

Blossom House School



SAFER RECRUITMENT POLICY Whole School

Last reviewed September 2021 Zelah Hodges

Next review due September 2022

Policy Name:	Safer Recruitment Policy (including students, work experience, placements, volunteers, supply staff, contractors and visitors) Foundation stage, Primary, Secondary, Post 16
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1. Introduction to Policy

This policy provides a framework for the safe, efficient, effective and fair recruitment of all staff, including vetting checks of student placements, work experience, volunteers, agency staff, contractors and visitors.

Blossom House is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment. All newly recruited staff undergo a thorough and rigorous recruitment process to ensure safeguarding and promoting the welfare of Blossom House pupils is paramount.

Aims of the Policy

- To ensure that newly recruited staff possess the most appropriate blend of qualifications, experience, knowledge, skills and abilities to meet the demands of the post and the needs of the School.
- To ensure a consistent and equitable approach to the appointment of staff.
- To ensure relevant legislation and best practice is adhered to.
- To ensure robust recruitment and vetting procedures that deter and prevent people who are unsuitable to work with children (or vulnerable adults where applicable) from applying or securing employment, or operating in regulated activity in any capacity, at Blossom House School.

Current Legislation & Fairness

The policy ensures that the School complies with the following relevant legislation, codes of conduct and good working practice:

- The Employment Equality Regulations 2003 and 2006
- UK General Data Protection Regulation (UK GDPR).
- The Equality Act - 2010
- The Police Act 1997, and the Serious Crime Act - 2007

- Immigration Act 2016
- Keeping Children Safe in Education - September 2021 (<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>)
- Recruit teachers from overseas (update 19th May 2021) <https://www.gov.uk/guidance/recruit-teachers-from-overseas#safeguarding-checks-for-teachers-from-overseas>
- Rehabilitation of Offenders Act 1974 [exceptions] Order 1975 [2013 and 2020]
- The Prevent Duty - March 2016
- Independent Schools Inspectorate (ISI) handbook for the inspection of schools- the regulatory requirements - September 2019 (Note has been taken of Guidance issued in 2018 regarding Section 128 checks).

Blossom House School has the legal responsibility to ensure that no unlawful discrimination occurs in the recruitment and selection process on the grounds of sex, race, disability, sexual orientation, religion or belief and age. Equality of opportunity is an integral part of the recruitment and selection process, from advertising the role to final selection and induction.

Responsibilities

The Proprietor of Blossom House School holds overall responsibility for the recruitment and selection of staff and the vetting of anyone connected to the School operating in regulated activity. The Human Resources team are responsible for ensuring vetting checks are undertaken and recorded appropriately on the Single Central Record. HR are also responsible for ensuring that there must be a member of staff on the interview panel who has been safer recruitment trained. The Administration teams are responsible for ensuring that no one enters the school without the appropriate checks. All staff are responsible for notifying the Admin team of visitors and the HR team of use of contractors / supply staff. The Designated Safeguarding Lead and the Safeguarding Lead Member on the Advisory Body advise and support on all aspects of Safer Recruitment.

2. Job Description, Person Specification and Advertisement

The HR Team provides a template for drawing up adverts, job descriptions and person specifications, the format of which should be adhered to. This includes statements, responsibilities and attributes related to the safeguarding of children in schools and suitability to work with children.

The Job Description, Person Specification and Advert are reviewed and updated prior to advertising. The role and must be approved by the Principal. The Job Description and Person Specification will be sent to prospective applicants as part of the full application pack, and forms the basis for decision-making regarding the suitability of candidates for the role.

Job Description

The Job Description details the purpose, tasks and responsibilities of the job. It includes the safeguarding requirements of the job role.

A good job description is useful for all jobs. It can help with induction and training. It provides the basis for drawing up a Person Specification – a profile of the skills and aptitudes considered essential and desirable in the jobholder. It enables prospective applicants to assess themselves for the job and provides a benchmark for judging achievements and measuring success during performance management.

Person Specification

Drawing up the Person Specification allows the organisation to profile the ideal person to fill the job. It is very important that the skills, aptitudes and knowledge included in the Specification are related precisely to the needs of the job. Criteria is listed as essential or desirable.

It is important not to set unnecessary requirements and to avoid any possibility of discrimination against particular groups of potential applicants.

Factors considered when compiling the specification include:

- Skills, knowledge and aptitudes directly related to the job.
- The type of experience necessary. (Note: ensuring that the length of experience required does not adversely discriminate against various ages.)
- The competencies necessary.
- Education and training, sufficient as is necessary for satisfactory job performance.
- Any criteria relating to personal qualities or circumstances which must be essential and directly related to the job, and must be applied equally to all groups irrespective of age, sex, race, nationality, creed, disability, membership or non-membership of a trade union. To do otherwise is potentially discriminatory.

The Person Specification supports the selection and subsequent interview to operate in a systematic way, as bias-free as possible.

Advertisements

It is imperative that vacancies are advertised in the most appropriate, fair and cost-effective manner, to attract an appropriate number of the most suitable candidates.

In the interests of fairness all vacancies should be advertised internally as well as where necessary externally.

Adverts will be placed on appropriate web sites, our own school website and in relevant publications and professional journals. Vacancies may also be placed with recruitment agencies. Blossom House aims to utilise a varied array of attraction methods in order to promote diversity of applicants.

Any advert will make clear the School's commitment to safeguarding and promoting the welfare of children; and make clear that safeguarding checks will be undertaken. A realistic closing date is set. A minimum of two weeks is recommended; however, it is usually advisable to have a closing date set at three to four weeks after the date of publication in professional journals.

Recruitment Log

An excel detailed log of all recruitment activities, adverts placed, interviews scheduled is updated by Human Resources on a regular basis. The Recruitment Log allows the School to keep a track of all recruitment activities and is a vital tool in assessing the success of recruitment campaigns and responses to adverts.

Informal visits

Applicant visits to school before deciding to apply can be a useful self-selection tool and may sometimes be accommodated depending on availability of staff. However, the tour of the school should not be given by a member of the recruiting team (to ensure fairness on applicants unable to visit) and a visit can only be made on provision of a fully detailed CV and photo ID. These visits will be made in line with the policy for visitors (below).

3 Application Forms

Fully completed application forms are mandatory. All applicants applying for temporary, fixed term, permanent and maternity cover roles must complete a school application form. CV's may accompany applications, but the application form must still be completed for all roles.

The form includes a statement to applicants that it is an offence to apply for the role if they are barred from engaging in regulated activity with children (and adults if applicable) and sets out a link to the School child protection and Employment of Ex-offenders Policies.

The application form requires the applicant to provide personal details, current and former names, current address and NI number; an education / employment history with reasons for leaving each job and explanations for any gaps; qualification details; referees; personal statement; situational recruitment activity and a signed declaration.

4 Responses to Advertisements and Equal Opportunities

All applicants are given equal consideration, in accordance with the requirements of the Equality Act 2010, as to the suitability of the applicant for the post advertised and whether they should be called for interview.

Everyone who works at the school, or applies to work at the School will be treated fairly and valued equally. All conditions of services and job requirements fit the needs of the service. No job applicant or employee will receive less favourable treatment regardless of age, disability, race, nationality, ethnic or national origin, gender, religion or belief, sexual orientation, domestic circumstances, social and employment status, HIV status, gender reassignment or political affiliation or trade union membership.

The School strives to be a place where people want to work and to adhere to good employment practice ensuring equality and diversity are valued.

Applicants who are invited for interview are advised in writing to contact HR confidentially should they require any reasonable adjustments during the interview and assessment day.

5 Short-listing

The short-listing is undertaken by the Recruiting Team (usually the team manager and always a member of the HR team).

Safer Recruitment Training

At least one member of the Recruiting Team will have received Safer Recruitment Training.

Safer Recruitment Training is paid for by the school and as at the date of publication of this policy, training is provided by NSPCC (<https://learning.nspcc.org.uk/training/schools/safer-recruitment-in-education-training/>).

Initial short-list

From a safer recruitment perspective, the short listing includes consideration of any inconsistencies of information, appropriateness in statements, gaps in employment/education history and appropriateness of referees provided. The applicant will be approached via email to give details of inconsistencies/gaps and to give alternative or additional referees where needed.

In addition, the team will select candidates for interview that demonstrate the experience, knowledge and attributes detailed in the job description and person specification.

6 Self-declaration and references

Candidates short-listed to this stage are then sent a self-declaration form of their criminal record or information that would make them unsuitable to work with children (and vulnerable adults where appropriate).

The HR team apply for references. Applicants are required to provide the names and addresses for work/education history covering at least the recent 5 years. The details are vetted and checked to ensure the reference contacts are valid, for example no personal email addresses and from a senior member of staff (such as the Head of the school).

Reference requests are completed on the school reference template, which details a number of safeguarding questions to assess the candidate's suitability to work in a school and perform the relevant job role. The recruiting manager and HR double check the reference and ensure that employment dates correspond with the information provided in the application form. If there are delays in obtaining a reference, then a telephone reference can be completed and properly recorded in writing, and this should be followed up with a written confirmation and request for a written reference. References are followed up with a telephone call to the referee to verify information.

7 Interviews

Interview days

For the majority of roles the interview day consists of a tour of the school, opportunity to observe a class, being observed delivering a lesson / assisting in a lesson, a written task and an interview. This range of selection techniques gives the recruiting team an opportunity to view the applicant's interactions with pupils, their ability to carry out the role as required, as well as being able to ask probing questions at interview.

Invitation to interview

The HR team will send short-listed applicants an invite to interview. This is a detailed document outlining the timetable for the day, the staff involved, the documents required (photo ID, right to work, proof of address and qualifications), directions to school, dress code and where to ask for adjustments if required. Our candidate privacy statement is also included along with a statement of our commitment to safeguarding.

Structured Interview Questions

A structured interview designed to discover all relevant information and assess the competencies of the applicant based on the job description and person specification is an efficient method of focusing on the match between the clearly defined criteria of the job and the candidate. It also means that there is a consistent form to the interviews, particularly important when there are several candidates to be interviewed. All applicants called for interview shall be asked the same questions and be requested to complete the same tasks, as appropriate to the position to be filled. In addition to the candidate's ability to perform the duties of the post, the interview will ascertain the candidate's suitability to work with children, verify mental and physical fitness and explore issues relating to safeguarding and promoting the welfare of children.

Unstructured interviews are very poor for recruiting the right person, and given the limited time available in which to make such an important decision, questions are prepared carefully.

The HR Team have created a master list of competency-based interview questions to assist panels in selecting the most appropriate interview questions for each job role. The master list also includes a list of safer recruitment questions and subsequent responses for concern.

Interview panel

All interviews are carried out face to face and at least one member of a recruitment panel will have had safer recruitment training. For teaching and therapy roles a multi-disciplinary team will take the interview (i.e. a teacher and a therapist).

Notes and observation records

Notes are made on observations (using a structured template) and during the interview, recording relevant answers and details. Any written task is also kept on record. This is not only to facilitate the decision-making process, but also to provide feedback to the candidate if requested.

8 Appointment of Staff

Following interview of appropriate candidates, the selection panel will, with the Principal's agreement, make the selection of the candidate most suited for the position. A verbal offer of appointment will be made, conditional upon receipt of satisfactory completion of pre-employment checks. Initial offers of employment are usually made directly by the School Principal. All candidates who were interviewed and found to be unsuccessful for the role, will be notified as soon as possible, sometimes by telephone if possible, but always in writing.

9 Pre-employment Procedure

Having been advised of a staff appointment the HR Team will send an email to the successful candidate confirming the conditional appointment (subject to satisfactory safeguarding checks), the initial salary and scale point, the starting date of the appointment and the hours to be worked. This email also contains notice of a Children's Barred List Check and that the School will enter their details onto the Single Central Record. Attached are the following documents for the new employee to read and agree to:

- Safeguarding Children and Child Protection policy (including the school's safeguarding response to children who go missing from education, and the role of the DSL)
- Staff Code of Conduct policy
- Staff Mobile Phone Policy
- Behaviour Policy
- Whistleblowing policy
- First Aid policy
- Fire Evacuation policy
- School Privacy Notice
- Read Part 1 of 'Keeping Children Safe in Education' guidance for schools and colleges.

The HR team will complete an appointment checklist for each successful applicant. The checklist details all the relevant safeguarding checks and processes that must be completed before an employment start date can be confirmed. The HR Team will send to the new employee for completion and return an Annual school suitability form (this form includes, next of kin, contact details, health questionnaire, confidentiality agreement, dress code).

Teacher Prohibition and Children's Barred List check

The HR Team will also check that a candidate is not subject to a prohibition order issued by the Secretary of State, and check the teachers who have failed induction or probation and GTCE sanctions list. The team will also check the candidate name (including all previous names) and date of birth against the Children's Barred List (should a current DBS certificate not have been provided already). This is all carried out using the TRA Employer Access Service. Any person taking up a senior management position will be checked to ensure they are not subject to a section 128 direction.

Personal Identity, address, P45 and right to work in the UK check

The HR Team will need to see the original passport, birth certificate, marriage certificate, any documents relating to change of name where appropriate and two forms of proof of address. Copies are made and stored safely in the Personnel File.

Qualifications

The HR team will request original certificates to verify qualifications relevant to the post. For therapy posts the team will check the register of the associated professional body (such as the Health and Care Professions Council). For teaching posts, the team will verify any award of QTS and the completion of teacher induction or probation using the TRA Employer Access Service.

Details of dates and who undertook all of the checks above are entered onto the Single Central Register (SCR).

DBS check

DBS checks must be obtained for all staff working at the school. The level of check will be an enhanced check for all roles, and a check of the children's barred list. For those roles which involve providing personal therapy in post-16 or overseeing therapy staff in Post-16, then an adult's barred check will also be requested. A record of the DBS check number and date will be recorded in the school SCR, and repeat checks may be completed at the discretion of the school and within a time-frame as agreed by the Senior Management Team.

The School should already be aware of disclosures that would appear on an applicants DBS certificate through the self-declaration form completed before interview and a risk assessment would have been carried out. Should a DBS check result in a disclosure, this will be discussed directly and only with the relevant parties, usually the applicant and the school Principal. A risk assessment will be carried out. Should any cautions or convictions protected under the Rehabilitation of Offenders Act 1974 [exceptions] Order 1975 [2013 and 2020] be inadvertently disclosed, it is unlawful to take that information into account in suitability decisions. Confidentiality must be maintained at all times.

If all the other safeguarding checks are completed, including a check of the Children's barred list, and there is a delay with obtaining the full DBS, a decision to confirm or delay the start date must be made on the basis of a risk assessment and with the full involvement of the School Principal and the Designated Safeguarding Lead. All attempts must be made to expedite any delayed DBS applications.

Individuals who have lived or worked outside the UK

All the checks that are described above are undertaken. The DBS check may not provide a complete picture of an individual's criminal record abroad. If an applicant has lived or worked outside of the UK, in particular in the previous 5 years but where deemed appropriate a longer timescale, the School will ask the applicant to make further checks which can include:

- an overseas police check¹ and / or

¹ Home Office Guidance on overseas police checks can be found on gov.uk

- a letter of professional standing from the professional regulating authority in the country in which the applicant has worked² (for teaching roles, for example, check documents issued by overseas teaching authorities where available) and / or
- a certificate of Good Repute / Letter of Good Conduct from the embassy of the country they have spent time in.
- If these are not obtained, they must provide evidence that an attempt was made to obtain a certificate / letter.

Limitations of Certificate of Good Conduct/Letter of Good repute

It is noted that information provided on overseas police and good repute certificates / letters of good conduct can be subjective due to the following reasons;

- Data protection
- Political willingness e.g. Countries with political unrest are unlikely to provide information.
- Culture e.g. age of consent in a number of EU countries is less than 16.
- Each country may provide different information, and in some cases, will not provide any information.

Where the information is not available the school will seek alternative methods of checking suitability (such as obtaining references from place of work in that country) and the Principal and Designated Safeguarding Lead / HR Manager will undertake a risk assessment that supports the informed decision making on whether to proceed with the appointment.

10 Employment Agencies, Temporary Staff, Volunteers, Students, Advisory Body, Contractors and Visitors

Overarching visitor procedure

All staff are aware that the Admin/Reception team are to be advised of anyone visiting the school in advance of the visit or entry may be denied. All visitors are also booked into the online diary. The Admin team have a flow chart to refer to, to identify what kind of checks are required for which type of visitor. In advance of the visit the visitor is advised of any documentation they should provide. This is done by the Admin team or the HR team depending on the type of visitor. ID and any other requested documentation are checked on arrival by the Admin team. Visitors are signed into the visitor book and given a visitor or temporary pass.

Temporary Staff, Volunteers, Advisory Body or Students

The vetting procedures for Temporary Staff, Volunteers, Advisory Body or Students attached to the School as part of their studies; who are not subject to a written Contract of Employment but are in regulated activity, are as above. A Section 128 check is made for the Advisory Body.

Employment Agencies and Contractors

The HR Team ensure that written confirmation is received from Employment Agencies and Contractors that they have undertaken the vetting checks outlined above before allowing their employees to work in regulated activity at our school. Where a contractor is self-employed the HR Team will carry out the checks indicated above if the contractor is to work in regulated activity.

² Advice about which regulatory or professional body applicants should contact is available from the UK Centre for Professional Qualifications and the Regulated Professions Database

University Students on Placement

If University students on placement are working in regulated activity the HR team will ensure that written confirmation is received from the education provider that they have undertaken the vetting checks outlined above. If the team are not satisfied with the checks or the checks haven't been undertaken they will take further checks as appropriate.

Details of dates and who undertook all of the checks above are entered onto the Single Central Register (SCR).

Visiting Professionals

Visiting professionals working in regulated activity will be asked to provide ID and either their DBS certificate or confirmation from their employer that their staff have the appropriate checks.

Visiting Speakers

Visiting speakers, whether invited by staff or by the pupils themselves, must be suitable and appropriately supervised. Speakers must not engage in inappropriate discussions which may offend or harm others, undermine fundamental British values, express any prejudicial views, or attempt to influence or impose their personal values, attitudes or beliefs on pupils or staff.

Where any visitor is not in regulated activity a risk assessment will be undertaken where appropriate (for example with regards volunteers and work experience) and staff will supervise the visitor at all times.

11 Record Keeping, Retention & GDPR Privacy Notice

The HR Team shall complete, as appropriate, the details of the new member of staff any non-employees working in regulated activity on the Single Central Record (reviewed annually by the Safeguarding Lead for the Advisory Body).

The team will ensure that all appropriate details and records are obtained. All documents and records relating to members of Staff shall be kept in an individual folder within the file of staff record.

Documents relating to Temporary Staff, and Students are to be retained and filed separately from Permanent Staff Files, all being under the control of the HR Team.

Details and applications from unsuccessful candidates will be safely shredded in accordance with the Schools Data Protection and Data Retention Policy.

Records of successful applicants (i.e.: Employees, etc.) will be kept in accordance with relevant legislation and the Schools Data Protection and Data Retention Policy.

All successful candidates are sent two individual privacy notices, one to sign and return and one to retain. Information regarding Applicant Privacy Notices is available on the school website.

12 Ongoing safeguarding

Please refer to the Safeguarding and Child Protection Policy.

Induction

For details of the induction programme for permanent staff, please refer to the Induction Policy. To ensure the ongoing safeguarding of children, all permanent, fixed term and temporary staff, students and agency supply staff must undergo a Child Protection Induction with the Designated Safeguarding Lead as soon as possible. Please see the Safeguarding Children and Child Protection policy for other ways the school manages a continuing commitment to safeguarding. Within the first week induction with HR, and the Health and Safety Team will take place, and where relevant the Behaviour Team, Occupational Therapy, Physiotherapy, Speech & Language Therapy, Art Therapy, Music Therapy, etc. A record of completed induction is kept and forwarded to HR for filing and record keeping.

Annual Suitability Form

Staff are asked to complete the form on an annual basis to ensure we have to date information (this form includes, Safeguarding Suitability (inc. 2018 Childcare Disqualification Regs where appropriate), Next of Kin, Contact Details, Health Questionnaire, Confidentiality Agreement, Dress Code).

Referring to DBS (Disclosure and Barring Service)

Blossom House School is aware of their obligation to refer any person (whether employed, contracted, a volunteer or student) to DBS if:

- They are dismissed because they have harmed someone;
- They are dismissed/removed from working in regulated activity because they might have harmed someone;
- They were going to be dismissed for either of these reasons, but they resigned first.

Referring to NCTL (National College for Teaching and Leadership)

Blossom House School is aware of their duty to consider making a referral to the NCTL where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and a prohibition order may be appropriate.