

## **SAFER RECRUITMENT POLICY**

### **1. Introduction**

Cornerstone Vocational Training (CVT) has agreed to implement Policy on Safer Recruitment in line with National and Local Government policy. A review will take place by the Senior Management Team (SMT) three yearly.

The purpose of this policy is to set out the minimum requirements of a recruitment process that aims to:

- Attract the best possible candidates to vacancies;
- Deter prospective applicants who are unsuitable for work with children or young people;
- Identify and reject applicants who are unsuitable for work with children and young adults.

### **2. Statutory Requirements**

- 2.1 The policy takes into account the provisions of 'Keeping Children Safe in Education' (DfE Sept 2015).
- 2.2 CVT will ensure that the statutory requirements for the appointment of some staff – notably the SMT – will be met. These requirements change from time to time and must be met.

### **3. Equal Opportunities**

- 3.1. CVT will abide by the existing legislation and, in particular, will not discriminate on the ground of any of the presented characteristics listed in the Equality Act 2010, these being:
  - Age, disability, gender, reassignment, race, religion or belief, sex, sexual orientation, marriage and civil partnership, and pregnancy and maternity.
- 3.2. CVT has an Equality Policy which will be adhered to and links in to values and practices within our centres and makes reference to staff recruitment.
- 3.3. CVT will promote equality in all aspects of our training environments, including in regard to the recruitment of staff.

### **4. Identification of Recruiters**

- 4.1. CVT has five members of staff who have received accredited training in safe recruitment procedures.

They are:

- Peter Roberts (Director)
- Pat Riordan (Sefton/Liverpool Centre Manager) Accredited
- Brendan Bell (Operations Manager) Accredited
- Andy Roberts (Wirral Centre Manager) Accredited
- Mike Davies (Warrington Centre Manager) Accredited

- 4.2. At least one accredited trained member from the above list will form part of the recruiting team.

## **5. Inviting Applications**

- 5.1. Advertisements for posts – whether in newspapers, journals or online – will include the statement:

“CVT is committed to safeguarding children and young people. All post holders are subject to a satisfactory enhanced Disclosure and Barring Service (DBS) check.”

- 5.2. Advertisements for all posts will normally be advertised through a suitable national website/employment service.

- 5.3. In cases where a member of staff is employed but on a fixed term contract for a post which then becomes available as a permanent post, that member of staff may be offered the permanent post without further advertising subject to approval by Peninsula Business Services.

- 5.4. Where staff are invited to take on a management or leadership responsibility for a fixed term in an acting capacity, the acting post will be advertised internally.

- 5.6. Advertisements will specify:

- the main subjects to be taught and/or the nature of any leadership allowance
- whether the post is permanent or fixed term and, in the case of fixed term contracts, the end date of the contract
- the remuneration for the post will be expressed in term of the applicable pay scales,
- the closing date for applications.

## **6. Short-listing and References**

- 6.1. Short-listing of candidates will be against the person specification.

- 6.2. Where possible, references will be taken up before the selection stage, so that any discrepancies can be probed during the selection stage.

- 6.3. References will be sought directly from the referee. References or testimonials provided by the candidate will never be accepted.
- 6.4. Where necessary, referees will be contacted by telephone or email in order to clarify any anomalies or discrepancies. A detailed written note will be kept of all exchanges.
- 6.5. Where necessary, previous employers who have not been named as referees will be contacted in order to clarify any anomalies or discrepancies. A detailed written note will be kept of such exchanges.
- 6.6. Referees will always be asked specific questions about:
  - The candidate's suitability for working with children and young adults;
  - Any disciplinary warnings, including time-expired warnings, that relate to the safeguarding of children;
  - The candidate's suitability for this post.
- 6.7. School employees are entitled to see and receive, if requested, copies of their employment references. This will be dependent on whether the referee has requested that the reference provided remains confidential.

## **7. The Selection Process**

- 7.1. Selection techniques will be determined by the nature and duties of the vacant post, but all vacancies will require an interview of short-listed candidates.
- 7.2. Interviews will always be face-to-face. Telephone interviews may be used at the short-listing stage but will not be a substitute for a face-to-face interview (which may be via visual electronic link).
- 7.3. Candidates will always be required:
  - To explain satisfactorily any gaps in employment;
  - To explain satisfactorily any anomalies or discrepancies in the information available to recruiters;
  - To declare any information that is likely to appear on a DBS check;
  - To demonstrate their capacity to safeguard and protect the welfare of children and young people.

## 8. Employment Checks

### 8.1. All successful applicants are required:

- To provide proof of identity (e.g.: passport or driving licence photocard)
- To complete a DBS application and receive satisfactory clearance
- Have a satisfactory certificate of good conduct relating to time spent living outside of the UK, where applicable
- To provide actual certificates of professional qualifications, as deemed appropriate by CVT
- To provide proof of their right to work in the UK (e.g.: passport)
- To provide proof of their current address (recent utility bill, bank or credit card statement)

### 8.2. Proof of identity, Right to Work in the UK and Verification of Qualifications and/or professional status

All applicants invited to attend an interview at CVT will be required to bring their identification documentation such as passport, birth certificate, driving licence etc. with them as proof of identity/eligibility to work in the UK in accordance with those set out in the Immigration, Asylum and Nationality Act 2006 and DBS Code of Practice Regulations.

In addition, applicants must be able to demonstrate that they have actually obtained any academic or vocational qualification required for the position and claimed in their application form.

### 8.3. Fitness to undertake the role

A confidential pre-employment online health questionnaire must be completed to verify the candidate's mental and physical fitness to carry out their work responsibilities. An 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.

### 8.4. Individuals who have lived or worked outside of the UK

When appointing a UK citizen who has lived overseas or a non UK citizen, a Certificate of Good Conduct must be obtained (where possible) from the embassy of the country in which the applicant has specified that they have spent a significant period of time in. This must happen where the applicant has lived or worked (including studying) in a foreign country for a period of 6 months within the last 5 years.

There are a number of exemptions to this:

- If the applicant is currently employed by the school and has already provided the certificate, which can be used for future appointments providing there is no break in service.
- Applicants that have spent time overseas as part of Her Majesty's Service i.e. Army, Navy, Air Force.
- Applicants that are seeking asylum will be unable to provide such documentation, as contacting the embassy may jeopardise their safety.

If an applicant is unable to provide a Certificate of Good Conduct, evidence must be presented to show that an attempt to obtain a copy has been made.

Any costs incurred for obtaining a Certificate of Good Conduct must be met by the individual and will not be reimbursed.

If an applicant is unable to obtain a Certificate of Good Conduct, then a Risk Assessment Form must be completed and signed off. All other pre-employment checks must be completed.

## **9. Offer of Employment**

9.1 The appointment of all new employees is subject to the receipt of:

- a satisfactory enhanced DBS Certificate and barred check list
- confirmation that the candidate does not live with a disqualified person (if the member of staff is expected to work with children under the age of 8)
- receipt of completed health check questionnaire
- receipt of final references from previous employers
- a valid work permit from overseas candidates
- the candidate's details have been added to CVT's single central record.
- copies of qualifications and proof of identity have been seen and copied for the employee files.

9.2 The Rehabilitation of Offenders Act 1974

The Rehabilitation of Offenders Act 1974 does not apply to positions which involve working with, or having access to pupils. Therefore, any convictions and cautions that would normally be considered 'SPENT' must be declared when applying for any position at CVT.



### 9.3 Dealing with convictions

CVT operates a formal procedure if a DBS Certificate is returned with details of convictions.

Consideration will be given to the Rehabilitation of Offenders Act 1974 and also:

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

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

### 9.4 Risk Assessments - Starting staff before full checks are complete

Where there are gaps in information, concerns or matters of judgement, the Operations Manager will undertake a risk assessment (Appendix 2 – DBS Risk Assessment Form) to determine whether the appointment should proceed or the offer is withdrawn. Consideration will need to be given to the information available and whether further information/advice is required, whether the safety risk is small or can be mitigated by temporary work restrictions.

The Operations Manager will be held accountable for this decision and must 'sign off' the documentation to clear the appointment for processing. Where concerns arise these need to be discussed with the Director before any appointment is confirmed.

Where it is appropriate, any concerns must be reported to the designated Local Authority Designated Officer (LADO), in accordance with the Whistle blowing policy.

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

CVT reserves the right to not proceed with or to terminate employment with immediate effect if the DBS checks reveals convictions which have not been declared on the application form, or if any of the documents referred to have been falsified in any way.

## **10. Single Central Record**

CVT will keep a single central record, referred to in the regulations as the register. The single central record must cover all staff (including supply staff and teacher trainees on salaried routes) who work at CVT. Confirmation that these checks have been carried out along with the date the check was undertaken/obtained must be logged on this record for all employees of CVT.

## **11. Induction**

- 11.1. All staff who are new to CVT will receive full induction training that will include the CVT's safeguarding policies and guidance on Health and Safety and safe working.
- 11.2. Regular meetings will be held during the first 3 months of employment between the new employee and the appropriate line manager.
- 11.3. CVT recognises that safer recruitment and selection is not just about the start of employment, but should be part of a larger policy framework for all staff. CVT will therefore provide ongoing training and support for all staff.
- 11.4. Staff will be required to read CVT's Child Protection and Health and Safety Policy.
- 11.5. Staff will be required to read and sign to confirm that they have read and understood "Keeping Children Safe in Education" (DfE Sept 2016).

## **12. Agency and third-party staff**

CVT will obtain written notification from any agency, or third-party organisation they use that the organisation has carried out the checks (in respect of the enhanced DBS certificate, written notification that confirms the certificate has been obtained by either the employment business or another such business), on an individual who will be working in one of CVT's settings that CVT staff would otherwise perform. Where the position requires a barred list check, this must be obtained by the agency or third-party prior to appointing that individual. CVT must also check that the person presenting themselves for work is the same person on whom the checks have been made.

## **13. Contractors**

CVT will ensure that any contractor, or any employee of the contractor, who is to work at one of CVT's settings, 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. In considering whether the contact is regular, it is irrelevant whether

the contractor works on a single site or across a number of sites.

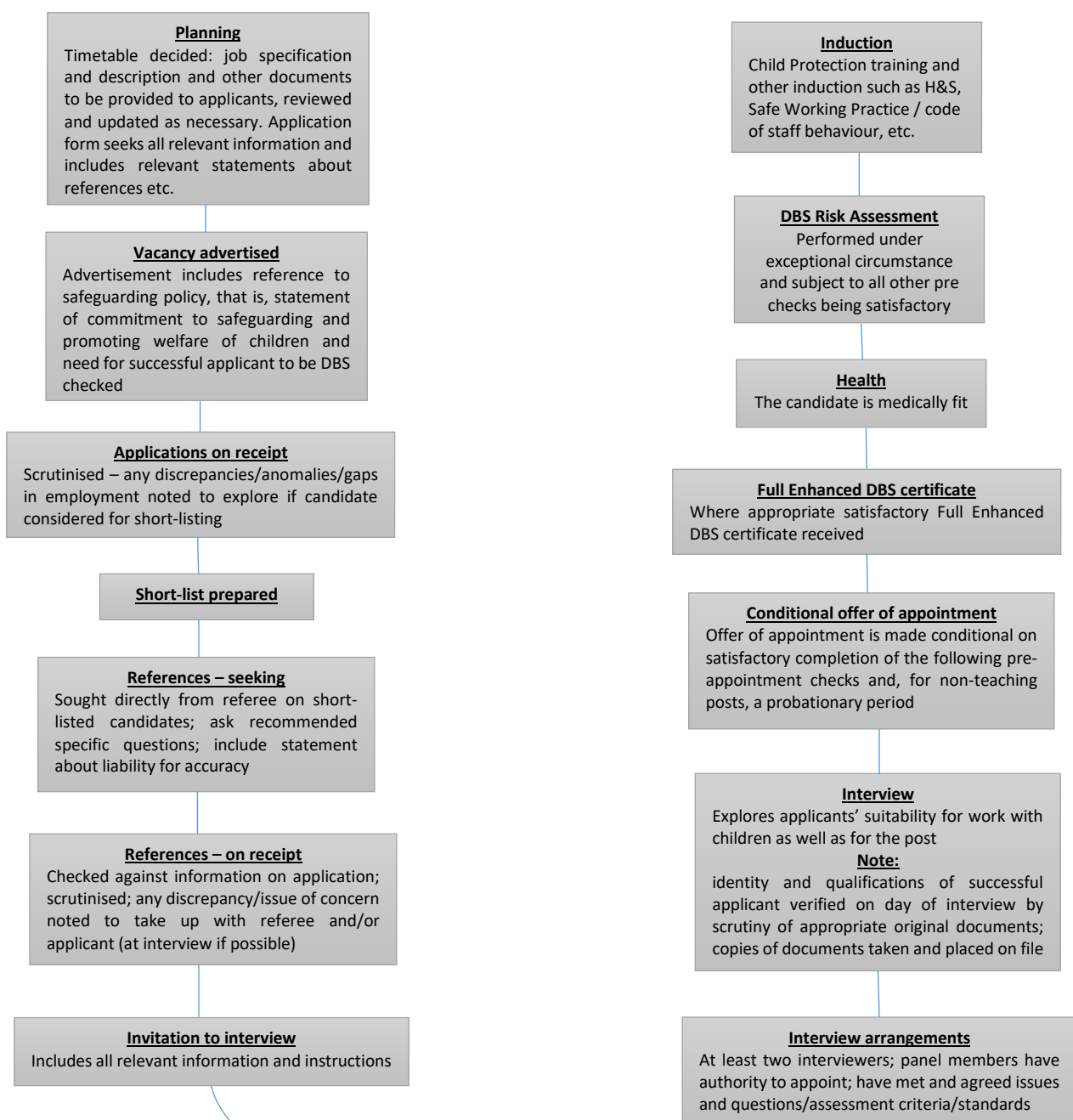
1. Under no circumstances should a contractor in respect of whom no checks have been obtained be allowed to work unsupervised, or engage in regulated activity. CVT is responsible for determining the appropriate level of supervision depending on the circumstances.
2. If a contractor working at a CVT setting is self-employed, CVT 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.
3. CVT will always check the identity of contractors and their staff on arrival at one of CVT's settings.

#### **14. Policy Review**

This policy will be reviewed annually and/or in light of any changes in legislation or advice received from the Department of Education (DFE).



## Appendix 1 – Safer Recruitment Process & Procedure



## Appendix 2 – Disclosure and Barring Service (DBS) Risk Assessment

This Risk Assessment is to be completed if the Cornerstone is considering allowing a newly appointed employee to commence work before their Disclosure and Barring Service (previously CRB) results are received by the Authority. New employees should not normally commence work pending DBS results. This should only be considered in exceptional circumstances subject to ALL other pre-employment checks being satisfactorily completed (such as references, medical form, qualification check etc)

**A Risk Assessment must be completed in every case, in order to ensure that the decision making process is clear and consistent. Once the DBS confirmation is completed, if the appointment is confirmed, the form should be kept in the employee's personal file.**

### SECTION 1: To be completed by the Line Manager

<b>Post to be filled</b>	
<b>Name of Applicant</b>	
<b>Date interviewed</b>	
<b>Type of check</b>	<b>Enhanced</b>
<b>Date DBS application form sent to Employee Vetting Team</b>	
<b>Has the candidate declared any previous cautions/convictions/reprimands/warnings?</b> * If yes please confirm that you have discussed this with the candidate and have satisfied yourself that this does not pose a risk to their appointment	<b>I have discussed....</b>
<b>List of Concern checked?</b> (for Social Services only – please check with the HR Assistant that this has been completed)	<b>N/A</b>
<b>Essential Qualifications checked?</b>	
<b>Identity check completed?</b> (e.g. Driving Licence, Passport, Birth Certificate)	
<b>Have there been any unexplained gaps in employment history?</b> * If yes, has this been satisfactorily explained by the candidate?	
<b>Do they have a cleared reference from a recent employer which contains no reservations regarding suitability to work with children/young people/vulnerable adults? Please provide information</b>	
<b>Please state what special arrangements are being put in place to reduce all identified risks pending receipt of the DBS disclosure</b>	

(e.g. supervised at all times etc)	
Is the line manager confident that all work with children/young people/vulnerable adults will be closely supervised?	
Is the line manager confident that the person will not be given any responsibility for high risk activities (i.e. overnight stays, sports activities etc)	
In light of the above does the candidate constitute an acceptable 'risk'?	

**SECTION 2: To be completed by Operations Manager (for teaching posts)**

Name Operations Manager:	
Declaration:	I understand Cornerstone Vocational Training's policy on appointment pending DBS clearance and I believe the applicant does not constitute a risk for the following reasons:
Signed:	
Date:	

**SECTION 3: To be completed by the Head of Company for teaching staff**

Head of Company	I agree/disagree* with the decision to appoint/not appoint* the candidate for the following reason(s):
Name (Print):	.....
Signed:	
Date:	