body.

The information that must be recorded in respect of staff members (including teacher trainees on salaried routes) is whether the following checks have been carried out or certificates obtained, and the date on which each check was completed/certificate obtained (see above for required checks):

- an identity check
- a barred list check
- an enhanced DBS/Disclosure Scotland/Access NI check/certificate
- a prohibition from teaching check
- a section 128 check
- further checks for those individuals who have lived or worked outside of the UK
- a check of professional qualifications; and
- a check to establish the person's right to work in the UK. For supply staff written confirmation from the recruitment agency that all checks have been carried out must be recorded (9.5)

8.13 Withdrawals of job offers shall be made in writing and shall be made if a candidate does not provide satisfactory references, statutory checks, evidence of relevant qualifications, if it comes to light that false information was included on the application form or during the selection process, or if information was deliberately withheld during the recruitment process.

8.14 All employees will receive a contract of employment, ideally before their start date, but in any event no later than 8 weeks after joining the organisation, in line with the statutory requirement.

8.15 All roles are offered subject to a six-month probation period, with employees being confirmed in post following successful completion of this period, (also see Induction and Probation Policy). The organisation will review an individual's progress during the probationary period and failure to achieve the required standard during this time will lead to the termination of employment.

9. Agency staff and contractors

9.1 In respect of contractors/agency staff supplied by a third party, the Divisional recruitment lead must obtain written notification from the third-party confirming they have carried out all the pre-employment checks that would normally be conducted internally. The written notification must be obtained in advance of the agency worker starting in the role.

- 9.2 Agency candidates cannot move between divisions before ensuring that they have had to correct level of checks for that division.
- 9.3 There must be written confirmation that each required element of the pre-employment checks has been completed and all required references have been received and verified.
- 9.4 All qualifications and training required for the role must be confirmed with dates of attainment and renewal recorded where necessary.
- 9.5 On the temporary worker's start date the manager must check that the person presenting themselves for work is the same person on whom the checks have been made. 9.6 In education settings the written confirmation from the supplier must be held on the single central record. This includes confirming that the worker holds the relevant checks and the appropriate certificates, and the date that confirmation was received and whether any enhanced DBS certificate check has been provided in respect of the member of staff.
- 9.7 Contractors working directly for the NFA Group (self-employed basis) are subject to the same pre-employment checks as a direct employee.

10. Induction

- 10.1 An induction programme will be undertaken by all new colleagues and the hiring manager is responsible for arranging this. Certain elements of the induction will also be applicable to those who are changing roles within the NFA Group.
- 10.2 The content and nature of the induction process will vary according to the role and previous experience of the new colleagues, but as far as safeguarding the individual and promoting the welfare of children is concerned, the induction programme must include information about, and written statements concerning:
- The structure and role of relevant departments and/or services.
 - Policies and procedures in relation to safeguarding and promoting the welfare of children e.g. child protection, anti-bullying, anti-racism, physical intervention/restraint, intimate care, CSC, Radicalisation, FGM, internet safety and any local child protection/safeguarding procedures.
 - Safe practice and the standards of conduct and behaviour expected of staff and pupils/residents in the establishment.
 - Health, Safety and Welfare.
 - How and with whom any concerns about issues should be raised.
 - Other relevant personnel and school/residential home policies and procedures e.g. grievance, disciplinary, capability, absence management, computer usage, dealing with allegations of abuse against staff, and whistle-blowing.

| | |
|---------------------------------------|---|
| Author: | Human Resources |
| Document Title: | Safer Recruitment & Selection Policy |
| Review Date: | Reviewed annually. Updated as required. |
| Approval: | NFA Executive Group – 6th February 2018 NFA Group Safeguarding & Quality Committee – 8th February 2018 October 2018 & September 2019 Amendments approved by HR Director and Director of Compliance & Quality |
| Executive Officer Responsible: | Group HR Director & Group Compliance & Quality Director |
| Accountable Individuals: | Responsible individuals and registered managers for children’s homes Nominated individuals for adult homes Registered Manager for fostering offices Headteacher or Principal for education settings Head of Division for HQ |

List of Policy Amendments made for September 2019 (Updated from October 2018 version)

| | |
|------|---|
| 1.6 | Reference to personal relationships between hiring managers and other staff in the workplace. |
| 6.2 | Clarity on how often to check DBS |
| 6.14 | Information added on how to check Teacher Qualifications for candidates who have qualified in Scotland or Wales |
| 6.16 | Detail added on Risk Assessments |
| 6.18 | Detail added on Medical Questionnaire |
| 6.19 | Clarity on what to do if anything is disclosed throughout the pre-employment checking process |
| 6.20 | Clarification of process for employees moving between divisions |
| 8.2 | Clarity on what references are needed for internal candidates |
| 9.2 | Clarity on moving agency candidates between divisions. |