

Safer Recruitment Policy and SOP



Lead Director

Mike Maddick, Director of Resources

Date Reviewed

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Lead Author(s),

Kirsten Mackison, Quality, Compliance & Safeguarding Manager
Paul Fix, Senior People Operations Manager

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Recommended By

Joanna Gillespie, Head of People & Culture

Endorsed Date

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Critical Readers

Claire Shiels, Head of Nursing & Care
Bethan Easton-Haskins, Director of Nursing & Quality
Launa Randles, Headteacher

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Finance Fundraising and General Purposes Committee

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Policy

1 Purpose and Objectives

The purpose of The Children's Trust's Safer Recruitment Policy is:

- To publicly demonstrate our commitment to safer recruitment
- To achieve safe procedures for the recruitment of staff/workers, temporary workers and volunteers (including Trustees & Governors)
- To ensure compliance with all statutory requirements and relevant recommendations and guidance, including the Code of Practice published by the Disclosure and Barring Service (DBS)
- To ensure that The Children's Trust meets its commitment to safeguarding and promoting the welfare of children and young people, by conducting all necessary pre-employment checks.
- To ensure that the best possible staff are recruited based on their merits, abilities and suitability for the position
- To ensure that all job applicants are considered equitably and consistently, in line with The Children's Trust Equity, Diversity & Inclusion Policy
- To ensure relevant staff and trustees receive training in safer recruitment processes
- To ensure all appointment panels contain at least one member who has been trained in safer recruitment

The objectives of the policy and this procedure are to:

- Establish and assign clear accountability for safer recruitment at TCT
- Ensure that all colleagues are aware of their individual responsibilities for safer recruitment
- Comply with regulations as outlined below
- Manage the safeguarding risk if safer recruitment and compliance is not followed

Relevant laws and regulations include but are not limited to:

- Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018
- Company Directors Disqualification Act 1986
- Disqualification from Caring for Children Regulations 2002
- Disqualification from Caring for Children Regulations 2002
- Education and Training (Welfare of Children) Act 2021
- Equality Act 2010
- General Data Protection Regulation (as implemented into UK law) and Data Protection Act (DPA) 2018
- Health & Social Care Act 2008 (Regulated Activities) Regulations 2014
- Keeping Children Safe in Education: Statutory guidance for schools and colleges, September 2023
- Non-maintained Special Schools regulations 2015
- Part V of the Police Act 1997
- Police Act 1997 (Criminal Record Certificates: Relevant Matters) (Amendment) (England and Wales) Order 2020
- Police Act 1997 (Criminal Records) Regulations 2002
- Protection of Freedoms Act 2012
- Rehabilitation of Offenders Act (ROA) 1974
- Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (as amended in 2013)
- Safeguarding Vulnerable Groups Act 2006

- Teachers' Disciplinary (England) Regulations 2012
- The Children's Homes (England) Regulations 2015
- Working together to Safeguard Children 2023

2 Scope

This policy applies to:

- All members of staff (including Bank workers) directly recruited and employed by The Children's Trust.
- Agency, self-employed contractors and any other temporary workers providing services to The Children's Trust. The Temporary & Visiting Workers Policy, and Disclosure & Barring Service (DBS) Checks Policy, should be referred to in conjunction with this policy, in order to inform processes when managing these categories of workers.

Volunteers providing workforce support or services are out of scope, for further information on the safer recruitment of these services please refer to the Volunteering Policy.

3 Definitions

Unless otherwise stated, the words or expressions contained in this document shall have the following meaning:

The Charity/ organisation/ TCT	The Children's Trust
SOP	Standard Operating Procedure
International Staff	Staff from overseas who are not citizens of the UK or Ireland

4 Policy Statement

- The Children's Trust is committed to ensuring that all recruitment procedures follow best practice, whilst ensuring that the organisation meets all legal and regulatory requirements (i.e. employment, safeguarding and privacy).
- This policy has been developed in accordance with the statutory requirements of the Health & Social Care Act 2008 (Regulated Activities) Regulations 2014, The Children's Homes (England) Regulations 2015, and the Department of Education's Keeping Children Safe in Education.
- Safeguarding and promoting the welfare of children and young people in our care is our highest priority. The Children's Trust aims to recruit staff that share and understand our commitment. We aim to provide a supportive and, where possible, flexible working environment for staff, in order to promote an engaged, motivated, and diverse workforce, comprising of different backgrounds, skills and abilities.
- The Children's Trust aims to ensure that no applicant is treated unfairly, throughout their application process, ensuring that it is efficient, effective, and equal and in accordance with the Recruitment of Applicants with a Criminal Record Policy and the Equity, Diversity & Inclusion Policy. We aim to uphold our legal obligations to ensure that no job applicant is treated unfairly by reason of a protected characteristic, as defined within the Equality Act 2010.
- Shortlisting, interviewing and selection will always be carried out without regard to protected characteristics including age, sexual orientation, marital status, disability, race, nationality, ethnic or national origins, religion, belief, transgender status or trade union membership.

- Reasonable adjustments at all stages of the recruitment process from application through to offer will be made, to ensure that no applicant is disadvantaged because of a disability.
- At all times, The Children's Trust aims to recruit the person most suited to the particular post. Recruitment decisions will be made solely based on the applicant's abilities and individual merit, as measured against set criteria. Qualifications, professional registration(s), experience, and skills will be assessed at the level that is relevant to the job.

5 Stakeholder Consultation

Appendix 1 details the stakeholders who were consulted in the development of this policy and procedure.

6 Related Policies and Procedures

The following policies and procedures stated below support the effective application of this policy and SOP:

- Data Protection Policy
- Disciplinary Policy
- Declarations Policy
- Disclosure & Barring Service (DBS) Checks Policy
- Equity, Diversity & Inclusion Policy
- Declarations Policy
- Occupational Health Policy
- People Privacy Policy
- Record Retention & Disposal Policy
- Recruitment of Applicants with a Criminal Record Policy
- Safeguarding Children, Young People & Adults at Risk Policy & Procedures
- Staff Handbook
- Temporary & Visiting Workers Policy
- Training & Development Policy
- Volunteering Policy
- Whistleblowing Policy

7 External References and Guidance

The following external resources and guidance were consulted in drafting this policy and SOP:

- Working Together to Safeguard Children: A guide to inter-agency working to safeguard and promote the welfare of children, 2023
- NACRO [Criminal Record Support Service](#)
- [Unlock](#)
- [DBS Filtering Guide](#)
- Xpert HR
- DfE Guidance: Recruit teachers from overseas
- Code of Practice for employers: avoiding unlawful discrimination while preventing illegal working
- Code of practice for the international recruitment of health and social care personnel in England
- Joint Council for the Welfare of Immigrants (JCWI) www.jcwi.org.uk

Standard Operating Procedures (SOP)

1 Roles and responsibilities

- Board of Trustees

The Board of Trustees is responsible for:

- ensuring that the policies and procedures in place for the safer recruitment of all staff, and anyone working on behalf of The Children's Trust, are in accordance with the relevant guidance.

- Line Manager

Line Managers are responsible for:

- complying with the Safer Recruitment Policy and Procedures at every part of the recruitment process
- obtaining the necessary approvals to recruit new staff or temporary workers
- recruiting their own staff, in conjunction with the People Team
- ensuring that temporary workers and volunteers are engaged in conjunction with the relevant policies and procedures

- Senior Management and all recruiting Line Managers

Senior Management and all recruiting Line Managers are responsible for:

- complying with the Safer Recruitment Policy and Procedures at every part of the recruitment process
- ensuring all staff, temporary workers and volunteers applying to work at The Children's Trust undergo appropriate checks that comply with Safer Recruitment
- promoting the welfare of children and young people at all stages of the process, as the primary driver of this policy

- Employees Involved in Recruitment and Selection of Staff

Employees involved in the recruitment and selection of staff are responsible for:

- complying with the Safer Recruitment Policy and Procedures at every part of the recruitment process

- People Team

People Team are responsible for:

- understanding and complying with the regulatory requirements relevant to safer recruitment
- complying with the Safer Recruitment Policy and Procedures at every part of the recruitment process
- providing advice and guidance to all those involved in the recruitment process
- arranging and administering all interviews and liaising with candidates throughout the recruitment and onboarding process.

2 Procedures

The Safer Recruitment Policy informs how we safeguard and promote the welfare of children and young people in our care, at every stage of the process, including: planning, deciding upon whether the post meets the criteria for 'regulated activity' and ensuring that the advertisement makes clear our commitment to safeguarding. The policy also details the full recruitment journey including authorisation, advertising, shortlisting, interviewing, appointing, onboarding / pre-employment checks (according to statutory requirements), induction, and ongoing employment.

The policy demonstrates a consistent and thorough process of obtaining, collating, analysing, and evaluating information from and about applicants.

A. Recruitment and Selection

2.1 Initiating and Authorising the Recruitment Process

Line Managers wishing to recruit must first consider whether the work can be covered in another way, for instance, distributing all or part of the duties amongst existing staff. Line Managers should then seek Director approval to replace the role or SLT approval for a new role. Once the role has been approved/budget agreed then the Line Manager must contact the Recruitment & Compliance Team to initiate the recruitment process.

2.2 Advertisement

This must include a statement about The Children's Trust's commitment to safeguarding and promoting the welfare of children and young people, whether the post is exempt from the Rehabilitation of Offenders Act 1974 and refer to the need for the successful candidate to undertake a Disclosure & Barring Service (DBS) check at the appropriate level (for further information, refer to the Disclosure & Barring Service Checks Policy). In addition it must state that, where a role involves engaging in regulated activity relevant to children or vulnerable adults, it is an offence to apply for the role if the applicant is barred from engaging in regulated activity relevant to children or vulnerable adults.

The advertisement will make no direct reference to age, sex, sexual orientation, marital or civil partnership status, disability, race, nationality, ethnic origin, religion, or belief as stated in the Equality Act 2010. However, it is acknowledged that by exception there may be a genuine occupational requirement for person(s) of a specific group to support a child or young person that cannot be achieved through other reasonable means. An objective justification will need to be completed and approved by the relevant Director and the Director of Resources before any advertising takes place.

To provide existing employees with the opportunity to apply, all roles will be advertised internally (for a minimum of five working days) via the Access Recruit portal, available on the Loop.

If a member of staff wishes to apply for a role, it is strongly recommended that they inform their current Line Manager of their intentions to do so, to promote an open and transparent working environment and recruitment process.

It is a requirement that members of staff inform their current Line Manager, before accepting the new internal offer of employment.

Posts may be advertised externally for a minimum of two weeks. This will be done via The Children's Trust's recruitment portal (Access Recruit), as well as identified and approved job boards, publications, journals, websites, social media, and other electronic means of communication.

Any paid advertisements must receive authorisation from the Senior People Operations Manager.

2.3 The Application Process

All applicants must complete The Children's Trust Online Application Form (except for those roles advertised on approved job boards (e.g., NHS Jobs). This provides consent for their personal details to be processed by The Children's Trust, under the People Privacy Policy, and in accordance with the UK General Data Protection Regulations (2018) and Data Protection Act (2018). Applicants may submit a CV to complement their application form; however, a CV on its own will not be accepted and as such, will not be considered for shortlisting.

As part of the application process, the following documents will be made available to candidates:

- The Children's Trust online application form
- Recruitment of Applicants with a Criminal Record Policy
- Information about self-disclosure of criminal information
- Information about the Child Protection and Safeguarding Policies & Procedures
- Internal candidates must complete The Children's Trust internal, online application form, available on the Loop
- Candidate briefing pack, including person specification
- An Equal Opportunities Monitoring Form (via the Access Recruit portal) details of which will be recorded separately and destroyed according to the *Record Retention & Disposal Policy*, and in accordance with the General Data Protection Regulations (2018) and Data Protection Act (2018)

2.4 Conflict of Interest

Candidates must declare any potential conflicts of interest on the application form. If a conflict of interest is identified, then this must be managed in accordance with the Declarations Policy.

2.5 Shortlisting & Selection

Immediately after the closing date, the recruiting Line Manager and interview panel members will be able to shortlist the applications received. Shortlisting must be undertaken by at least two people, who will be involved in the interview process and who are Safer Recruitment trained.

If a member of staff involved in the recruitment and selection process knows a candidate personally, they must disclose this as a conflict of interest as soon as they are aware and avoid any further involvement in the process.

Within two working days of the closing date the shortlisting panel must discuss and provide feedback either verbally or in writing to the Recruitment Lead on all candidates, confirming which candidates have been shortlisted for interview.

Non-shortlisted candidates should be contacted at the same time, via AccessRecruit, to advise them that they have been unsuccessful with their application.

2.6 Criminal Record Self-Disclosure Form (CRSDF)

Shortlisted candidates, including those applying via the NHS, will be sent the Criminal Record Self-Disclosure Form (Basic or Enhanced depending on their role) to complete and return to the Recruitment Lead before their interview. The purpose of a self-declaration is so that candidates will have the opportunity to share relevant information which will be discussed and considered at interview. The interview cannot be confirmed until this form is returned with a wet signature.

If an applicant for a role discloses a recent of serious offence against or involving children on the CRSDF Form and this is not recorded on the DBS certificate the organisation has an obligation to consult with the DBS to find out whether they wish to consider barring the person from working with children.

2.7 Online Searches

After shortlisting and prior to interview, applicants will undergo 'online searches' in accordance with Statutory Guidance. The online searches will be conducted by a person who is independent of the interview and selection process and will focus on relevant information returned via searches of the candidate's name (and variations thereof). Social media searches will be limited to professional platforms such as LinkedIn. Any concerns relating to suitability for work with children and young people will be forwarded to the interview panel in an interview addendum form, for discussion during the interview.

2.8 Interview

The Recruitment & Compliance Team will arrange and administer all interviews and liaise with candidates throughout this process. The Recruitment Leads will support and review all necessary interview packs prior to the interview (unless separate arrangements have previously been agreed locally).

Interviews should be carried out in accordance with current regulations and statutory guidance including the requirements for Safer Recruitment training for members of the interview panel. The interview should fully explore the candidate's suitability to work with children and young people, as well as their suitability for the role.

All candidates will be asked the same questions as they appear on the interview questions template, with summary notes of replies recorded. In addition, they must be asked questions relating to safeguarding to determine their suitability to work with children and young people. For school posts, candidates will be asked about their reason for applying for the role.

Where concerns have been highlighted following the online search process, the interview panel must use the interview questions addendum to explore those concerns with the applicant.

For positive DBS disclosures, the risk assessment meeting will take place separately to the interview, and once the DBS certificate has come back, in accordance with the DBS Checks Policy and the Recruitment of Applicants with a Criminal Record Policy.

Travel expenses will not be reimbursed for candidates; however, the Recruitment & Compliance Team will ensure that parking spaces are booked for those candidates traveling by car. Should a candidate have a reasonable request to support with travel costs, then this will be considered on a case-by-case basis by the Senior People Operations Manager.

2.9 The Children's Trust School - Interview Arrangements

All roles within The Children's Trust School require a completed application form, to be considered for shortlisting; a CV may also be included to complement the application form but will not be accepted on their own.

Due to regulatory requirements, The Children's Trust School should request and obtain two professional references for each shortlisted candidate, **prior to interview** and ordinarily, one of these should be from the individual's current and/ or most recent employer.

If a candidate does not provide their consent for a reference to be obtained from their current employer at this stage, the individual must write a letter of explanation to the Headteacher for their consideration.

In addition to the above, candidates shortlisted to interview at The Children's Trust School must bring original copies of all relevant qualifications and Professional Registrations, along with photographic proof of identification, when attending their interview.

2.10 Job Offers - across the Organisation

Offers of employment must not be made at interview.

In agreement with the recruiting Line Manager, the Recruitment & Compliance Team will make a verbal job offer and agree a provisional start date, considering all required pre-employment checks and Induction programme dates. To do this, the Recruitment & Compliance Team will require written confirmation of the offer details, from the recruiting Line Manager (via email).

The Recruitment & Compliance Team or Line manager (where applicable) will also contact the unsuccessful candidates, providing feedback where requested.

Should the successful candidate not accept the offer of employment, the Recruitment & Compliance Team will contact the recruiting Line Manager, to ascertain whether the role should be offered to the second-choice candidate, or whether the role will need to be re-advertised.

B. Onboarding and Pre-employment Checks

No employee may start work at The Children's Trust until all pre-employment checks have been satisfactorily completed.

In exceptional circumstances, where the business need may be deemed critical, a member of staff who is not to be employed in regulated activity (i.e. not child or adult facing) may be able to commence work remotely prior to the completion of the DBS process, if all other pre-employment checks have been satisfactorily completed. Refer to the DBS Policy for further information.

2.11 Pre-Employment Checks

All pre-employment checks must be carried out by the Recruitment & Compliance Team, and a list of checks is in Appendix 2. Additional checks required for SLT/Trustees are outlined in Appendix 3. Further guidance and detail on all aspects of checks can be found within the People Team's Compliance Manual.

2.12 Internal Moves

The Recruitment and Compliance Leads must check whether a different workforce or level of DBS check is required when staff change roles, and if necessary, a new DBS check must be applied for and completed before commencing the new role.

If the DBS check has 3 months or less before it expires a new DBS check or check of the Update Service will be required. For further information please refer to the DBS policy

The Compliance Lead will verify that all other compliance is up to date, ensuring that the employee file meets the current recruitment or regulatory thresholds. This will include checking that all historic references are in place for instances of working with children and vulnerable adults. In addition, an employment history must be on file, and an online search conducted. Where there is a substantial change, for instance an individual moving from a desk-based role to a child facing role, a new pre-employment health questionnaire must be completed for assessment by the Occupational Health Advisor .

2.13 Break in Service

Where staff leave TCT and then wish to return for a new role, with a break of less than twelve months, The Children's Trust will need to repeat at least part of the pre-employment checking process depending on the situation, for instance, obtaining references covering the break period and also any historic references that may be required for instances of work with children and young people in the past. Should the terms of the individual's role remain the same (i.e. there are no changes to the role or responsibilities that would trigger any new employment checks) then the Recruitment &

Compliance Team will review and verify the information they already hold meets the current recruitment or regulatory thresholds including right to work checks.

The People Team must take the opportunity to verify that all details recorded about the individual on SelectHR are up-to-date, and that there is no relevant information on their personnel record that may need to be considered against their suitability for the role. They must also ensure that there remains a record of every check conducted.

If the individual is on the DBS Update Service then a new DBS check will not be needed and a check of the Update Service will suffice (provided that The Children's Trust has seen the original DBS certificate and it is the correct level and barred lists for the role). If the individual is not on the DBS Update Service then a new DBS check will be required if there has been a break in service of **three** months or more.

If the individual returns and is employed on a contract with different terms (or moves into a different role) all the above still apply but some of the checks will need additional consideration, such as:

- the level/type of DBS check (eligibility for the role)
- qualification and registration requirements.

Staff whose break in service is greater than 12 months will be treated as a new starter and will undergo full compliance checks in accordance with Section 2.11.

In all instances, regardless of the length of the break in service, a pre-employment health questionnaire form must be completed and assessed by the Occupational Health Advisor.

2.14 Bank staff

Bank staff who have not worked for The Children's Trust for a six-month period, will be contacted in writing, by their Line Manager, after five months of being inactive to advise them that The Children's Trust intends to remove them from the Bank Service. If they then wish to re-join The Children's Trust at a later date, they will be required to re-apply and have their pre-engagement checks carried out once again to ensure that they meet all current regulatory and recruitment thresholds.

3 International Recruitment

All UK health and social care employing organisations, including The Children's Trust, must commit to recruiting ethically through adhering to the [Code of Practice for International Recruitment](#) (CoP) which implements the World Health Organisation's (WHO) Global Code of Practice.

The CoP promotes high standards of ethical practice in the international recruitment and employment of health and social care personnel in the private, public, and independent health or social care sectors. It also aims to protect and promote health and social care system sustainability through international cooperation, ensuring safeguards and support for countries with the most pressing health workforce challenges. The Children's Trust will adhere to the CoP including adopting the best practice benchmarks as set out in Appendix 3.

All international health and social care staff will be provided with a detailed Welcome pack in advance of their arrival at The Children's Trust. The Children's Trust recognises that some international staff may experience additional challenges relating to their transition to the UK, including feeling lonely, isolated or anxious. In this instance they should speak with their line manager or a member of the HRBP team who may refer them to the Occupational Health Service where applicable. Confidential support is available for all employees from the employee assistance programme and this may include counselling if appropriate, in addition to information and advice on practical matters. For further information on available resources to support Emotional Wellbeing refer to the Staff Handbook and the Loop.

International health and social care staff will have the same legal rights and responsibilities as domestically trained staff in all terms of employment and conditions of work. They will have the same access to further education and training and continuous professional development

4 The Children's Trust School

In order to comply with Keeping Children Safe in Education the following checks will apply in School:

Secretary of State Teacher Prohibition Order check Anyone appointed into a teaching role will be required to undergo a Secretary of State Teacher Prohibition Order check, to ensure that they are not prohibited from teaching

Historic General Teaching Council for England (GTCE) sanctions and restrictions. The Children's Trust School will conduct GTCE checks via the TRA Secure Access system where applicable.

Individuals who have lived or worked outside the UK: 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. These checks include:

- overseas police checks
- 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.
- obtaining a letter of professional standing from the professional regulating authority in the country in which the applicant has worked. Advice about which regulatory or professional body applicants should contact is available from the National Recognition Information Centre for the United Kingdom, UK ENIC.

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.

Although sanctions and restrictions imposed by another regulating authority do not prevent a person from taking up teaching positions in England, schools and colleges should consider the circumstances that led to the restriction or sanction being imposed when considering a candidate's suitability for employment. Further information can be found in DfE Guidance: Recruit teachers from overseas.

4.1 Disqualification under the Childcare Act 2006 Regulations 2018

The childcare disqualification arrangements apply to staff working with young children in childcare settings, including primary schools, nurseries, and other registered settings, such as childcare provisions on college sites. The arrangements predominantly apply to individuals working with children aged 5 and under, including reception classes, but also apply to those working in wraparound care for children up to the age of 8, such as breakfast clubs and after school care.

For staff who work in childcare provision, or who are directly concerned with the management of such provision, employers need to ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the Childcare Disqualifications Regulations 2018.

At the point of shortlisting, and via the CRSD Form, applicants will be asked whether they are disqualified from working with children.

4.2 Early Years Foundation Stage (EYFS) Candidates

All candidates offered a post within the Early Years Foundation Stage or working with children aged eight and under will be requested to complete a declaration, stating that they are not disqualified under the Childcare Act 2006 Regulations 2018.

The charity will consider any information disclosed before deciding whether to proceed with an offer. The Children's Trust will not knowingly employ any person to work in childcare or relate to the management of childcare if they are 'disqualified'.

Statutory guidance applying to the Childcare Act 2006 and the [Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 also applies to volunteers, Temporary Workers and school governors who volunteer with EYFS or are concerned with their daily management.

4.3 Disqualification from Caring for Children Regulations 2002

The Disqualification from Caring for Children Regulations 2002 prevent anyone from caring for children in a children's home, as a social worker or as a private foster carer if they meet certain criteria. Applicants will be asked via the CRSDF whether they are disqualified from working with children.

4.4 The Children's Trust School – Single Central Record (SCR)

In accordance with the Non-Maintained Special schools Regulations 2015, The Children's Trust School is responsible for maintaining the SCR which is a record of all pre-appointment checks conducted for relevant staff. This is managed by the School via a report on Select HR. There may be times when the Recruitment & Compliance Team may be required to provide relevant information or review missing data at the request of the School Regulatory Lead, to update and maintain the SCR.

5 Additional Requirements for the Registered Manager and Responsible Individual

When appointing the Registered Manager, The Children's Trust must ensure that the pre-employment checks are conducted in line with current regulatory requirements:

In addition to the above, the prospective candidate will also be required to undergo the necessary regulatory approval interviews, conducted by our external Regulators, to formally be appointed into the role of Registered Manager.

When appointing the Responsible Individual, The Children's Trust must ensure that the pre-employment checks conducted in accordance with current regulatory requirements.

6 Additional Checks for the Senior Leadership Team & Board Trustees

When appointing Senior Leadership Team members, The Children's Trust will carry out additional checks, in accordance with regulatory guidance to ensure that any applicants appointed are fit and proper to carry out this important role (see Appendix 4 for a full list).

The applicant should also be asked about any potential conflicts of interest that may compromise them in their ability to carry out their role.

Information and guidance relating to the appointment of new Board Members (i.e. Trustees / Non-Executive Directors) can be located in the Volunteering Policy.

7 Recruitment of Bank Staff

Bank staff are subject to the same pre-employment checks as permanent staff. The Recruitment & Compliance Team will agree induction dates and issue a Bank Welcome Letter.

Staff leaving The Children's Trust may request to transfer onto the Bank service, immediately after leaving their permanent position. It is the responsibility of the Line Manager to highlight this when completing the Leavers Form in Access SelectHR and the request will then be considered and processed by the Bank Staff Coordinator and People Team.

For any member of staff leaving permanent employment and joining the Bank service, there must be two weeks, from the day that they leave their permanent employment. This is to ensure that there is a clear end to their Continuous Service, and that this is not carried over.

Where an individual is leaving due to redundancy, there must be a period of six months before they are able to join Bank.

8 Recruitment of Temporary Workers

Recruitment agencies should only be used once direct sourcing has been fully explored. The use of recruitment agencies to source permanent workers must follow the procurement new supplier process.

In the first instance agencies from the Preferred Supplier List should be used; however, where they are unable to supply suitable candidates, alternative agencies may be sourced. In this instance, the Recruitment & Compliance Team must negotiate all relevant Terms & Conditions, in advance of the recruitment process starting.

For permanent or fixed-term contracts recruited via an agency, the appointed individual will be required to undergo the same pre-employment checks as an individual recruited directly by The Children's Trust.

Line Managers are responsible for ensuring that no temporary workers are brought onsite without consultation with the People Team, who will be able to advise on pre-employment checks and the potential requirement for IR35 assessment. It is also the responsibility of the Line Manager to ensure that all temporary workers undergo the required level of induction for the role, whether that be attending The Children's Trust formal induction (for longer assignments) or local induction.

For more detailed information about engaging all types of temporary workers refer to the Temporary & Visiting Workers Policy and also the IR35 Guidance.

9 Volunteers

All potential volunteers will undergo a recruitment and selection process that is appropriate to the role they are interested in undertaking. The Children's Trust uses processes such as application forms, face to face discussions, references and police checks to appropriately onboard a volunteer. Additional measures, checks and processes may be implemented depending on the nature of the volunteer role, for example in the case of Trustee Recruitment or specific skill roles like Volunteer Drivers.

For further information about the recruitment of volunteers please refer to the Volunteering policy.

10 Induction

As per the Training & Development Policy, all new employees and volunteers are required to attend The Children's Trust induction programme. In addition, staff who deliver direct care will participate in a programme of orientation during their first six months in post, including the completion of the Care Certificate. Each department is responsible for providing departmental orientation to new joiners. This will require attendance at compulsory training sessions relevant to their job roles.

In exceptional cases, where the business need is deemed to be critical, all pre-employment checks have been satisfactorily completed and with the agreement of the Senior People Operations Manager, a member of staff may be allowed to start outside of the usual Induction dates. In this instance, a Risk

Assessment must be completed (available on IRAR) along with the assurance that the staff member will attend the next available Induction date(s).

Each new employee is required to visit Reception during their Induction, to have their photograph taken for their Identity Card and be issued with the appropriate lanyard. Staff must agree and adhere to the Guide to Lanyards at The Children's Trust document (available on the Loop).

11 Retention and Security of Disclosure Information and Other Records

The Children's Trust observes the guidance issued and supported by the DBS on the use of disclosure information. For further information, refer to the *Disclosure & Barring Service (DBS) Checks Policy*.

For all other information, The Children's Trust retains and securely destroys relevant data, as stated in the Record Retention & Disposal Policy and Data Protection Policy, in accordance with the Data Protection Act (2018) and the UK General Data Protection Regulations (2018).

For information relating to how the People Team handles your data, refer to the *People Privacy Policy*, available on the Loop.

3.0 Document Change Control

Version	Status	Description (of changes)	Reviewed by	Reviewed/ Issued Date
2.1	Amendment	Addition of sections relating to online searches (KCSIE 2022). Sections 2.1.2, 2.1.5, 2.1.8	Kirsten Mackison	December 2022
2.2	Extension	Review date extended to Oct 23 to allow time for review following the publication of KCSIE 2023 in September 2023 as it is the changes to KCSIE 2023 that will drives the update of this policy	Extension approved by Mike Maddick & Olivia Rowntree	May 2023
2.3	Extension	Extended further 3 months to include feedback post Ofsted	Paul Fix	October 2023
3.1	Draft	Reformatting and general updates of policy	Kirsten Mackison	October 2023
3.2	Draft	General updates of the policy	Paul Fix	January 2024
3.23	Draft	Addition of sections 2.13 and 2.14 Section 2.15	Kirsten Mackison/ Paul Fix	January 2024
3.24	Draft	Amendments to ensure that when individuals move role file checks (and other actions) are undertaken to ensure that the employee file meets the current recruitment or regulatory thresholds. Guidance relating to OH checks added Section 2.5 renamed to 'Conflicts of interest' and content changed to signpost to the relevant policy.	Joanna Gillespie	January 2024
3.25	Draft	Amendment to section 2.13. OH assessment for substantial role moves only Updated Appendix 2 Section 2.12 Clarification of suitable character referees (from NHS standards) Update of section on Right to Work	Paul Fix Paul Fix Shirley Swann	January 2024
3.26	Draft	Policy significantly shortened at request of Michael Maddick. Reference to regulations mandated rather than listing individual checks. Full detail is	Kirsten Mackison	February 2024

Version	Status	Description (of changes)	Reviewed by	Reviewed/ Issued Date
		already captured in the Recruitment Team Compliance Manual Additional appendix summarising pre-employment checks		
	Final	Final review by Michael Maddick.	Michael Maddick	February 2024
4.1	Draft	Addition of section relating to code of practice for employing international staff Addition of definition of international staff Addition of Appendix 3- Best Practice Benchmarks for International recruitment Inclusion of Code of practices to external references section Addition of links to Home Office RTW guidance.	Kirsten Mackison	October 2024
4.2	Draft	Final review, minor amends to language and titles.	Paul Fix	November 2024

Appendix 1 – Stakeholder Engagement Checklist

Review and complete the following checklist to indicate which stakeholders were consulted in the development of this policy.

#	Question	Yes/ No	Stakeholder(s) to be consulted
1	Is there a statutory requirement to have in place this particular policy/ does the policy need to comply with detailed legislation?	Yes	Audit, Risk and Governance team
2	Is implementation of the policy (or any element of it) dependent on the use of new or existing information technology?	No	Head of IT
3	Does implementation of the policy (or any element of it) place any demands on/ or affect the activities of the Estates and Facilities teams (e.g. does it impact the provision or maintenance of premises, equipment, vehicles or other TCT assets)?	No	Head of Estates
4	Does implementation of the policy or any element of it involve/ impact the processing of personal data?	Yes	Data Protection Officer
5	Does implementation of the policy require significant unbudgeted operational or capital expenditure?	No	Finance Director
6	Does implementation of the policy (or any element of it) directly or indirectly impact on the delivery of services / activities in other areas of the organisation? E.g. a policy written by a clinical lead in CF&S might impact on the delivery of care for CYP attending the School.	Yes	Relevant, impacted OLT members
7	Is there a need to consider Health and Safety or potential environmental impacts in developing and implementing the policy?	No	Health and Safety Manager
8	Have you consulted with a representative of those who will be directly impacted by the policy?	Yes	Mike Maddick, Claire Shiels, Launa Randles
9	Is there a need to consider Equity, Diversity and Inclusion in developing and implementing the policy?	Yes	EDI Lead
10	Is there a need to consider sustainability and potential environmental impacts in developing and implementing the policy?	No	Lead for Responsible Organisation
11	Please detail any other stakeholder groups consulted, if applicable.	N/A	

Appendix 2- Pre-employment checks (carried out in accordance with current regulations and statutory guidance)

Pre-employment checks
Proof of identity including a recent photograph
Application form (a CV cannot be accepted in isolation)
Employment history with written explanation of any gaps, dating back to school leaving age (i.e., 16 or 18 years)
Two professional references including last employer and covering a minimum of 3 years
Historic references for all instances of working with children and young people including verification so far as reasonably practicable of the reason why the employment or position ended.
Offer letter and contract
Right to Work checks - carried out in accordance with Home Office Guidance and following the code of practice on avoiding unlawful discrimination while seeking to prevent illegal working.
DBS checks (as dictated by the role). For those who are moving to the UK, a UK DBS check will still be required
Certificate of Good Conduct/Overseas Police Checks.
Occupational Health Check
Qualifications
Professional Registration

Appendix 3 – Best Practice Benchmarks for Recruitment of International Staff

1. The Children's Trust will not actively recruit health and social care staff from countries on the red country list
2. All international recruitment will follow good recruitment practice and demonstrate a sound ethical approach
3. International health and social care staff will not be charged fees for recruitment services in relation to gaining employment in the UK
4. All international health and social care staff must have the appropriate level of English language to enable them to undertake their role effectively and to meet registration requirements of the appropriate regulatory body
5. All appointed international health and social care staff must be registered with the appropriate UK regulatory body.
6. All international health and social care staff required to undertake supervised practice, by a regulatory body, should be fully supported in this process.
7. All international health and social care staff will undergo the normal occupational health assessment prior to commencing employment.
8. All international health and social care staff will have appropriate pre-employment checks including those for any criminal convictions or cautions as required by UK legislation.
9. All international health and social care staff offered a post will have a valid visa before entry to the UK.
10. Appropriate information about the post being applied for will be made available to a candidate at an early stage so international health and social care staff can make an informed decision on whether to accept a job offer.
11. The Children's Trust will observe fair and just contractual practices in the employment of international health and care staff.
12. Repayment clauses included in the employment contract will abide by the 4 principles of transparency, proportionate costs, timing and flexibility.
13. All newly appointed international health and social care staff will be offered appropriate support and induction. As part of this The Children's Trust will undertake pre-employment/placement preparation activity to ensure a respectful working environment for all.
14. The Children's Trust will respond appropriately to applications from international health and social care staff who are a direct application.
15. Health and social care employers, recruitment organisations, agencies, collaborations and contracting bodies should record international recruitment activities. This will support the monitoring and measurement of international workforce flows and their impact.

Appendix 4 – Additional checks for SLT/Trustees

SLT / Executive Directors	
CQC Notification (Actioned by Registered Manager)	<ul style="list-style-type: none"> Trustees/SLT (where applicable) Registration Application Form completed for every new appointment Copy of completed form to be added to individual's file
Ofsted Notification (Actioned by Company Secretary)	<ul style="list-style-type: none"> Change of Nominated Individual must be reported to Ofsted using SC3 form
Companies House Notification	<ul style="list-style-type: none"> Trustees
Charity Commission Declaration Completed	<ul style="list-style-type: none"> Trustees
Charity Commission Register Check	<ul style="list-style-type: none"> SLT / Trustees
Companies House check	<ul style="list-style-type: none"> Required for Trustees/Governors, Chief Executive and Responsible Individual Note to file and/or screenshot/print-out of check, stamped, signed and dated. Companies House (general information about a company)
Companies House Database of Disqualified Directors Search	<ul style="list-style-type: none"> Required for Trustees/Governors, Chief Executive and Responsible Individual Note to file and/or screenshot/print-out of check, stamped, signed and dated. Companies House disqualified Directors' register
Insolvency Register Check	<ul style="list-style-type: none"> Required for Trustees/Governors, Chief executive and Responsible Individual Note to file and/or screenshot/print-out of check stamped, signed and dated Individual Insolvency Register