

## **Safer Recruitment Policy and Procedure**

### **The scope of this policy**

This policy relates to all the recruitment of all administrative roles in our schools which take students aged under 18, and any teaching, leisure, interns and duty/maintenance roles and homestay providers who may have unsupervised contact with under 18s.

### **The aim of this policy**

OISE Ltd is committed to safeguarding its students aged under 18 and is invested in promoting their welfare. The aim of this Safer Recruitment Policy is to deter unsuitable applicants from applying for roles working with Under 18s in our schools, to carry out an appropriate and suitable recruitment and selection process, to make sure the right pre-employment checks are in place and the details are securely and confidentially recorded, that all candidates are treated fairly, consistently and in compliance with all relevant legislation and that the right training and information is in place from the outset to make sure that the welfare of the under 18s is paramount.

#### **1. Training for recruiters**

Where staff are recruiting for a role as above, within the scope of this policy, at least one person on the recruitment panel must be trained in Safer Recruitment. This will usually be the school DSL or Deputy DSL. If no one is currently trained in safer recruitment, then a safer recruitment trained member of staff from another school or location should be involved in the recruitment process to give a safer recruitment perspective.

#### **2. Job advertisement, application form and job description**

Any roles as above must be advertised as subject to a DBS check and schools may also wish to add wording on the advertisement which reiterates their commitment to safer recruitment right from the outset of the recruitment process. This is to deter any unsuitable applicants and to demonstrate the strength of our culture of safeguarding and child protection in our organisation. This information should be clearly written on the job description along with the need to uphold our company safeguarding policy at all times.

#### **3. Interview process**

During the interview and selection process questions must be asked to determine any inappropriate intentions and/or history of the applicant. All gaps on their CV must be followed up by questions to the applicant directly. Any information shared in this way should be noted confidentially and discussed with the School DSL and the Group DSL in order to make a recruitment decision.

#### **4. References**

References must be taken up and the referees should be asked specifically if they are aware of any reason why the applicant should not work with children. Any information shared in this way should be noted confidentially and discussed with the School DSL and the Group DSL in order to make a recruitment decision. The Group DSL can decide whether this information should be shared with the DBS or other bodies in line with safeguarding responsibilities.

#### **5. DBS checks**

We use uCheck to perform 'Enhanced' DBS checks in our schools. This is currently done centrally by our HR Department (hr@oise.com). Enhanced DBS checks are required for all those in regulated activity.

N.B. The term 'Regulated activity' applies to teaching, caring for or supervising children (and some other related activities such as driving vehicles). We must check that a person engaging in regulated activity is not barred from doing so before s/he begins work.

We should only arrange a check on a successful job applicant, and only then with their express consent. (For example, our Offer Letter.) To this end, all job offers must be worded 'subject to receipt of a satisfactory DBS check'.

We require a new check on every applicant. A DBS check done by another organisation is not acceptable, unless

- (a) the applicant is a member of the Update Scheme (see below), or
- (b) we have applied for a new check and are awaiting its return (see below).

A person can start work before their DBS has arrived, as long as they do not engage in regulated activity, i.e. make sure they are always supervised and never have open access to children

The DBS certificate is now sent only to the candidate; therefore the employer has to see it. No DBS certificates or copies of certificates should be kept on record by the employer. The original must be brought in and seen, and a record kept of the name, number and date of the certificate, the outcome of the check and the name of the person who saw the certificate and the date seen.

For more information on DBS checks: [www.gov.uk/disclosure-barring-service-check/overview](http://www.gov.uk/disclosure-barring-service-check/overview)

#### **6. DBS Update Service**

If applicants subscribe to the DBS Update Service, this can avoid the need for a new DBS check [www.gov.uk/dbs-update-service](http://www.gov.uk/dbs-update-service). However, we must make sure that the original DBS check was an enhanced check and was carried out for an equivalent activity, i.e. working with children in a similar 'Child Workforce' role. An 'Adult Workforce' role or a basic check will not meet our needs.

The original certificate must be seen, a note taken of the certificate number and the applicant's name and date of birth as it appears on the certificate, and then the applicant must give consent for you to log into the employers' update service check site where these data is entered and any new information received since the certificate was processed will be revealed.

## **7. DBS checks for homestay providers**

All homestay providers who take under-18s must have an Enhanced DBS check. We must check all adults in the homestay, not just the main carer.

There are 2 ways of doing this:

- a) Every adult who is resident at the address or who will be present at the address when the homestay takes place (inc, e.g. adult children) has a separate DBS or
- b) A uCheck section is completed for Home Based Provision if all adults present during the homestay are normally resident at that address.

- The main carer applies and we answer 'Yes' to a question asking if the regulated activity takes place in their home (Home Based Provision) on uCheck.
- When answering yes to this question, the local police look at the address and are at liberty to give information about every adult resident at the applicant's address and also any adults who are closely associated with the address if the police feel it affects the suitability of the home to host under 18s. Most likely they will respond by telling employer to get separate DBS check on person X.
- NB: separate checks on each individual adult may be required by local authorities for private fostering

There are some drawbacks with this method:

- The applicant's name will receive all the DBS feedback, so if somebody in the home (or closely associated with it) has a criminal past, it could appear on the applicant's DBS certificate
- The applicant can join the Update Service; however, only they will be updated, not all the other adults living at or associated with the address. Therefore, their DBS would need to be periodically renewed (annually would be better than every 3 years).

All of the above information must be explained to the applicant at the time of the DBS check. We can ask them to complete a form with the names and regular addresses of all adults (over 18) who will be present at their house at the time of the homestay and explain what checks will need to be done.

## **8. Barred List**

If an Enhanced DBS with list check has not come back before a candidate is due to start work, the employer must check that the candidate is not on the barred list.

- An email address for applying to access the Barred List is available at [www.teacherspensions.co.uk/employers/training-and-resources/references/tp-online.aspx](http://www.teacherspensions.co.uk/employers/training-and-resources/references/tp-online.aspx)

## **9. DBS-pending risk assessment**

Staff need a satisfactory DBS check before starting work at schools which take under 18s. However, in exceptional circumstances, while the school awaits the return of a DBS application, a new staff member may be allowed to work in a limited capacity. In this instance, a DBS-pending risk assessment should be completed and the staff member should be accompanied around under 18s, monitored and not given access to any confidential information such as door codes or sensitive personal information about children.

## **10. Overseas Police checks**

If job applicants have lived or worked outside the UK recently, then it is important to make sure we have done our best for safeguarding purposes by checking their record outside the UK as well. You can do this by conducting a police check or criminal record check for the country they have spent time in, if they lived there for 12 months or more, and they were over 18 at the time.

You can find a 'How to' list recommended by the government for checking applicants from each country listed alphabetically at the link at <https://www.gov.uk/government/publications/criminal-records-checks-for-overseas-applicants>

## **11. School Governors**

All School Governors require an Enhanced DBS check (without Barred List, unless they are engaged in regulated activity). They must have their details recorded on the Single Central record.

## **12. Volunteers or other adults involved in the school**

All volunteers or other adults involved in regulated activity at the school require an Enhanced DBS check whether they are employed by us or present in a voluntary or accompanying capacity. This must be explained to them before their role is agreed.

## **13. Agency staff**

If using agency staff, schools must check that the agency carries out suitable pre-recruitment checks including a DBS check and that the person presenting at the school is the one for whom the agency has done recruitment checks, i.e. check their I.D.

## **14. Recruitment of staff with criminal records**

- We have a policy about employing ex-offenders on the HR public folder. See also [www.gov.uk/exoffenders-and-employment](http://www.gov.uk/exoffenders-and-employment) This link also explains about the convictions that can be considered spent and do not have to be disclosed.

- Candidates for roles must be informed that we have a policy on the recruitment of ex-offenders and the policy must be made available to them either as a matter of course during the recruitment process, or on request.

- If a candidate's DBS check shows some past criminal convictions, employers should make a case-by-case judgement on whether to employ the person. There is extensive advice at the British Council Accreditation UK site at [www.britishcouncil.org/education/accreditation/information-centres/care-children](http://www.britishcouncil.org/education/accreditation/information-centres/care-children). The Group DSL and Deputy DSL will discuss and take advice as required before coming to a recruitment decision including speaking to the candidate themselves about the conviction. This recruitment decision and the reasons for it will be communicated to the applicant who will have an opportunity to appeal. All efforts will be made to be mindful of the applicant's mental health and the rehabilitation process.

Please see our Policy on the Recruitment of Ex-offenders for more information.

## **15. Single Central Record (SCR)**

(This must be kept by OFSTED/ ISI inspected schools. British Council consider it best practice.)

The record of all checks made during recruitment need to be kept in one place; usually this is one spreadsheet. This information must be kept securely and confidentially and only made available to the person or people who really need to see it for recruitment purposes. This Single Central Record applies to homestay hosts, group leaders, volunteers, freelancers, school governors or director as well as to employed staff.

It should have columns recording that the following have been done or do not need to be done for safer recruitment purposes.

- Identity – name, address, DoB, ID evidence (photo), evidence of check made and date
- Start date
- Role in organisation
- Qualifications – required, evidence of check and date
- DBS certificate – Enhanced disclosure number, date issued, type, evidence of check and date
- DBS update service accessed (Y/N), if so, date and name of person completing the check
- Barred list check (or part of enhanced DBS) (Y/N) - evidence of check and date
- DBS-pending risk assessment completed (Y/N as necessary)
- Overseas Police check – check required (Y/N), evidence of check and date
- At least 2 references from previous employment

HR has a template SCR for reference if you would like a copy on which to enter your school records.

## **16. Induction and further training**

All new staff fulfilling roles within the scope of this policy will be required to read be familiar with the current Safeguarding and Child Protection Policy and attend training at Level 1 (Basic) Safeguarding. This will be refreshed as required, along with regular school reminders on policy and practice regarding under 18s in the school. The School Lead and DSL will take responsibility for this, seeking advice from the Group DSL as required.

Notices promoting the welfare of under 18s will be displayed in the school where appropriate along with the support available within the school and the wider company and the places where students and adults can go for safeguarding advice and information about any concerns.

For more information please see our Safeguarding and Child Protection Policy.

## **17. Policy review**

This Safer Recruitment Policy and other specific policies in use throughout the organisation are reviewed each year and revised as and when necessary.

This policy was last reviewed in April 2022.

Next review in April 2023.