





# Safer Recruitment Policy

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CHAIR OF TRUSTEES:	
CEO:	

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# 1. Introduction

The Eynsham Partnership Academy (EPA) recognises that the safe recruitment of its staff and volunteers in school is essential to safeguard the children in attendance.

Safer practice in recruitment means thinking about and including issues relating to child protection and safeguarding and promoting the welfare of children at every stage of the process and for all people being recruited.

This policy is **NOT** a Recruitment and Selection Guide and deals only with safer recruitment.

This policy has been adopted by the Directing Board of the Eynsham Partnership Academy (EPA) for use in its schools and the central team. It complies with guidance outlined in *Keeping Children Safe in Education* (DfE September 2022) and applies to all staff and volunteers working in the EPA.

## 2. Aims and Objectives

The aim of this policy is to embed safer recruitment practices and procedures throughout the EPA and to support the creation of a safer culture by reinforcing the safeguarding and wellbeing of children and young people in our care.

This policy is an essential element in creating and maintaining a safe and supportive environment for all pupils, staff and others within the EPA and aims to ensure both safe and fair recruitment and selection of all staff and volunteers by:

- Helping to deter, reject or identify people who are unsuitable to work with pupils by having appropriate selection and appointment procedures;
- ensuring that the best staff are recruited on the basis of their suitability, merits and abilities as measured against the job description and person specification;
- ensuring that no applicant is discriminated against on any grounds as per the Equality Act 2010;
- ensuring compliance with the Keeping Children Safe in Education 2022 statutory guidance for schools and colleges on safeguarding children and safer recruitment in education;
- ensuring compliance with current employment legislation.

The EPA is committed to using procedures that deal effectively with those adults who fail to comply with safeguarding and child protection procedures and practices.

Advice and support on the application of this policy is available from the EPA HR Team.

### **3. Consistency of Treatment and Fairness**

The EPA is committed to ensuring consistency of treatment and fairness and will abide by all relevant equality legislation, i.e. Employment Rights Act 1996, Employment Relations Act 1999, Employment Act 2002, Part-Time Workers (Prevention of Less Favourable Treatment) Regulations 2000, Fixed Term Employees (Prevention of Less Favourable Treatment) Regulations 2002 and Equalities Act 2010.

Particular care should be taken to ensure consistency of treatment and fairness across all of the schools in the trust.

### **4. Roles and Responsibilities**

4.1. The Directing Board of the EPA will:

- ensure that effective policies and procedures are in place for the safe and fair recruitment and selection of staff and volunteers in accordance with Department for Education guidance and legal requirements and monitor the schools' compliance with them
- ensure that appropriate staff, directors and governors have completed Safer Recruitment training (this must be renewed every 5 years)

4.2 The Chief Executive Officer will:

- ensure that the EPA operates safe and fair recruitment and selection procedures which are regularly reviewed and updated to reflect any changes to legislation and statutory guidance

4.3 Head teachers, and all other staff involved in recruitment, will:

- ensure that all appropriate checks have been carried out on staff and volunteers in their school
- monitor contractors and agencies' compliance with this document
- promote the safety and wellbeing of children and young people at every stage of the recruitment process

4.4. The Local Governing Board of each EPA school will:

- monitor their school's compliance with all policies and procedures in place for recruitment of all staff and volunteers.

## 5. Recruitment and Selection Procedure

### 5.1 Selection Panel

Any person with a **personal** or **pecuniary interest** in the appointment of a particular applicant must declare it as soon as they are aware of the individual's application and avoid any involvement in the recruitment and selection decision making.

At least one member of the selection panel will have successfully completed training in safer recruitment within the last 5 years

### 5.2 Job Descriptions and Person Specifications

Every job description and person specification will make reference to the postholder's responsibility for safeguarding and promoting the welfare of children.

The person specification will include specific reference to suitability to work with children.

### 5.3 Advertisements

Adverts for all posts, paid or unpaid, will include the EPA's commitment to Safeguarding and the fact the post is exempt from the Rehabilitation of Offenders Act i.e.

*The Eynsham Partnership Academy is committed to safeguarding and promoting the welfare of children and young people/vulnerable adults and expects all staff and volunteers to share this commitment.*

*This position is subject to appropriate vetting procedures including a criminal record check from the Disclosure and Barring Service (formerly CRB) which will require you to disclose details of all unspent and unfiltered spent reprimands, formal warnings, cautions and convictions as part of the recruitment process.*

### 5.4 Recruitment Information

All applicants will receive recruitment information, including the following:

- a statement of the EPA's commitment to ensuring the safety and wellbeing of pupils
- our policy statement on the employment of ex-offenders.
- job description and person specification
- information about the selection procedure for the post
- an application form

and details about where to find the:

- Child Protection and Safeguarding Policy
- Safer Recruitment Policy
- Whistleblowing policy
- Staff Code of Conduct
- GDPR Privacy policies

## 5.5 Application Forms

Where the role involves engaging in regulated activity relevant to children, a statement will be included in the application form or elsewhere 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.

All prospective applicants must complete, in full, an application form. The application form includes a statement that the information 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. The application form will include the following:

- Personal details, current and former names, current address and national insurance number.
- Details of the applicants present (or last) employment and reason for leaving.
- Full employment history, (since leaving school, including education, employment and voluntary work) including reasons for any gaps in employment.
- Qualifications, the awarding body and date of award.
- Details of referees/references (see below for further information).
- A statement of the personal qualities and experience that the applicant believes are relevant to their suitability for the post advertised and how they meet the person specification.

CVs or general letters of application will not be accepted.

Application forms and supporting information will be scrutinised fully and explored with the applicant where necessary to resolve any discrepancies or anomalies.

## 5.6 Shortlisting

Shortlisted candidates will be asked to complete a self-declaration of their criminal record and information that would make them unsuitable to work with children. For example:

- If they have a criminal history.
- Whether they are included on the barred list.
- Whether they are prohibited from teaching.

- Whether they are prohibited from taking part in the management of an independent school.
- Information about any criminal offences committed in any country in line with the law as applicable in England and Wales, not the law in their country of origin or where they were convicted.
- If they are known to the police and children's social care.
- If they have been disqualified from providing childcare.
- Any relevant overseas information.

This information will only be requested from applicants who have been shortlisted. The information will not be requested in the application form to decide who should be shortlisted.

The purpose of a self-declaration is so that candidates will have the opportunity to share relevant information and allow this to be discussed and considered at interview before the DBS certificate is received.

We will:

- Ensure that at least two people carry out the shortlisting exercise (it is recommended that those who shortlist carry out the interview for a consistent approach).
- Consider any inconsistencies and look for gaps in employment and reasons given for them.
- Explore all potential concerns.

In addition, as part of the shortlisting process we will carry out an online search as part of our due diligence on the shortlisted candidates. This search will be conducted by a senior member of the School staff who will not be involved in the recruitment process. A consistent approach will be taken, and the results will be recorded in the 'Online Search Record' form (see Annex 2 for detail of what may be searched/ recorded). The purpose of the online search is to help identify any incidents or issues relevant to suitability to work with children, that have happened and are publicly available online, which we may want to explore with the applicant at interview.

## **5.7 References**

References will always be obtained from the candidate's current employer. Where a candidate is not currently employed, verification of their most recent period of employment and reasons for leaving will be obtained from the school, college, or organisation at which they were last employed.

References will include specific questions relating to the role applied for, a candidate's suitability to work with children, any substantiated allegations relating to children and/or any disciplinary action taken in relation to their work or contact with children as a result of which penalties or sanctions have either expired or remain in force.

References will also be used to confirm details provided by the applicant in the application form (such as the experience and qualifications claimed by the applicant).



References will always be sought and obtained directly from the referee – they will not be accepted directly from the applicant.

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 such exchanges.

Open references or testimonials will not be accepted, and only written references will be considered.

Where electronic references are received we will ensure that they originate from a legitimate source.

References will be sought on all shortlisted candidates, including internal ones, and will be obtained 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. Where it is not possible to obtain references prior to interview because of delay on the part of the referee a reference will be received and scrutinised prior to confirmation of appointment.

In all instances where an applicant currently works in a school or educational setting, a reference will **always** be sought from the Headteacher (or Chair of Governors for Headteacher appointments) of that establishment.

If a candidate for a position is not currently employed in a school, but has been in their past, we will check with the school, college or local authority at which they were most recently employed, to confirm details of their employment and their reasons for leaving.

A minimum of two references will be received and scrutinised.

Information provided by the Headteacher for an internal candidate will be considered like a reference for an external candidate.

If a panel member knows something factual (i.e. that can be supported by evidence) about a potential candidate that other members may not know, the information will be shared so that the panel itself can decide if it is relevant.

Any information about past disciplinary action or allegations should be considered carefully when assessing the applicant's suitability for the post (including information obtained from the DfE Sign-in Teacher Services checks referred to below).

## 5.8 Interviews

Interviews will be required for all shortlisted applicants and will always be conducted face to face. Telephone interviews may be used at the shortlisting stage but will not be a substitute for a face to face interview.

Candidates will always be required to:

- Explain any gaps in employment.

- Explain any anomalies or discrepancies in the information available to the selection panel.
- Declare any information that is likely to appear on a DBS disclosure.
- Demonstrate their attitudes, motives and values for working with children and young people, and their capacity to safeguard and protect the welfare of children and young people.
- Bring with them evidence of their identity (photographic), address and qualifications. Original documents only will be accepted, and photocopies will be taken. Unsuccessful applicants' documents (copies) will be destroyed.

Students may be involved in the recruitment process in a meaningful way. Observing shortlisted candidates and appropriately supervised interaction with students is common and recognised as good practice.

All information considered in decision making will be clearly recorded along with decisions made.

## 6. Making the Offer of Appointment

### 6.1 The Offer

An offer of appointment to a successful candidate, including one who has lived or worked overseas, is conditional upon satisfactory completion of the following pre-employment checks.

The Appointing Officer will:

- Verify a candidate's identity, following the DBS identity checking guidelines <https://www.gov.uk/government/publications/dbs-identity-checking-guidelines/id-checking-guidelines-for-dbs-check-applications>. It is important to be sure that the person is who they claim to be, this includes being aware of the potential for individuals changing their name. Best practice is checking the name on their birth certificate, where this is available.
- Obtain a certificate for an enhanced DBS check with barred list information where the person will be engaging in regulated activity. Note that when using the DBS update service the original physical certificate still needs to be obtained.
- Obtain a separate barred list check if an individual will start work in regulated activity before the DBS certificate is available.
- Check that a candidate to be employed as a teacher, or to carry out 'teaching' work, is not subject to a prohibition order issued by the Secretary of State, using the DfE Sign-in Teacher Services website (formerly called 'Employer Access Online').
- Check that a candidate to be employed in a management position within the trust is not prohibited from doing so (a section 128 direction), using the DfE Sign-in Teacher Services website. Individuals taking part in 'management' may include individuals who are Trustees or Directors of the EPA, and such staff positions as follows: headteacher, any teaching positions on the senior leadership team, and any teaching positions which carry a department headship. Whether other individuals such as teachers with additional responsibilities could be prohibited from 'taking part in management' depends on the facts of each case.

- Verify the candidate's mental and physical fitness to carry out their work responsibilities – PEAQ, Assessment of Fitness to Work or equivalent approach.
- Conduct other checks related to the requirements of the role e.g. driving licence or valid insurance.
- Verify the person's right to work in the UK.
- If a person has lived, or worked outside the UK make any further appropriate checks (see para 19 below).
- Verify professional qualifications, by requesting certificates of evidence as appropriate.
- For staff who work in childcare provision or who are directly concerned with the management of such provision we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the Childcare (Disqualification) Regulations 2009 by requiring signature on a declaration form.

All information on the checks carried out will be recorded in the establishment's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks,

All checks will be followed up if they are unsatisfactory or if there are any discrepancies in the information received.

Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Employment will commence subject to all checks and procedures being satisfactorily completed.

If we have concerns about an existing member of staff's suitability to work with children, we will carry out all the relevant checks as if the individual was a new member of staff. We will also do this if an individual moves from a post that is not regulated activity to one that is.

## **6.2 DBS Certificate**

A DBS certificate will be obtained from the successful candidate before or as soon as practicable after appointment. If the applicant has subscribed to it and gives permission, we may undertake an online update check through the DBS Update Service.

Before using the Update Service, we will:

- Obtain consent from the applicant to do so.
- Confirm the certificate matches the individual's identity.
- Examine the original certificate to ensure that it is for the appropriate workforce and level of check, e.g. enhanced certificate/enhanced including barred list information.

Where we allow an individual to start work before a DBS is available, we will always ensure that the individual is appropriately supervised at all times and that all other checks, including a separate barred list check, have been completed.

## 7. Agency and Third-Party Staff

Written notification will be obtained from any agency, or third-party organisation we use, that the organisation has carried out the checks on an individual who will be working at the establishment that we would otherwise perform. This will include, as necessary, a barred list check prior to appointing that individual. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

Where the agency or organisation has obtained an enhanced DBS certificate before the person is due to begin work at the establishment, which has disclosed any matter or information, or any information was provided to the employment business, we will obtain a copy of the certificate from the agency.

## 8. Volunteers

We will obtain an enhanced DBS check (which should include children's barred list information) for all volunteers who are working in regulated activity with children.

We will prevent people who pose a risk of harm from working with children by adhering to statutory responsibilities to check staff who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required; and ensuring volunteers are appropriately supervised. Under no circumstances will we allow a volunteer in respect of whom no checks have been obtained to be left unsupervised or allowed to work in regulated activity.

If we engage volunteers we will adopt the same recruitment measures as we would for paid staff. Where the volunteering role will be a one-off such as accompanying teachers and students on a day outing or helping at a school fete, such measures may be unnecessary provided that the person is not to be left alone and unsupervised in charge of children.

We will undertake a risk assessment and use our professional judgement and experience when deciding whether to obtain an enhanced DBS certificate for any volunteer not engaging in regulated activity. In doing so we will consider:

- The nature of the work with children.
- What we know about the volunteer, including formal or informal information offered by staff, parents and other volunteers.
- Whether the volunteer has other employment or undertakes voluntary activities where referees can advise on suitability.
- Whether the role is eligible for an enhanced DBS check.

Details of the risk assessment will be recorded.

## **9. Trainee Teachers**

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

In both cases, this includes checks to ensure that relevant individuals, normally those employed in a primary school, are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

## **10. Governors**

All local governing board members in an academy trust must have an Enhanced DBS check. Any governors who volunteer in our establishment will be treated on the same basis as other volunteers, that is, an Enhanced DBS check with a barred list check if they are to be engaged in regulated activity.

Following the stipulation in Keeping Children Safe in Education, we will also use the DfE Sign-in Teacher Services website to check if any person we propose to recruit as a governor (and any existing governor) is subject to a section 128 direction.

## **11. Proprietors of the EPA**

All Trustees/ Directors of the EPA will have an enhanced DBS check. Checks will also be undertaken to confirm identity and if the individual lives or has lived outside of the UK, any such other checks as considered appropriate.

The EPA will also ensure that any Trustee/ Director is not subject to a section 128 direction that would prevent them from taking part in the management of an academy (as detailed in para 5.1 above).

## **12. Contractors**

Where we use contractors to provide services, we will set out our safeguarding requirements in the contract between the organisation and the EPA.

We will ensure that any contractor, or any employee of the contractor, who is to carry out work for the EPA has been subject to the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). 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 contact with children, an enhanced DBS check (not including barred list information) will be required. We will not keep copies of such checks for longer than 6 months.

Under no circumstances will a contractor in respect of whom no checks have been obtained be allowed to work unsupervised or engage in regulated activity.

We will always check the identity of contractors and their staff on arrival at school.

For self-employed contractors such as music teachers or sports coaches, employed in a primary school we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

## **13. Visitors**

We will check identification of professional visitors upon their arrival to school and ensure that they sign in and out of the building. Where applicable, we will check that the visitor has the appropriate level of DBS check.

We will use our professional judgment about the need to escort or supervise visitors on school site.

Whilst external organisations can provide a varied and useful range of information, resources and speakers that can help schools and colleges enrich children's education, careful consideration will be given to the suitability of any external organisations.

## **14. Alternative Provision**

If we place a student with an alternative provision provider, we continue to be responsible for the safeguarding of that student, and therefore need to be satisfied that the provider meets the needs of the student. We will obtain written confirmation from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e. those checks that we would otherwise perform in respect of our own staff.

## **15. *Adults who supervise pupils on work experience***

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

## **16. Pupils staying with host families**

Where an EPA school makes arrangements for pupils to be provided with care and accommodation by a host family to which they are not related (eg, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those people.

Where the school is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner schools abroad to ensure that similar assurances are undertaken prior to the visit.

## **17. Induction**

All new employees will be given an induction programme which will include systems within the school which support safeguarding.

This includes (but is not limited to):

- The safeguarding policy which should amongst other things also include the policy and procedures to deal with child on child abuse.
- The behaviour policy which should include measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying.
- The staff code of conduct policy which should, amongst other things, include low-level concerns, allegations against staff and whistleblowing.
- The safeguarding response to children who go missing from education.
- The role and identity of the Designated Safeguarding Lead (DSL) and any deputies.

All staff members will also receive appropriate safeguarding and child protection training which is regularly updated.

All staff will be required as part of their induction to read and understand at least Part One of Keeping Children Safe in Education 2022 statutory guidance.

## **18. Single Central Record**

A single centralised record is kept by each EPA school and by the EPA central team in accordance with the DfE requirements. This is kept up to date by the establishment's delegated member of staff and is retained securely. It contains the details of the following:

- All staff (including supply staff, teacher trainees on salaried routes and agency and third-party supply staff, even if they work for one day) who work at the school.
- Regular volunteers who are engaged in regulated activity.
- Governors.
- All members of the proprietor body, i.e. members and trustees of the EPA.

The information recorded on these individuals is whether or not the following checks have been carried out or certificates obtained, and the date on which the checks were completed:

- An identity check.
- A barred list check.
- An Enhanced DBS check requested/ certificate provided.
- A prohibition from teaching check.
- A S128 check (where applicable - see above).
- Further checks on people living or working outside the UK (see below).
- A check of professional qualifications, where required.
- A check to establish the person's right to work in the United Kingdom.
- Childcare disqualification declaration, where relevant.
- Online searches.

For supply staff, we will also include whether written confirmation (and the date) that the employment business supplying the member of supply staff has carried out the relevant checks and obtained the appropriate certificates.

A designated Governor is responsible for auditing the Single Central Record for each EPA school and reporting their findings to the full Governing Body at least annually. The EPA's Safeguarding Director is responsible for auditing the EPA's Single Central Record.

## 19. Record Retention

Copies of DBS certificates do not need to be retained as this is not a requirement of the duty to maintain the Single Central Record. Where we choose to keep a copy of the DBS certificate, we will record a valid reason for doing so and will not keep it for longer than 6 months.

A copy of the other documents used to verify the successful candidate's identity, right to work and required qualifications will always be kept for the personnel file.

Interview notes on unsuccessful applicants will be retained for a period of 6 months after which they will be destroyed.

## 20. Applications from Overseas Applicants

Individuals who have lived or worked outside the UK must undergo the same checks as all other staff in schools or colleges. In addition, schools and colleges must make any further checks they think appropriate so that any relevant events that occurred outside the UK can be considered.



The Home Office guidance on criminal records checks for overseas applicants can be found on GOV.UK.

These checks could include, where available:

- Criminal records checks 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 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. Applicants can also contact the UK Centre for Professional Qualifications who will signpost them to the appropriate EEA regulatory body. Where available, such evidence can be considered together with information obtained through other pre-appointment checks to help assess their suitability.

Where this information is not available schools and colleges should seek alternative methods of checking suitability and or undertake a risk assessment that supports informed decision making on whether to proceed with the appointment.

## **21. A Wider Culture of Vigilance**

The EPA is committed to providing the highest level of education and care to its pupils and to safeguarding and promoting the welfare of children and young people. It is recognised that safer recruitment does not end at appointment. We are committed to creating a 'safer culture' and will ensure the following:

- That there are clear procedures in place to monitor, support and review new entrants to the organisation.
- That there are clear procedures for reporting concerns.
- That any employee who reports a concern is supported in doing so and there is a clear commitment to taking appropriate action.

## **22. Other relevant policies and procedures**

- Child Protection and Safeguarding Policy
- Whistleblowing policy
- Code of Conduct
- GDPR Privacy policies

## Annex 1: Definition of Regulated Activity

*'Engaging in regulated activity'* means:

- being responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or
- carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or
- engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

## Annex 2: Policy Statement on the Recruitment of Ex-Offenders

### Exemption from the Rehabilitation of Offenders Act 1974

Ex-offenders have to disclose information about spent, as well as unspent convictions if the job for which they are applying is exempted from the Rehabilitation of Offenders Act 1974.

### How this affects school-based positions

All school-based roles are exempt from the Rehabilitation of Offenders Act as the work brings employees into contact with children who are regarded by the Act as a vulnerable group. Applicants for school-based jobs must, therefore, disclose all spent and unspent, unfiltered convictions.

All applicants who are offered employment in our organisation will be subject to a criminal record check from the Disclosure and Barring Service before an appointment is confirmed. This will include details of cautions, reprimands and warnings as well as spent and unspent, unfiltered, convictions.

An enhanced DBS (check) may also contain non-conviction information from local police records which a chief police officer thinks may be relevant.

Having a criminal record will not necessarily bar someone from working in our school.

Criminal records will be taken into account for recruitment purposes only when the conviction is relevant.

When reaching a recruitment decision the following factors will be taken into account:

- Whether the conviction or other matter revealed is relevant to the position in question
- The seriousness of any offence or other matter revealed
- The length of time since the offence or other matter occurred
- Whether the applicant has a pattern of offending behaviour or other relevant matters
- Whether the applicant's circumstances have changed since the offending behaviour or the other relevant matters, and
- The circumstances surrounding the offence and the explanation(s) offered of the offending person.

As an organisation assessing applicants' suitability for positions which are included in the Rehabilitation of Offenders Act 1974 (Exceptions) Order using criminal record checks processed through the Disclosure and Barring Service (DBS), we comply fully with the DBS [code of practice](#) and undertake to treat all applicants for positions fairly.

We undertake not to discriminate unfairly against any subject of a criminal record check on the basis of a conviction or other information revealed.

We can only ask an individual to provide details of convictions and cautions that we are legally entitled to know about. Where a DBS certificate at either standard or enhanced level can legally

be requested (where the position is one that is included in the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 as amended, and where appropriate Police Act Regulations as amended).

We can only ask an individual about convictions and cautions that are not protected.

We are committed to the fair treatment of its staff, potential staff or users of its services, regardless of race, gender, religion, sexual orientation, responsibilities for dependants, age, physical/mental disability or offending background.

We have this written policy statement on the recruitment of ex-offenders, which is made available to all DBS applicants at the start of the recruitment process.

We actively promote equality of opportunity for all with the right mix of talent, skills and potential and welcome applications from a wide range of candidates, including those with criminal records.

We select all candidates for interview based on their skills, qualifications and experience.

All application forms, job adverts and recruitment briefs will contain a statement that an application for a DBS certificate will be submitted in the event of the individual being conditionally offered the position.

We ensure that all those in the organisation who are involved in the recruitment process have been suitably trained to identify and assess the relevance and circumstances of offences.

We also ensure that they have received appropriate guidance and training in the relevant legislation relating to the employment of ex-offenders, e.g. the Rehabilitation of Offenders Act 1974.

At interview, or in a separate discussion, we will ensure that an open and measured discussion takes place on the subject of any offences or other matter that might be relevant to the position. Failure to reveal information that is directly relevant to the position sought could lead to withdrawal of an offer of employment.

We make every subject of a criminal record check submitted to DBS aware of the existence of the [code of practice](#) and makes a copy available on request.

We undertake to discuss any matter revealed on a DBS certificate with the individual seeking the position before withdrawing any conditional offer of employment.

## Annex 3: Online Search Record

In line with Keeping Children Safe in Education 2022, online searches will be undertaken for all prospective shortlisted candidates. The template below includes suggestions for the most common platforms searched.

**Candidate Name:**

**Role Shortlisted for:**

**Searcher Name/ Position:**

**Date and Time of Online Search:**

Search Parameters	Concerns Raised
<p>Google Search: Look at the following terms, look at the first page of results:</p> <ul style="list-style-type: none"> <li>• Candidates name</li> <li>• Candidates name + current school/employment</li> <li>• Candidates name+ previous school/employment</li> <li>• Candidates name + educational institution</li> <li>• Candidates name + job title</li> </ul> <p>Websites: The candidates name was typed into the search functions of the following websites (delete as applicable):</p> <ul style="list-style-type: none"> <li>• LinkedIn (checked the top 10 results)</li> <li>• Twitter (checked the top 10 results)</li> <li>• Facebook (checked the top 10 results)</li> <li>• Instagram (checked the top 10 results)</li> <li>• TikTok (checked the top 10 results)</li> <li>• YouTube (checked the top 10 results)</li> <li>• Their current school website</li> </ul>	<p><i>Only record information that suggests the candidate:</i></p> <ul style="list-style-type: none"> <li>• <i>Is unqualified for the role</i></li> <li>• <i>Poses a potential safeguarding risk</i></li> <li>• <i>Risks damaging the reputation of the school</i></li> </ul> <p><i>Don't include any irrelevant personal information</i></p>