



Harrison College Ltd

Safer Recruitment Policy

Reviewed: July 2024

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Purpose and Scope

Safer recruitment practices are designed to ensure that the hiring process is fair, transparent, and free from discrimination while also safeguarding vulnerable individuals

This document is intended for all College staff who are responsible for the appointment of staff (on whatever employment basis), volunteers and Directors. It summarises their key responsibilities with regards to the recruitment process (including the recruitment procedures to safeguard children).

This safer recruitment policy is in line with the KCSIE 2024 publication (page 56 – 91) and considers The Education and Training (Welfare of Children) Act 2021, which extended safeguarding provisions to providers of post 16 Education: 16-19 Academies, Special Post-16 institutions and Independent Training Providers.

1. Recruitment – Your Responsibilities

- To ensure that the College meets its commitment to safeguard and promote the welfare of children and make it clear to all applicants that all staff and volunteers are expected to share this commitment.
- To recruit the most suitable person for the role.
- To treat all candidates fairly.
- To ensure the reputation of the College as an employer is enhanced.

The college will ensure that those involved with the recruitment and employment of staff to work with children have received appropriate safer recruitment training. (Part three KCSIE 2024). In each selection process at least one member of the college recruitment team will hold an up-to-date qualification in safer recruitment.

2. Planning the Recruitment Exercise

It is essential that the recruitment exercise is carefully planned, with those involved having clear responsibilities. This will ensure that measures to ensure children are safeguarded are robust with processes in place to prevent discrimination.

A vacancy owner must be appointed for each vacancy, and they will oversee the entire recruitment process for that post. The vacancy owner will be HR, the Principal or their nominated senior leader.

The planning stage should carefully define the job role clearly, including essential and desirable criteria, and ensure these are based on the actual needs of the job

3. Safeguarding Children

Adhering to strict safer recruitment processes is an essential component of safeguarding children. Safer recruitment helps to ensure that the people we hire are suitable for the role and match up with our college expectations, attitudes, and values. The measures described below apply to all staff who apply to work in the College, as all are in a position where children are likely to perceive them as safe and trustworthy adults. This includes staff employed by contractors and volunteers who have frequent unsupervised contact with children.

A rigorous evidence-based selection process is vital if we are to deter, reject and identify applicants who might abuse children or are otherwise unsuited to work with children.

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As stated in the Bichard Inquiry Report (2004) – *‘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’*. In addition to DBS checks it is therefore vital that the College’s Child Protection Policy is fully complied with. The College is fully committed to encouraging a culture where it is safe for children, parents and staff to raise concerns.

The following steps are in place so that we can meet our objective to have a recruitment process that safeguards children.

- All College recruitment literature will confirm our commitment to safeguarding children and refer to the requirement for Enhanced DBS checks.
- Shortlisted candidates should be asked to complete a self-declaration of their criminal record or information that would make them unsuitable to work with children. Self-declaration is subject to Ministry of Justice guidance on the disclosure of criminal records, further information can be found on GOV.UK.
- The College Application Form requires all applicants for teaching posts to confirm their teacher reference number, if they have QTS status and to provide evidence at interview stage.
- All job descriptions will refer to the responsibility for safeguarding children and promoting their welfare.
- All person specifications will include specific reference to suitability to work with children.
- Comprehensive information will be obtained from all applicants and any discrepancies or anomalies will be resolved at interview, as will the reasons for frequent career/job changes and for a move from permanent to supply teaching.
- Independent professional and character references will be obtained which will specifically confirm the candidate’s suitability to work with children and the details of their employment history.
- The recruitment process will always include a face-to-face interview that explores the candidate’s suitability to work with children.
- The successful candidate’s identity will be verified, and their professional qualifications will be checked. Copies will be kept in their personnel file.
- Enhanced DBS checks will be required for all successful candidates.
- Applicants should be asked to sign a declaration confirming the information they have provided is true. Where there is an electronic signature, the shortlisted candidate should physically sign a hard copy of the application at point of interview
- Always speak to HR or the Principal if you have any concerns about a candidate and refer to the College’s Child Protection Policy.

4. Equal Opportunities

The College welcomes job applications from a wide cross section of the community. All staff involved in the recruitment process need to be aware that Government legislation prevents discrimination on the grounds of:

- Race
- Sex
- Gender reassignment
- Marriage and civil partnership
- Disability
- Religion or belief
- Sexual Orientation and gender identity

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- Pregnancy and maternity
- Age

Unlimited damages may be awarded in cases of discrimination.

5. Reasonable Adjustments

The college has a duty to make reasonable adjustments to ensure that people with disabilities can access and participate in work. Prior to interview candidates will be asked if there are any reasonable adjustments or requirements that we need to be aware of.

College will make reasonable adjustments if requested by the candidate, e.g. a dyslexic candidate may require more time to complete a test.

6. Discrimination

Discrimination can occur in various ways.

Direct Discrimination: Treating someone less favourably because of a protected characteristic.

Indirect Discrimination: Applying a provision, criterion, or practice that disadvantages people with a protected characteristic.

Harassment: Unwanted conduct related to a protected characteristic that violates someone's dignity or creates an intimidating, hostile, degrading, humiliating, or offensive environment.

Victimisation: Treating someone unfairly because they have made or supported a complaint about discrimination

7. How to have a robust Recruitment Process that provides Equal Opportunities

- Agree objective criteria at the outset of the selection exercise, e.g. identify the qualifications, skills/experience and competencies required.
- Have an open selection, i.e. that is advertised either internally or externally.
- Ensure decisions and the reasons for them are recorded and are based on the agreed objective criteria.
- Ensure that at least two people are involved at each stage of the decision-making process.
- Do not ask questions on the application form or at interview that may be viewed as discriminatory.
- Ensure Equal Opportunities are monitored, and managers are aware of their responsibilities.
- Treat all candidates with respect.
- Involve Human Resources if you have any concerns and especially if you receive any complaints.

8. Application information Packs

All application packs are issued by College HR who will ensure that literature, job descriptions and application forms are compliant with employment law and the safeguarding procedures (please see Section 3 above). Information packs and adverts will use inclusive language and state Harrison College's commitment to diversity and equality.

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Only applications on a Standard Application Form will be accepted. CV's can be submitted but will not suffice as application evidence or sifting criteria (see 9 below).

The application form will include a statement in the information provided to applicants that it is an offence to apply for the role if the applicant is barred from engaging in regulated activity relevant to children

9. Sifting Application Forms

Make sure you judge the candidates against the objective criteria you have identified and record the reasons for your decisions. Do not make assumptions – you can only judge the candidate on the information they have provided on their application form.

Note any discrepancies in the application form, e.g. gaps in employment history will need to be followed up if the candidate is invited to interview. Make a record of this question and evidence provided on the application form.

10. References

The purpose of seeking references is to allow the college to obtain factual information to support appointment decisions. We shall obtain references before interview, where possible, this allows any concerns raised to be explored further with the referee and taken up with the candidate at interview. Reference requests will ensure specific questions are asked to confirm their suitability to work with children and to confirm their employment history. Therefore, there is a standard reference request form that will be used in all cases and is stored in the HR file.

The college will

- not accept open references e.g. to whom it may concern
- not rely on applicants to obtain their reference
- ensure any references are from the candidate's current employer and have been completed by a senior person with appropriate authority (if the referee is school or college based, the reference should be confirmed by the headteacher/principal as accurate in respect of any disciplinary investigations)
- obtain verification of the individual's most recent relevant period of employment where the applicant is not currently employed
- secure a reference from the relevant employer from the last time the applicant worked with children (if not currently working with children), if the applicant has never worked with children, then ensure a reference from their current employer
- ensure electronic references originate from a legitimate source using official email address, official stamp and letter headed paper where applicable / sent separately to original request email.
- contact referees to clarify content where information is vague or insufficient information is provided
 - compare the information on the application form with that in the reference and take up any discrepancies with the candidate
 - establish the reason for the candidate leaving their current or most recent post, and,
 - ensure any concerns are resolved satisfactorily before appointment is confirmed.

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11. Selection Process

We will use a range of selection techniques to identify the most suitable person for the post. Ensure that all elements of the selection process gather information to test whether people meet the objective criteria that have been identified as required for the role. The selection process will typically involve aptitude tests, in-tray tasks, lesson observations and interviews. For more senior roles psychometric tests may also be used.

12. Interviews

Interviews are an important source of gathering information to predict how the candidate will perform in the role. They are also a key means of supplying the candidates with information as to why they should join the College. Most claims of discrimination relate to the interview element of the selection, so it is essential to structure the interview in advance.

The interview will be used to explore potential areas of concern and to determine the applicant's suitability to work with children. A specific question(s) will be included in the formal interview. Areas that may be concerning and lead to further probing include:

- implication that adults and children are equal
- lack of recognition and/or understanding of the vulnerability of children
- inappropriate idealisation of children
- inadequate understanding of appropriate boundaries between adults and children, and,
- indicators of negative safeguarding behaviours

13. Structured Interviews

Clearly candidates should be made to feel welcome and be given a good idea what to expect in the interview. Candidates should be introduced to the panel, made aware of the likely time of the interview, the areas to be covered, that notes will be taken and that they will have the opportunity to ask questions at the end of the interview.

Question areas should focus on the attributes required to do the role. Question areas should be planned in advance and all candidates should be asked similar questions. However, there will inevitably be differences, e.g. you will wish to discuss with some candidates the reasons for any gaps/discrepancies in their CV, the reasons for frequent moves of job, the reason for moving from a permanent role to a supply teaching role.

An interview question form will be prepared prior to interview and used on all candidates applying for that role. Record down the answers and rate them against the objectives and criteria.

There are certain values, beliefs and characteristics that the College regard as intrinsic to the success of the individual and they must align with our mission and aims. Include questions that explore these. The best way to gather information in these areas is to ask questions regarding:

- a) Character, personality and key qualities they will bring to the team
- b) The challenges they have faced and how they have reacted and overcome them
- c) What are their strengths, key skills and abilities and what do they enjoy doing best at work.
- d) Attitude to SEN, disabilities and equality, inclusivity and individual need
- e) Career development and the impact this has on living fulfilling lives

Evidence must be gathered as to the candidates' suitability for working with children. All candidates must be made aware of the importance of the College's safeguarding policy. Harrison College will

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

Questions can be used to verify the candidate's mental and physical fitness to carry out their work responsibilities. A job applicant can be asked relevant questions about disability and health in order to establish whether they have the physical and mental capacity for the specific role

The evidence provided by candidates should be scored using an agreed rating system.

14. Types of Questions

Standardised interview questions are devised to ensure all candidates are evaluated on the same criteria.

- Only limited use of closed questions should be used, generally they should be used to check information e.g. do you have a GCSE in English?
- Generally open questions such as – what, why, how, tell me about – should be used to encourage the candidates to talk.
- Open questions may be followed up with probing questions to ensure you are getting all the relevant facts, e.g. 'what was your precise role in the project', 'what exactly was your contribution', 'did you prepare the report recommendations in full'.
- Be careful not to give the answer away by asking leading questions, e.g. 'Do you agree with me that...'
- Behavioural questions tend to be best for providing information about how the candidates will behave in the role as past behaviour is the best predictor of how people will behave in the future. An example would be 'tell me about how you dealt with a difficult decision you have had to make'.
- Avoid asking multiple questions that may confuse the candidate.
- Avoid asking questions that could be construed as being biased on the grounds of sex, race, disability, sexual orientation or age etc, e.g. don't ask 'are you planning to have any more children', 'would it worry you being a non-Christian working in this environment'.

Interviewers should all be trained and confident on unconscious bias.

15. Selection Interview Skills

- **Establishing Rapport:** This means putting candidates at their ease, encouraging them to respond and generally being friendly. If you establish rapport candidates are more likely to talk freely about their strengths and weaknesses. When responding to answers be appreciative, e.g. 'Thank you, that was helpful', not, 'well that did not show you in a good light'.
- **Listening:** When interviewing you must concentrate on what the candidates are telling you. If you play back to candidates your understanding of what they have said for them to confirm or amend, it will ensure that you have fully comprehended the message they are delivering. In a good interview the candidate will have done the majority of the talking.
- **Keeping Control:** Let the interview flow but keep to time and the questions at hand.
- **Note Taking:** Inform candidates that you will be taking notes of the key points.
- **Questions:** Give time at the end for the candidate to ask you any questions. Record these down and your answers
- **Checks;** use the time at the end to ask any questions relating to gaps or concerns you have, i.e. gaps in employment, right to work, references given, disclosures, contact details.

- **Safeguarding:** Ensure you have asked about disclosures and have the candidate sign the application form in front of you.

16. When you have selected the Preferred Candidate/s

All offers of appointment will be conditional until satisfactory completion of the mandatory pre-employment checks. These may include but not be limited to

a) **Proof of Identity, DOB and Address**

Proof must be provided of identity such as birth certificate, driving licence or passport before appointment is made. The proof should include name, date of birth, address and photographic identity. Identity checks also apply to staff supplied by agencies or other third parties. Further identification checking guidelines can be found on the GOV.UK website

b) **DBS Checks**

Enhanced DBS checks must be undertaken. It is therefore vital that when the DBS Disclosure request is made it is made clear that the individual will be working with children.

Enhanced DBS check with children's barred list information will be carried out where people are working or seeking to work in regulated activity relating to children, this allows an additional check, to be made, about whether the person appears on the children's barred list, along with a check of the Police National Computer records plus additional information held by the police.

In addition, this check can also include information as to whether an individual is subject to a section 128 direction. A section 128 direction prohibits or restricts an unsuitable individual from participating in the management position of the college or as a director.

We must ensure that an applicant to be employed to carry out teaching work is not subject to a prohibition order issued by the Secretary of State.

The college will use the TRA's Employer Access service to make prohibition, direction, restriction, and children's barred list checks. The service is available via the TRA's web page. <https://teacherservices.education.gov.uk/>

c) **Supply Staff, Volunteers, Governors and Others**

Supply agencies must provide written confirm that all appropriate checks are being undertaken. A copy of DBS Disclosures in cases where information is contained must be provided. The same procedures apply for staff employed by outsourced contractors, e.g. catering, security, etc.

Volunteers and Directors who come into regular unsupervised contact with children should also undertake Enhanced DBS Disclosures, which should include children's barred list information

d) **Visitors, etc**

It is not necessary for DBS Disclosures for visitors who will not be left alone with children, for volunteers who assist with one-off day trips and for contractors who undertake emergency repairs, and students undertaking work experience. Building contractors who have no contact with children do not require DBS checks. However, in all cases Enhanced DBS checks should be undertaken if there is any concern.

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e) DBS Update Service

If using the DBS update service, we will still need to obtain the original physical certificate. Before using the Update Service, we will:

- obtain consent from the individual to carry out an online check to view the status of an existing standard or enhanced DBS check
- confirm the DBS certificate matches the individual's identity
- examine the original certificate to ensure that it is valid for employment with the children's workforce, and,
- ensure that the level of the check is appropriate to the job they are applying for, e.g. enhanced DBS check/enhanced DBS check including with barred list information. Further information about the Update Service, including when updated information can be used, can be found on GOV.UK.

f) Starting Working Pending a DBS

Principals may let staff start working pending a DBS disclosure but must ensure that adequate supervision is in place. It should be made clear to staff that extra supervision is being put in place, who is undertaking the supervision and that the arrangements will be reviewed every 2 weeks until the Disclosure is received. A risk assessment will be carried out and passed to HR for confirmation.

g) Checks on Qualifications

Checks must be made that candidates have any qualifications legally required to undertake the job by seeing the relevant certificate or diploma. Copies of the documents are not acceptable.

The main relevant qualification for teaching staff will be QTS. Copies should be taken of any certificates and placed on the personnel file. The Teaching Regulation Agency's (TRA) Employer Access Service should be used to verify any award of qualified teacher status (QTS), and the completion of teacher induction or probation.

In some circumstances a QTS certificate will not be required to teach e.g. GTP's, Overseas Trained Teachers. For qualifications gained abroad, we will contact the UK Centre for Professional Qualifications who will signpost us to the appropriate EEA regulatory body. A copy should be made and kept in the personnel file of the individual.

h) Reference Checks

References should always be obtained directly from the referee themselves. References will be sought from two employers. Ideally references will be obtained prior to interview. In any event references should be considered and any issues resolved prior to appointment being confirmed. The reference questions must include relationship with candidate (how do they know each other and for how long), does the person meet the requirements of the role, are they completely suitable to work with children (and if not why not). The referee should be reminded that they have responsibility to provide a reference that is accurate and does not contain any material misstatement or omission. The candidate's current employer should be asked to:

- confirm details of current post, (salary and sickness record can only be requested once a candidate has been offered the role)

- comment on performance and conduct
- confirm details of any current disciplinary sanction
- confirm details of any disciplinary procedures the applicant has been subject to, related to the safety and welfare of children or young people, including any in which the disciplinary action has expired
- details of any allegations related to the welfare of children or young people and the outcome of those concerns
- reasons for leaving if no longer with their most recent educational employer

If references are vague or incomplete, they must be followed up. Clearly if an issue was satisfactorily resolved some time ago or an allegation was determined to be unfounded these are not likely to cause concern. However, more serious or recent concerns or issues that were not satisfactorily resolved are more likely to cause concern.

i) **Unsatisfactory DBS Checks**

If any information is uncovered by the Enhanced DBS checks the Principal and the Board of Directors will need to give careful consideration as to whether the offer of employment can continue. Factors to consider will include:

- the seriousness of any offence and relevance to the post applied for
- how long ago the offence occurred
- whether it was a one-off incident or a history of incidents
- the circumstances around the incident,
- What was the applicant's explanation, and have their circumstances changed?
- Was the offence disclosed by the applicant?
- whether the individual accepted responsibility for their actions

j) **Foreign Nationals**

Schools need to ensure that foreign nationals have permission to work in the UK. Harrison College will verify the person's right to work in the UK, including EU nationals. If there is uncertainty about whether an individual needs permission to work in the UK, then schools and colleges should follow advice on the GOV.UK website

In addition, we will make any further checks we think appropriate so that any relevant events that occurred outside the UK can be considered. Following the UK's exit from the EU, Harrison College will 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. These checks could include, where available:

- criminal records check for overseas applicants - Home Office guidance can be found on GOV.UK; and for teaching positions
- obtaining a letter (via the applicant) from the professional regulating authority (this is often the Department/Ministry of Education but varies across the world) in the country (or countries) in which the applicant has worked confirming that they have not imposed any sanctions or restrictions, and or that they are aware of any reason why they may be unsuitable to teach.

Applicants can find contact details of regulatory bodies in the EU/EEA and Switzerland on the Regulated Professions database.

17. Central Record of Recruitment and Vetting Checks

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The College must keep a central record of recruitment and vetting checks. These records should include:

- A full record of all staff who are employed to work at the College providing education
- A full record of all staff who are employed as supply staff to the College
- A full record of all others who have been chosen by the College to work in regular contact with children e.g. volunteers, business mentors, people who provide additional teaching such as sports coaches.

All records will be kept securely on the Single Central Record (SCR) and Staff Safe CPOM's.

Access to DBS information will be limited to only those individuals who need it to make recruitment decisions or manage the individual's employment (HR, Principal or nominated senior leader)

It is permissible to keep a record of the recruitment decision based on the DBS check. This record can include:

- The date of the check.
- The certificate number.
- The decision made (e.g., suitability for the role)

All Staff appointed to the College require an Enhanced DBS Check and once DBS checks have been received, they should be kept for a maximum of 6 months. This period allows for the resolution of any disputes or complaints

The information from a DBS check should be handled in compliance with the Data Protection Act 2018 and the General Data Protection Regulation (GDPR). This means it should be stored securely, accessed only by those who need to see it as part of their duties, and not kept longer than necessary

18. Post Selection Feedback

Provide feedback to unsuccessful candidates, ensuring it is constructive and non-discriminatory.
Keep records of your feedback

Keep all records for up to 3 months as candidates have the right to appeal or take you to court for up to 3 months after the interview date.

By following these guidelines, the College will ensure they handle DBS records responsibly, protecting individuals' privacy while meeting legal and regulatory requirements