



Safer Recruitment Policy

1. Contents

1.	Contents	2
2.	Version control.....	3
3.	Introduction.....	4
4.	Legal framework	4
5.	Roles and Responsibilities	5
6.	Planning, advertising and shortlisting.....	6
7.	Interview to interview	7
8.	Requesting references.....	8
9.	Checking References.....	8
10.	Providing References.....	9
11.	Content of references	10
12.	Previous disciplinary action.....	10
13.	Use of data and confidentiality	11
14.	Online searches on shortlisted candidates.....	11
15.	The Interview	12
16.	Pre-appointment checks	13
17.	Right to work checks.....	15
18.	Identification checking process	15
19.	After the pre-appointment checks	16
20.	Single central record (SCR)	16
21.	Safer recruitment training.....	17
22.	Monitoring and Review	17
	Appendix 1: Policy Statement on the Recruitment of Ex-Offenders	18

2. Version control

Date	Version	Revision	Owner
31/10/20	1.0	Policy migrated from a Staffordshire County Council's policy with Insight HR input.	Future Generation Trust Policy Team
28/01/21	2.0	Policy amended post EU Exit.	Future Generation Trust Policy Team
29/11/21	3.0	Annual review of policy to include updates to ensure the policy is in line with Keeping Children Safe in Education 2021.	Future Generation Trust Policy Team
13.03.23	4.0	Review of policy to include updates to ensure the policy is in line with Keeping Children Safe in Education 2022.	Future Generation Trust Policy Team

3. Introduction

Future Generation Trust has implemented this policy to assist with recruitment and employee selection. It outlines the trust's recruitment procedure and how the academies ensure safer recruitment is considered at all levels of the recruitment process.

The safety and protection of pupils is always at the forefront of the trust's concerns, which is why this policy aims to embed a robust safeguarding culture into the recruitment practices of academies.

4. Legal framework

This policy has due regard to all relevant legislation including, but not limited to, the following:

- Rehabilitation of Offenders Act 1974
- Children Act 1989
- Education Act 2002
- Sexual Offences Act 2003
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- Education and Skills Act 2008
- The School Staffing (England) Regulations 2009
- Equality Act 2010
- The Education (School Teachers' Appraisal) (England) Regulations 2012 (as amended)
- The UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Amendments to the Exceptions Order 1975, 2013 and 2020

This policy has due regard to guidance including, but not limited to, the following:

- DfE (2020) 'Governance handbook'
- DfE (2020) 'Changes to checks for EU sanctions on EEA teachers from 1 January 2021'
- DfE (2021) 'Staffing and employment advice for schools'
- DfE (2021) 'Basic check ID checking guidelines from 1 July 2021'
- DfE (2021) 'Right to work checks: employing EU, EEA and Swiss citizens'
- DfE (2022) 'Keeping children safe in education 2022' (KCSIE)
- DfE (2022) 'Recruit teachers from overseas'
- Disclosure & Barring Service (2018) 'Regulated activity with children in England'
- Home Office (2022) 'Employer's guide to right to work checks'
- Safer Recruitment Consortium (2022) 'Guidance for safer working practice for those working with children and young people in education settings'

This policy operates in conjunction with the following academy policies:

- Child Protection and Safeguarding Policy
- Complaints Procedures Policy
- Records Management Policy
- Data Protection Policy

5. Roles and Responsibilities

The Trust Board is responsible for:

- All matters relating to the appointment of a headteacher

The Local Governing Body (LGB) is responsible for:

- Agreeing and monitoring effective policies to ensure recruitment at the academies are in accordance with the legislation outlined above.
- Ensuring that staff recruitment is as safe as possible, as well as fair and compliant with the relevant legislation.
- Ensuring appropriate checks have been carried out on staff, volunteers, contractors and agency workers working within the academy.
- Appointing an appropriate recruitment panel and ensuring that where possible they have undertaken unconscious bias training and that at least one member has undergone safer recruitment training.
- Ensuring that all members of the recruitment panel are familiar with their obligations with regards to safer recruitment, as set out in KCSIE.
- Monitoring the academy's SCR to ensure that the necessary vetting checks for employees are carried out.
- Ensuring that equal opportunities are established and implemented throughout the recruitment process.
- Ensuring that the salary of the successful candidate is determined.

The recruitment panel is responsible for:

- Appropriately delegating responsibility for recruitment to the headteacher.
- Creating the advert and ensuring it meets all the necessary requirements.
- Shortlisting the potential candidates with the aim of reducing the application field and identifying those with the potential to effectively undertake the role.
- Setting appropriate recruitment procedures, as per the scheme of delegation.
- Ensuring that the interview addresses, team working skills, integrity, understanding of the academy's ethos and vision, and why the candidate believes they would be a good fit for the academy.
- Ensuring that the interview addresses safeguarding practices.
- Ensuring that references have been received where requested.
- Asking previous employers of new staff members whether the individual has been subject to capability procedures in the previous two years.

The headteacher is responsible for:

- Managing the entire recruitment process.
- Ensuring appropriate checks have been carried out on prospective staff, volunteers, contractors and agency workers working within the academy.
- Ensuring that appropriate supervision of employees and volunteers is organised, and for promoting the safety and wellbeing of pupils generally and throughout the recruitment process.
- Leading the interview when the candidate is at a lower level.

- Ensuring that the successful candidate receives the appropriate training, e.g. safeguarding and induction.
- Ensuring that all relevant staff members are familiarised with this policy.

6. Planning, advertising and shortlisting

The job information and associated documents will be published online. The full requirements of the role will be clearly explained, including any employment vetting requirements such as a DBS check.

The LGB and headteacher will:

- Decide on the recruitment timeframe.
- Decide who will be involved in the process and what their roles will be, e.g. who forms the recruitment panel and who will lead interviewing.
- Use the standard FGT information documents as a template for information that will be provided to candidates, including the job description, person specification and application form – ensuring that these documents contain a clear message about safeguarding, the checks that will be carried out and that references will be sought.
- Ensure that application packs, where relevant, state that candidates must be willing to sign a self-declaration form to obtain information about staff disqualification, in line with the Childcare Act 2006.

Advertisements will include:

- A statement of the academy's commitment to safeguarding and promoting the welfare of pupils whilst making clear that safeguarding checks will be undertaken.
- The safeguarding responsibilities of the post as per the job description and person specification.

Vacancies will be advertised through external media, such as WM Jobs and both the academy and trust websites, ensuring that the advertisement reaches a wide range of groups. Advertisements will contain a statement of commitment to ensuring equal rights. Advertisements will include, or link to, a job description, person specification and detail the closing date. The contact number of the appointing officer and details of the application process will be clearly outlined.

Application forms will be accessible on the academy's and trust's website.

The academy may utilise social media for recruitment, and if doing so, will create a social media recruitment strategy to ensure that the advertisement is reaching the right people and is communicating the ethos of the academy effectively.

When an advert receives a response, the recruitment panel will ensure that candidates receive the application pack.

Application forms

Applicants will be required to provide the following:

- Personal details, e.g. their current and former names, current address, and national insurance number

- Details of their current or most recent employment, including the reason for leaving
- Full employment history, including explanations for any gaps in their employment
- Qualifications, the awarding body and the date of the award
- Details of references
- A statement of their personal qualities and an explanation of why they meet the person specification to be a suitable candidate for the role
- A declaration form outlining whether they are barred from teaching

The academy will only accept a CV alongside a completed application form; a CV on its own will not be accepted. When shortlisting candidates for an interview, all application forms will be considered. Shortlisting criteria will be agreed in advance by the recruitment panel.

Candidates who are shortlisted will meet all the essential aspects of the person specification requirements. The academy will ensure that the shortlisting process is as systematic as possible, and that the recruitment panel reads through all applications.

Shortlisting

Shortlisted candidates will be asked to complete a self-declaration of their criminal record or disclosure of any information making them unsuitable to work with children.

Only those candidates who have been shortlisted will be asked to disclose any relevant information including:

- Information of any criminal offences committed.
- If they are known to the police and children's social care services.
- Whether they have been disqualified from providing childcare.
- Any relevant overseas information.

Applicants will need to sign a declaration which confirms that the information they have provided is true.

When shortlisting candidates, the academy will:

- Ensure that at least two people carry out the shortlisting proceedings – ideally, these two people will also conduct the interview.
- Assess whether there are any inconsistencies or gaps in the candidate's employment and consider the reasons given for them.
- Explore any further potential concerns.

Requests for further information from candidates will be replied to promptly. All applications will be replied to with a letter notifying candidates whether they have been shortlisted or not.

Interviews will be arranged for the shortlisted candidates.

7. Interview to interview

Once a shortlist has been confirmed, the agreed candidates to be invited for interviews. They will be provided with information about the interview arrangements, how they will be conducted, the areas that will be explored and what documents they should bring.

8. Requesting references

Once a candidate, including an internal candidate, has been shortlisted for a position, references will be requested and scrutinised by the recruitment panel. Any concerns will be resolved satisfactorily prior to confirming an appointment. References will always be requested directly from the referee and from a senior person with appropriate authority, rather than a colleague. The academy's standard request form will always be used to obtain references.

References will be requested in written form from the candidate's current employer – if they are unemployed, verification of their most recent period of employment and reasons for leaving will be obtained from their previous employer. Wherever possible, at least one reference will be from employment through which the candidate worked with children. If the reference is school/college based, the reference should be confirmed by the headteacher/ principal.

If the applicant has never worked with children, the academy will ensure that a reference from their current employer is received.

If the candidate is a school leaver or has not been in work for over two years, a character reference will be requested.

When a candidate is applying for a teaching role (including the role of headteacher), information about the details of any capability procedures in the **previous two years** that they may have been subject to, and the reasons for these, will be requested from their current or former employer.

Concerns raised following a candidate's references will be explored further with the referee where appropriate and discussed with the candidate at interview.

Open references, e.g. 'to whom it may concern' testimonials, and unverified information provided by the candidate as part of the application process, will be considered alongside requested references. Electronic references will be checked to ensure that they originate from a legitimate source.

If the candidate is not currently working with children but has done so in the past then a reference should be secured from this employer also.

9. Checking References

References will be checked upon receipt to ensure that all questions have been answered satisfactorily and that information is not contradictory or incomplete. The referee will be contacted to provide further clarification where appropriate, e.g. if some answers are vague or insufficient, or contradictory information has been provided. The reference will be compared for consistency with the information on the candidate's application form. Discrepancies between the reference and the application form will be discussed with the candidate at interview.

Where a reference appears incomplete or other concerns arise, the academy will carry out one of the following actions:

- Call the referee to discuss the reference further
- Email the referee the reference for confirmation of its accuracy

The recruitment panel will ensure that any past disciplinary action or allegations disclosed as part of a reference are considered carefully when assessing the candidate's suitability for the role. If this involves safeguarding or potential safeguarding concerns, the DSL will be consulted to help assess the candidate's suitability.

Before making a decision not to appoint a candidate based on an unsatisfactory reference, the recruitment panel will consider if HR advice is necessary. Once the decision is made, the headteacher will record this on the recruitment file as the reason for non-appointment.

All members of staff who provide a reference will be responsible themselves for checking the content to ensure that it only contains factual and verifiable statements. If there is any doubt about whether to include information, caution will be exercised and it will be omitted. Alternatively, advice will be sought from a senior figure, e.g. the headteacher or the chair of governors.

10. Providing References

References will only be provided once written consent has been obtained from the person requesting a reference.

The member of staff providing a reference will follow this policy's procedures and the prospective employer's requests as much as is reasonably possible, e.g. if a pro-forma is provided, they will complete the form. If the reference is not requested in a specific format, the member of staff will decide the most appropriate method, e.g. a pro-forma or a letter-formatted reference.

The headteacher will decide in exceptional circumstances if a reference cannot be provided or if certain questions asked by the prospective employer cannot be answered, with HR advice sought when appropriate.

Staff members will make the headteacher aware when they have been asked to provide a personal reference, e.g. for a current or former colleague. The staff member will make it clear within the reference that it is a personal one and is not written for or on behalf of the academy. The staff member will use their own paper or an email address unaffiliated with the academy and ensure that the reference is not linked to the academy in any way.

Details of any capability procedures in the **previous two years** for a teacher (including headteacher) or former teacher at the academy, and the reasons for these, will be provided if requested.

If, as part of a settlement agreement, the academy has agreed to provide a reference for a member of staff, the headteacher will ensure it is provided in line with the agreement and this policy. In circumstances where new evidence emerges that indicates information provided in the reference is incorrect, the headteacher will decide if the reference is changed or withdrawn, with legal advice sought where necessary, and will notify the employee of any decision first.

The academy will ensure that any information provided confirms whether they are satisfied with the applicant's suitability to work with children, and only provide the facts of any substantiated safeguarding concerns or allegations, including a group of low-level concerns about the same individual, that meet the harm threshold.

Any repeated concerns or allegations which do not meet the harm threshold which have been found to be false, unfounded, unsubstantiated, or malicious will not be included in any reference.

11. Content of references

Basic information will always be expected in references received and provided, e.g. skills, knowledge, duties undertaken, experience working with children, and personal characteristics, in addition to any information relating to safeguarding. Further relevant comments will be made as much as is reasonably possible in line with the employer's requests, provided they are verifiable and objective, e.g. through appraisals or attendance records.

References will contain only factual and verifiable information and will not include speculation, e.g. about a former employee's suitability for a job, or hearsay. The person providing the reference will ensure all comments have a factual basis and that an impression is not given which is misleadingly positive or negative. Performance issues or concerns which have not been discussed or raised with the employee beforehand will not be mentioned.

All members of staff providing references will be made aware that information provided verbally to the prospective employer is subject to the same duties as written information and will avoid making verbal statements. Where it is necessary or appropriate, verbal information will be provided only in line with this policy's procedures, e.g. all statements must be verifiable and objective.

12. Previous disciplinary action

The recruitment panel will ensure that any references requested by the academy include a section asking for any past disciplinary action or allegations to be disclosed. Any disclosures will be carefully considered when assessing the candidate's suitability for the role, in line with this policy.

Information from DBS checks will not be included in references provided by the academy. Information regarding criminal offences from other sources will not be included, unless the headteacher deems it appropriate and HR advice has been sought.

When providing references, the disclosure of information about past disciplinary action or allegations not relating to safeguarding will be provided where it is deemed appropriate, e.g. it is relevant to the staff member or former staff member's suitability for the role. Information relating to disciplinary action will generally only be disclosed if penalties or sanctions remain in place for the employee.

Allegations which were proven to be false, unsubstantiated or malicious, e.g. relating to misconduct, will not be included in a reference – this includes if it is a history of repeated concerns or allegations which have been found to be false, unsubstantiated or malicious. The member of staff providing the reference will make no comments about their own personal views on the veracity of allegations.

If an allegation exists which has yet to be investigated or an investigation is incomplete, the headteacher will seek HR advice, and legal advice where necessary, on what information, if any, should be provided to the prospective employer.

13. Use of data and confidentiality

Personal data relating to references will be handled in line with the Data Protection Policy. All references will be properly addressed and marked private and confidential.

In accordance with the Data Protection Act (2018) and the UK GDPR any personal information will be processed fairly and lawfully, and will be kept safe and secure e.g. in locked, non-portable containers or, for electronic information, password protected. Access will be strictly controlled and limited to those who are entitled to see it as part of their duties.

Information relating to an individual's health and sensitive personal data, e.g. information relating to the individual's ethnicity, religion or trade union membership, will not be disclosed as part of a reference unless 'express consent' has been received from the individual for this purpose.

The person requesting a reference will be offered the opportunity to see it before it is sent, unless the headteacher decides this is not appropriate; however, the academy is aware that ultimately, they cannot prevent the person receiving a copy in line with the Data Protection Act. If the person raises comments about the reference before it is sent, the member of staff responsible for the reference will consider the comments and, if they decide to leave it unchanged, record the reason(s) behind their non-agreement.

14. Online searches on shortlisted candidates

The academy is committed to ensuring that safeguarding is a top priority; therefore, in line with KCSIE, the academy will consider carrying out online searches on shortlisted candidates as part of their due diligence. Online searches solely aim to help identify any incidents or issues that have happened, and are publicly available online, which the academy may want to explore with the applicant at interview.

Online searches will be conducted on shortlisted candidates only, and only where the academy considers this appropriate. The academy will consider any potential risks of online searches, e.g. unlawful discrimination or invasion of privacy, and will be clear on the reasons that online searches are being conducted. Online searches will only examine data that is publicly available.

Online searches will be carried out by an individual who is independent of the recruitment process to minimise the risk of bias or discrimination and to ensure that only relevant information is considered. The person responsible for carrying out online searches will have due regard to Part three of KCSIE.

When carrying out searches of shortlisted candidates' online presence, the academy will look out for indicators of concern, such as:

- Inappropriate behaviour, jokes or language.
- Discriminatory comments.
- Inappropriate images.
- Drug or alcohol misuse.
- Anything that suggests the candidate may not be suitable to work with children.

Any concerns will be addressed during the interview process. The academy will ensure that candidates are given an opportunity to discuss any concerns raised by the online search.

15. The Interview

During the interview process, candidates will be asked standard questions and their responses will be recorded for ease of comparison by a designated note-taker on the interview panel. Any concerns raised through contact with referees will be discussed with the candidate at this stage. The recruitment panel will ask open questions to assess the candidate's experience and suitability for the post, and to explore the candidate's motivation towards safeguarding and their suitability to work with children. The academy will use a range of selection techniques to identify the most suitable person for the post.

Interview questions seek to:

- Find out what attracted the candidate to the post being applied for and their motivation for working with children.
- Exploring their skills and asking for examples of experience of working with children.
- Looking at any gaps in employment or where the candidate has changed employment or location frequently and asking about the reasons for this.
- Seek examples of the candidate's previous experience.

After the interview has been completed, the recruitment panel will:

- Assess all candidates' performance using the same agreed criteria.
- Ask the successful candidate to provide proof of identification and qualifications for the academy's records, and to complete the DBS check as soon as possible.
- Contact and provide feedback to the unsuccessful candidates – feedback will be verbal and based on evidence of their performance against the person specification for the role.

Interview notes and assessment materials will be held securely for an appropriate amount of time after the interviews, in line with the Records Management Policy, in case any aspect of the recruitment process is challenged.

After choosing a successful candidate, the academy will:

- Make a conditional offer of employment to the candidate.
- Ask the successful candidate to provide identification and proof of qualifications, if this has not already been done.
- Complete the relevant pre-appointment checks.

Any spent or filtered convictions declared on the candidate's self-declaration form, or declared at interview, will not affect the offer of employment if already made; however, the academy will undertake the relevant assessments to determine whether the candidate is suitable to work in the academy.

16. Pre-appointment checks

All appointments will be conditional on satisfactory completion of the necessary pre-appointment checks. These checks seek to identify whether there is anything that would make the candidate an unsuitable appointment for working with children or as a teacher.

When appointing new staff, the academy will:

- Verify the candidate's identity, e.g. checking the name and birth date on a birth certificate and verifying any name changes.
- Obtain an enhanced DBS check via the candidate and, for candidates engaging in regulated activity, barred list information.
- Obtain a separate children's barred list check if the individual will start work in regulated activity with children before the DBS certificate is available.
- Verify the person's right to work in the UK.
- Make further checks as appropriate on any individual who has lived or worked outside the UK.
- Verify professional qualifications, as appropriate.
- Ensure that appropriate checks are carried out to ensure that individuals employed to work in Reception classes, or in wraparound care for children up to the age of 8, are not disqualified from working in these settings under the 2018 Childcare Disqualification Regulations.
- For those in management, trustee or governor roles, conduct a section 128 check.

The recruitment panel will ensure any candidate employed to carry out teaching work is not subject to a prohibition order, or any sanction or restriction imposed (that remains current) by the GTCE before its abolition in March 2012.

The recruitment panel will assess all cases fairly and on an individual basis. Where a decision has been made not to appoint somebody because of their convictions, it will be clearly documented to enable the academy a chance to defend its decision if challenged.

The academy will consider the following when assessing any disclosure information on a DBS certificate:

- The seriousness and relevance to the post which they have applied to
- How long ago the offence occurred
- The country where the offence occurred
- Whether it was a one-off incident or a history of incidents
- The circumstances around and at the time of the incident
- Whether the individual accepted responsibility for what happened
- Whether the offence has been decriminalised

If the academy has reason to believe that an individual is barred, it is an offence under section 9 of the Safeguarding Vulnerable Groups Act (SVGA) 2006 for the academy to allow the individual to carry out any form of regulated activity.

Checks for all prohibitions, directions, sanctions and restrictions will be carried out by using the secure access portal on the Teacher Services' [web page](#).

In line with KCSIE, the academy will not require candidates to have an enhanced DBS certificate or undergo checks for events that may have occurred outside the UK if, in the three months prior to their appointment, the candidate has worked in England in a post:

- In an academy which brought them into regular contact with children or young people; or
- In an academy since 12 May 2006 which did not bring the person into regular contact with children or young people;

This is because the candidate will have already undergone this process in their previous position.

Volunteers

For all volunteers, the academy will undertake a written risk assessment and use professional judgement and experience when deciding what checks, if any, will be required.

All unsupervised volunteers engaging in regulated activity will be required to provide the academy with an enhanced DBS check with a barred list check. Existing volunteers in regulated activity do not need to be re-checked if they have already had a DBS check (including barred list information); however, the academy may decide to conduct a repeat DBS check.

Candidates who have lived outside the UK

[The Teaching Regulation Agency no longer maintains a list of EEA teachers with sanctions. Schools must continue to carry out safer recruitment checks on all candidates and must make any further checks they think relevant.]

For candidates who have lived outside the UK, all mandatory checks outlined in this policy will be carried out, along with additional checks where necessary, including an enhanced DBS certificate with barred list information for those engaging in regulated activity, even if they have never been to the UK before.

The academy will make any further checks that it deems appropriate so that any relevant events occurring outside the UK can be considered, e.g. obtaining proof of past teaching conduct for any candidate for a teaching position from the professional regulating authority in the country in which they worked, where available.

If a candidate is unable to provide the correct documentation, they cannot submit a DBS check. This is because the right to work in the UK cannot be established.

Following the UK's exit from the EU, schools and colleges should 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.

Agency staff

In the case of any employee working at the academy who is sourced from an agency or third-party organisation, the academy will obtain written notification from the organisation confirming that they have carried out the same checks as the academy would otherwise perform on any individual who will be working at the academy, or who will be providing education on the academy's behalf, including through online delivery. Confirmation will also be obtained that the individual who presents for work is the same person on whom all checks have been completed. A copy of photographic identification will generally be kept where appropriate.

The academy will obtain a copy of the enhanced DBS certificate from the agency or third-party organisation where it has been obtained before the person is due to commence work and has disclosed any matter or information.

Governors

The LGB may request an enhanced DBS certificate without a barred list check on an individual as part of the appointment process for governors. An enhanced DBS certificate (which will include a barred list check) will only be requested if the governor will be engaging in regulated activity; this also applies to volunteer governors.

Associate members will not be asked to undertake a DBS check.

Trustees and members will be subject to a section 128 check.

Newly appointed chairs of trustees will be subject to a suitability check, which includes:

- An identity check.
- Confirmation of the right to work in the UK.

17. Right to work checks

[EU, EEA, or Swiss citizens need to provide evidence of lawful immigration status in the UK. Individuals from these areas will not be able to use their passport or national ID as proof of right to work. Schools will need to check candidate's right to work online. The UK operates a points-based immigration system which affects how schools employ teachers who are not UK or Irish nationals. All overseas nationals, including those from the EEA and Switzerland, arriving in the UK from 1 January 2021 come under the new system.]

The academy will obtain evidence that all candidates for a position have the right to work in the UK by using the government's [online portal](#). This will be done before a candidate is offered a position.

The academy will obtain proof of candidates' immigration status in the UK.

The academy will not make assumptions about a person's right to work in the UK, or their immigration status, on the basis of their race, ethnicity, nationality, length of residence in the UK or background. All candidates, including British citizens, will have their right to work in the UK checked.

Where a candidate's right to work is time-limited, the academy will conduct a follow-up check in advance of its expiry.

The academy may use a certified digital identity service provider (IDSP) to conduct right to work checks on candidates.

18. Identification checking process

When checking the validity of identifying documents, the academy will ensure that this is done in the presence of the holder in person. The academy will be in physical possession of the original documents. The academy will only accept valid, current and original documentation in its physical form. The academy will not accept photocopies or documentation printed from the internet, e.g. internet bank statements.

The academy will request documents with photographic identity, such as a passport, and compare this against the candidate's likeness. The academy will not accept documents that are not in the candidate's current name as recorded on the application form.

The academy will always aim to check the name on the candidate's birth certificate in order to validate their identity.

The academy will ensure that all letters and statements provided by the candidate are recent e.g. within a three-month period.

The academy will keep a dated record of every document that has been checked for the duration of the candidate's employment and for a further two years after they have left the academy. This will be either as a hard copy or in a scanned PDF format.

In line with the UK GDPR and Data Protection Act 2018, the academy will only retain copies of DBS certificates where there is a valid reason for doing so, and only for as long as is needed to consider the information provided – this will not be for longer than six months.

When information is destroyed, the academy may keep a record of the fact that vetting was carried out, the result of this vetting, and the recruitment decision taken.

The academy may use a certified digital IDSP to secure DBS checks on candidates.

19. After the pre-appointment checks

Once the pre-employment checks have been completed,

- A start date with the candidate will be agreed
- Self-declaration forms will be destroyed
- Contractual paperwork will be submitted
- Required details of the checks carried out to the academy's SCR will be added

20. Single central record (SCR)

The academy will maintain and regularly update the SCR.

All new employees will be added to the record, which will include:

- All staff (including supply staff) who work at the academy.
- All others who work in regular contact with children in the academy, including volunteers.

The bullet points below set out the minimum information that must be recorded in respect of staff members (including teacher trainees on salaried routes). The record will indicate whether the following checks have been carried out or certificates obtained, and the date on which each check was completed or certificate obtained:

[Please note: for documents being viewed by the academy, the date recorded on the SCR should be the date the document was seen, rather than the date it was issued.]

- An identity check
- A barred list check
- An enhanced DBS check

- A prohibition from teaching check
- Further checks on people living or working outside the UK, including checks for European Economic Area (EEA) teacher sanctions and restrictions
- A check of professional qualifications
- A section 128 check
- A check to establish the person's right to work in the UK
- For those in management, trustee or governor roles, a section 128 check

For supply staff, the academy will include whether written confirmation has been received that the employment business supplying the member of supply staff has carried out the relevant checks and obtained the appropriate certificates, and the date that confirmation was received and whether any enhanced DBS check certificate has been provided in respect of the member of staff.

If checks are carried out on volunteers, this will be recorded in the SCR.

The MAT will not keep separate SCRs for each academy; however, it will ensure that all those who need to see the central SCR can easily do so and that the SCR can easily be filtered by academy.

The details of individuals will be removed from the SCR once their employment with the academy ends.

21. Safer recruitment training

At least one member of the recruitment panel will have completed formal safer recruitment training.

As a measure of good practice, the academy will ensure that this training is renewed **every five years**.

Staff and governors involved in the recruitment process will have an awareness of information regarding the following:

- The recruitment and selection process
- Pre-appointment and vetting checks, regulated activity and recording of information
- Other checks that may be necessary for, staff, volunteers and others
- How to ensure the ongoing safeguarding of children and legal reporting duties on employers

22. Monitoring and Review

The Future Generation Trust Board has overall responsibility for this policy and for reviewing its implementation and effectiveness.

Policy adopted on: 13th March 2023

Review date: March 2024

Signed: Fliss Dale

Designation: Chair of Trust Board

Appendix 1: 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 academy.

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.