



Safer Recruitment Policy

1. Introduction

This policy sets out the approach that we take when recruiting members of staff posts involving working with vulnerable young adults. Although the majority of our learners are over the age of 19 years there may be occasions where we work with learners / apprentices who may be between the ages of 16-18 or over 19 that may be classified as a vulnerable adult.

HCF CATCH Ltd Approach to recruitment

HCF CATCH Ltd will comply with its legal obligations in relation to recruiting people to work and with children and vulnerable young adults in England and Wales. The key principles to our approach are captured below.

- a) Recruiting the right staff in the right place at the right time is vital for our continued success in providing the highest standards of education to our students.
- b) Not appointing the right people to our roles can have a negative impact on the performance of our organisation.
- c) The Directors (in conjunction with the relevant line manager) is responsible for deciding on the arrangements to recruit to any post within the company
- d) In carrying out our recruitment processes we are committed to the creation of a safe environment for our students by operating safer recruitment practices in line with the statutory requirements and guidance.
- e) We are also committed to ensuring that throughout our recruitment and selection processes no applicant is disadvantaged or discriminated against because of the protected characteristics of age, disability, gender, gender re-assignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief and sexual orientation.
- f) In the very exceptional cases where we are required to discriminate due to an occupational requirement this must be approved by the HR Resourcing Manager who will provide reasons for this requirement.
- g) Recruitment will be solely on the basis of the applicant's abilities and individual merit as measured against the criteria for the job. Qualifications, knowledge, experience and skills will be assessed at the level that is relevant to the job.
- h) If an applicant makes us aware, at any stage of the recruitment process, that they have a disability then reasonable adjustments must be considered to ensure the applicant is not disadvantaged by the process.

2 Scope and purpose

2.1 It is essential that, as part of the responsibilities highlighted above, all organisations that employ staff to work directly with young or vulnerable adults adopt a consistent and rigorous approach in



their recruitment and selection processes with the aim of ensuring that those recruited are suitable for such an important and responsible role. The purpose of safer recruitment is ultimately to

a) Deter. From the beginning of the recruitment process, it is important to send the right message – that the organisation has a rigorous recruitment process and does not tolerate any form of abuse. Wording in adverts and recruitment information must aim to deter potential abusers.

b) Identify and Reject. It will not always be possible to deter potential abusers. Therefore, careful planning for the interview and selection stage, in terms of asking the right questions, setting appropriate tasks and obtaining the right information can assist in finding out who is suitable for the role and who is not.

c) Prevent and Reject. There are no guarantees that even the most robust safer recruitment process will prevent an inappropriate appointment. However, this does not mean it is too late to act. Ensuring that comprehensive induction processes are in place, together with appropriate policies and procedures, raising awareness through staff training and generally developing and maintaining a safe culture will all help to prevent abuse or identify potential abusers

The intention of this policy is to ensure that all stages of the recruitment process contain measures to deter, identify, prevent and reject unsuitable people from gaining access to students within the organisation. The policy and the practical implementation of recruitment and selection processes also aim to meet all legislative requirements as highlighted above, any statutory or other guidance that may from time to time be issued in order to keep children safe and safer recruitment in education, as well as principles of general good practice.

3 Roles and responsibility

HCF CATCH LTD Directors has overall responsibility for the effective operation of this policy and for ensuring compliance with the relevant statutory framework.

4 Regulated activity and Disclosure and barring service checks

4.1 Organisations providing 'Regulated Activity' in relation to children and young people have specific responsibilities for carrying out appropriate pre-employment checks, including Enhanced Disclosure and Barring Service (DBS) with Barred List check, when recruiting paid members of staff and workers. Other people coming into such an organisation (e.g., volunteers) with access to children may not be in regulated activity – if they are 'adequately supervised' when carrying out an activity with children which would be regulated activity when unsupervised. HCF CATCH LTD is responsible for continuing vigilance in relation to staff and workers and any others coming onto the premises, and/or with access or opportunity for contact with the students, at all times.

4.2 All members of staff and paid workers and similar educational establishments providing education are in regulated activity. We will ensure that an Enhanced DBS with Barred List check is in place. This will include all categories of staff and workers, as all, even if not directly involved in teaching or supervising children, will have the opportunity for contact.

4.3 We will follow guidance in relation to 'adequately supervised' in accordance with statutory supervision guidance published by the DfE.

4.4 Contractors carrying out work of a temporary or occasional nature, e.g., maintenance (but not teaching, training etc) are not normally in RA. However, for long-term regular contracted work a



decision needs to be made about whether individuals have the opportunity for contact (e.g., in a similar way to school site staff) and can be deemed to be in RA. Decisions must be made on a case-by-case basis, taking into account the relevant and prevailing circumstances at the time.

4.5 As trainee tutors/ coaches can undertake regulated activity, sometimes unsupervised, an enhanced DBS certificate and barred list check must be obtained. Where trainees are salaried (employed) this is the responsibility of the employer.

HCF CATCH Ltd will take appropriate steps to ensure that all those members of staff, paid workers and any others deemed to be in regulated activity, are subject to the highest level of checks including, for new recruits, a full Enhanced DBS with Barred List Check, or as required at the time of recruitment. Others not in regulated activity will normally be required to undergo an Enhanced DBS without Barred List check if they have regular involvement with students but are adequately supervised. However, if they are carrying out ad-hoc or one-off volunteering activities etc., they will not normally be subject to an Enhanced DBS check (see below 'Use of Agency Workers' and use of 'Volunteers').

For any persons deemed not to be in regulated activity, steps will be taken to ensure that adequate supervision and/or protocols to ensure the safety of students at all times, are in place, in accordance with statutory guidance and general good practice. An appropriate level of checks, in addition to the requirements set out above, will be carried out in relation to all new recruits.

5 Safer recruitment

- a) All recruitment must be in line with this policy to ensure that we identify, deter and prevent people who pose a risk of harm from working with our students.
- b) The recruitment of all applicants and volunteers must, without exception, follow the processes of safer recruitment. All offers of employment will be subject to us being satisfied that the applicant or volunteer is a suitable person to work with children and young people.
- c) Any person involved in recruiting must read the 'Keeping Children Safe in Education' (2019) guidance or updated statutory guidance produced by the Department for Education (DfE).
- d) All recruitment must be planned to ensure that there is adequate time available to recruit safely.
- e) Any person who becomes aware that this policy is not being followed during recruitment must inform Directors immediately.
- f) All of the checks described above must be carried out and have been determined as satisfactory before an applicant can start their employment. This will be confirmed in any job offer for staff that are deemed to come under 'regulated activity'.

6 Advertising

- a) Any vacant position will normally be advertised via the appropriate channels to ensure the most appropriate field of applicants is obtained.
- b) All advertisements will have the following statement about safeguarding children and young people and the requirement to have a DBS check: HCF CATCH Ltd and those responsible for governance in the organisation are committed to safeguarding and promoting the welfare of its students and expects everybody working for the organisation to share this commitment. We actively



seek DBS enhanced clearance checks and any application for employment will automatically include the active pursuit of all safeguarding procedures.'

Job Description

a) When a vacancy arises due to a member of staff leaving or moving to a different role, it cannot be assumed that a 'like for like' replacement is required. A review of the job description may highlight the fact that the existing role no longer meets current needs. Therefore, the requirements for any replacement or new role will be analysed prior to drawing up the Job Description and Person Specification which define the role.

b) A job description will be required for all posts which describes the duties and responsibilities of the post. It must be up to date, accurate and specific to the role; it may need to reflect any local or national requirements and Condition's document sets out the contractual framework for all teachers in terms of their professional responsibilities and duties. The job description must also include a person specification which outlines all of the necessary skills, experience, qualifications and knowledge requirements for the post. Person Specification a) The person specification describes the profile of the ideal person to fill the job requirements. It is essential to the recruitment and selection process as it is used to draw up the advertisement, shortlist and the interview and selection process. It sets out the criteria against which candidates will be assessed and includes the core areas for the focus of interview questions. The Person specifications will outline: ▪ Any qualifications required for the post ▪ Knowledge, skills and abilities required to carry out the duties of the post ▪ Any specific training requirements ▪ The need for awareness of, and commitment to, equal opportunities

All job descriptions and person specifications must make reference to the responsibility for safeguarding, health and safety at work and promoting the welfare of children.

The person specification will clearly indicate whether the stated criteria are a) Essential – relating only to those areas without which the job cannot be performed; or b) Desirable – not essential to carrying out the duties, but which would be valuable.

They may assist in the final selection process if several candidates all meet the essential criteria. It will also indicate how the criteria will be tested, i.e., on the application form, at interview and/or through a task set as part of the selection process.

Application Forms

The use of application forms will help to ensure that detailed information, critical to the recruitment process, can be gathered from all applicants in a consistent format.

Application forms used for all external recruitment will include

- 10 a) Personal details including name, former names, current address, NI number.

- b) Qualifications

- c) Present (or last) employment and reason for leaving

- d) Full history since leaving school - education, employment and any voluntary work, as well as an explanation of any gaps

- e) Request for details of appropriate referees



f) The requirement for a personal statement addressing the criteria set out in the person specification

g) Explanation that the post is exempt from the provisions of Section 4 (2) of the Rehabilitation of Offenders Act 1974 by virtue of the Rehabilitation of Offenders Act 1974 (exceptions) Order 1975 and the requirement for a 'self-disclosure' – a signed declaration of any unspent and relevant spent criminal offences

(h) The requirement for a declaration that all information provided is true.

DECLARATION OF UNSPENT AND RELEVANT SPENT CRIMINAL OFFENCES

The purpose of requiring a self-disclosure as part of the application is to give candidates an opportunity to share relevant information about any convictions or cautions at an early stage. Disclosed information will not be used as a criterion for short-listing. Fair and objective assessment criteria will be applied. Information on self-disclosures will only be used in relation to short-listed candidates and will not automatically rule someone out. A full DBS check will still be carried out on making a conditional offer and the two sets of information compared. Note that applicants will only be asked about 'unspent and relevant spent' convictions, cautions, reprimands and warnings and these will be the only ones appearing on Disclosure certificates. Other minor, older offences will be filtered out after the relevant time period. Those offences to be declared include: Cautions relating to an offence from a list (see below) agreed by Parliament Cautions given less than 6 years ago (where the individual was over 18 years old at the time of the caution) Cautions given less than 2 years ago (where the individual was under 18 years old at the time of the caution)

Convictions relating to an offence from a prescribed list (see below)

- Convictions that resulted in a custodial sentence (regardless of whether served
-) Convictions given less than 11 years ago (where the individual was over 18 years old at the time of the conviction)
- Convictions given less than 5.5 years ago (where the individual was under 18 years old at the time of the conviction) Irrespective of the above list, if individuals have more than one conviction then ALL convictions must be declared.

The list referred to above includes a range of offences which are serious, and which relate to sexual offending, violent offending and/or safeguarding. It is never appropriate to withhold details of offences on this list. A list of offences which must always be declared has been derived from the legislation and can be accessed [here](#).

Shortlisting Applicants will be short-listed against the requirements of the person specification. This will be carried out by the interview panel. The outcome of the short-listing process will be recorded and retained. The short-listing panel are responsible for scrutinising the application forms and identifying any gaps in employment or other areas that may affect an applicant's suitability to work with children and young people. A satisfactory explanation for any concerns must be obtained from the applicant during the interview process.

10 References

10.1 All offers of employment will be conditional upon receipt of at least two satisfactory written references. References will: a) be requested for all shortlisted applicants for a tutor / coaching role b) include the applicant's current or most recent employer and where an applicant for a



tutor/ coach post is not currently employed as a tutor / coach , will include the applicant's most recent employer as a tutor / coach c) ask the current employer for details of any disciplinary warnings which were current at the time of leaving d) any disciplinary/capability action that is/was pending or unresolved e) details of any expired warnings that relate to the safety and welfare of children or young people or behaviour towards children or young people f) reason(s) for leaving if no longer in that employment g) any convictions the referee may be aware of h) whether the referee would re-employ and whether the applicant is recommended for the post i) be directly from the referee j) not be accepted if they are 'to whom it may concern' letters k) request information on the applicant's suitability to work with children and young people l) be requested before the interview; and be explored further with the referee and with the applicant during the interview if necessary m) references requested prior to interview, or prior to a conditional job offer being made, will NOT ask about attendance or health-related matters.

However, health-related questions may be asked of referees when a conditional offer of the post has been made. Therefore, a supplementary request for further information from referees may be made at that stage n) where it has not been possible to obtain references before the interview any concerns that are subsequently raised will need to be resolved before the appointment is confirmed o) in order to comply with the Equality Act 2010, information relating to sickness absence will only be requested after a conditional offer of employment has been made

10.2 Referees will be provided with a copy of the job description and person specification for the post.

10.3 Sometimes, a referee may not be willing to complete a standard reference questionnaire. This may be because a particular organisation has a policy of providing references only in a certain format, or because a standard reference has been agreed as part of a settlement (previously known as compromise) agreement. In these circumstances, it is at the discretion of the Trust to decide whether to accept this situation or to not proceed any further with the application. This may depend upon other information received or other checks that can be carried out.

10.4 The Equality Act 2010 limits the circumstances in which a prospective employer can ask health-related questions of either a referee or the applicant before a conditional job offer is made. Questions may only be asked at an early stage to:

- decide whether any reasonable adjustments need to be made for the applicant to be able to participate in the selection process
- decide whether an applicant can carry out a function that is essential (intrinsic) to the job
- monitor diversity among people making applications for jobs
- take positive action to assist disabled people
- clarify that a candidate does have a disability where the job genuinely requires the jobholder to have a disability

10.5 Where any of these circumstances apply, information will be provided in the recruitment materials, requested as part of the application form/process, and/or requested of referees, only as relevant to the circumstances: a) References will be obtained prior to interview wherever possible and, on receipt, the interview panel and/or those who carried out the long/shortlisting will scrutinise the references b) The interview panel will confirm whether or not all questions have been answered satisfactorily and whether there are any statements or issues that need to



be further explored with the referee e.g. if answers provided are vague. c) And compare the information provided by the applicant with that provided by referees.

10.6 Any inconsistencies, discrepancies or concerns will be followed up with referees and/or applicants prior to interview, or as part of the interview process, as appropriate.

11 Interviews

11.1 A face to face interview must take place for all applicants to all posts. The use of video conferencing, zoom, Facetime or other similar technologies is acceptable for a preliminary interview.

11.2 All those involved in interviewing must be provided with guidance/ training. At least one person on the interview panel must have successfully passed the appropriate safer recruitment training. Wherever possible all panel members will be involved throughout all stages of the recruitment and selection process but, in any event, a panel member trained in safer recruitment will be involved throughout.

11.3 The purpose of the interview is to assess the merits of each applicant against the job description and person specification to establish their suitability for the post and to work with children and young people.

11.4 Interviews should be conducted with a minimum of two interviewers on the panel

11.5 Before the interview commences the interview panel should have:

- prepared appropriate questions for the role
- prepared appropriate questions to test the applicant's suitability to work with children and young people

11.6 Identified any areas for further probing, e.g., if a criminal record or caution has been declared or if there are gaps in employment and to assess interaction and responsiveness to questions.

11.7 Agreed assessment criteria which reflects the person specification.

11.8 Decided a structure to the interview and established which member of the panel will ask which questions.

11.9 A set of common questions relating to the requirements of the post will be asked of each applicant. Their response will determine whether that is followed up with further questioning.

12 Other selection methods

12.1 Assessment and selection methods in addition to an interview are useful in obtaining a range of information about individuals, including assessing their interaction with others - adults and students - team work, skills and abilities to carry out particular tasks. In addition to a face to face interview with the interview panel a variety of other selection methods may be used, such as:

- One or more additional panel interviews (for example, a panel made up of students from one or various academies)
- A presentation
- In tray exercises, written tests and psychometric testing
- Role play
- Group exercises
- Data analysis exercises
- Observation (of teaching or an activity with a class or group of students or colleagues)

• Those responsible for deciding the arrangements for recruitment to a specific post will determine the selection method(s). They will be relevant and appropriate to the role and will be based on the requirements for the particular



post as set out in the job description and person specification • Candidates will be informed in advance if any selection methods are to be used in addition to a face-to-face interview and what these are:-

13 Pre- employment checks

An offer of appointment to the successful applicant will be conditional upon the following: • receipt of at least two satisfactory written references (one of which must be their current or most recent employer) • verification of the applicant's identity, preferably from current photographic ID and proof of address • verification of the applicant's medical fitness • verification of qualifications where relevant • verification of professional status where applicable. For tutors , this will include checking that the individual has the required teaching/ training qualification • satisfactory enhanced DBS check .a clear children's barred list check (except supervised volunteers) • verification of right to work in the United Kingdom • any further checks where the applicant has lived or work outside of the UK including receipt of criminal record information from overseas • confirmation that the applicant is not disqualified or disqualified by association from providing childcare

Disclosure and Barring Service:

The criminal record checking service allows employers to access the criminal record history of people working, or seeking to work in certain positions, especially those that involve working with vulnerable groups. The Disclosure and Barring Service (DBS) helps employers make safer recruitment decisions and prevent unsuitable people from working with vulnerable groups, including children. It replaces the Criminal Records Bureau (CRB) and Independent Safeguarding Authority (ISA). The creation of the vetting and barring service was introduced under the Safeguarding Vulnerable Groups Act 2006.

15. Process for DBS checks

15.1 Where the successful applicant has been working without a break in employment If they already have a DBS certificate, they will not need to obtain another one as long as there has not been a gap in their attendance in employment and within the last calendar year. They have to declare any convictions or cautions they may have received since the DBS took place.

15.2 Where the successful applicant is moving from a different sector or has a break in employment • To enable the job applicant to carry out the DBS check the HR team will arrange for a link to be sent to the individual to complete an online application for DBS clearance. The individual is required to provide 2 forms of their identification for the HR team to verify their identity and to complete the process.

- Once the check has been carried out, the DBS should send the certificate to the applicant. The organisation will ask the job applicant for sight of the DBS certificate and will retain the certificate number on our records. • Where the job applicant for the post is a member of the DBS update service, the organisation will, with permission, carry out a status check on any current certificate.

Disclosure and Barring Service (DBS) checks – new members of staff. We will carry out DBS checks for new appointments, before the employee starts work:



Information relating to an individual's criminal record will only be shared with the relevant people to enable us to make a decision about their suitability to work with children and young people. It will be held for no longer than is necessary and will be processed in line with the Data Protection Act 2018. 1

Disclosure and Barring Service (DBS) checks - existing members of staff and volunteers an enhanced DBS check and a children's barred list check will be carried out for all existing staff and unsupervised volunteers where their contact with children or young people has increased from that at the time of appointment.

- An enhanced DBS and children's barred list check may be carried out on any staff member or where we have concerns about an individual's suitability to work with children and young people.
- DBS certificates will only be issued to the applicant. We expect all applicants to produce the disclosure when requested to do so. Any existing member of staff who does not produce their DBS disclosure will be managed through the disciplinary procedure.
- All existing members of staff are required to inform the employer of any change in their criminal record. This includes convictions, cautions, arrests, and police investigations.

We may require all members of staff to sign a declaration on an annual basis that there has been no change in their criminal record. Action may be taken as a result of any change or any failure to inform the trust of any change.

15 Offers of employment

An offer of employment for a post involving work with children/vulnerable adults will be conditional on the job applicant satisfying our usual requirements for employment (for example to provide two satisfactory references and produce documentation establishing their identity and right to work in the UK).

In addition, the offer of employment will be conditional, where required, on satisfactory completion of DBS checks, depending on the post in question. Where the job applicant refuses to agree to an application to the DBS or a DBS check is completed but the job applicant refuses to allow us to see the DBS certificate, they will be treated as not having satisfactorily completed the DBS check.

- No job applicant will be permitted to commence employment until all specified conditions are satisfied.
- Proof of identity current photographic identification for example passport, driving licence and proof of address except where, in exceptional circumstances, none is available.
- Receipt of evidence to meet the requirements of the Immigration Act 2016.
- Not all criminal convictions will be a bar to employment. The results of a DBS check will be considered on an individual basis and we will act in a proportionate manner when deciding whether or not to proceed with the appointment to the post in question. However, the protection of children/vulnerable adult is the organisation's primary concern

Record keeping and Data Protection



All written records of interviews, application forms and reasons for appointment or nonappointment will be kept for six months, unless a longer period can be justified by the Director. Records will be treated as confidential and kept for no longer than necessary in accordance with the Data Protection Act 2018.

Handling of data

We are committed to ensuring that all information provided about an individual's criminal convictions, including any information released in disclosures, is used fairly and is stored and handled appropriately and in accordance with the provisions of the Data Protection Act 2018. • Data held on file about an individual's criminal convictions will be held only for as long as is required for employment purposes and will not be disclosed to any unauthorised person. • We are also committed to going through the proper DBS channels to establish whether or not an individual has a criminal record. We will not require job applicants or existing members of staff to use their subject access rights under data protection provisions to provide criminal record details unless this is required by law.

Retention of Data for Successful Applicants

The personnel records of all staff members will be retained for 6 years after they have left the employment. However, where a member of staff has been the subject of an allegation(s) the record will be retained at least until the accused has reached normal retirement age or for a period of 10 years if that is the longer. Following appointment data kept in personnel files will consist of, application form, references, pre-employment check data, job description and contract of employment.

Details of allegations that are found have been malicious will be removed from personnel records. However, for all other allegations a clear and comprehensive summary of the allegation, how the allegation was followed up and resolved and a note of any action taken, and decisions reached, is kept on the confidential personnel file of the accused, and a copy provided to the person concerned. The record will be retained until the accused has reached normal retirement age or for a period of 10 years from the date of the allegation if that is longer.

Induction

Induction is an extension of the recruitment process and will apply on commencement of employment. A general Induction Programme is required for all new recruits, including those already within HCF CATCH Ltd but appointed to new roles.

All Staff who are 'new staff members' whether new entrants, newly appointed staff, new starters or existing staff transferring to a new or different role will have, three month and six-month review with their line manager to ensure that they have everything they need to perform well in their new role.

The induction programme will include, for all, information on professional standards and boundaries in respect of child protection and safeguarding and promoting the health, safety and welfare of students.



Reference will be made to statutory requirements and/or local guidance in these areas. i.e., DfE documents: a. 'Keeping Children Safe in Education' 2019 b. 'Working Together to Safeguard Children' 2019 c. HCF CATCH LTD policies, procedures and practices adhering to code of conduct for HCF CATCH LTD

Safe culture and on-going vigilance

It is never sufficient to assume that a safer recruitment and selection process and robust induction arrangements are enough to ensure that the students are safe and that there is no risk to them within the educational environment. Creation of a safe culture, with on-going vigilance is essential. We will continue to strive to create and maintain a safer culture by:

- Having in place, and putting into practice, clear policies and procedures and ensuring that all members of staff, workers, volunteers, stakeholders are aware and understand them
- Setting acceptable standards of behaviour
- Having in place clear procedures for reporting concerns, ensuring that all staff members and workers know what their responsibilities are
- Taking concerns seriously and providing support to individuals raising them
- Taking appropriate action to concerns raised
- Ensuring robust and appropriate induction arrangements are in place
- Ensuring that all staff members and workers undertake child protection and other relevant training on a regular basis

Breaches of the Policy

- Any instances of this policy not being adhered to will be taken very seriously and appropriate disciplinary action will be taken.
- Any complaint in relation to this policy, including its application will be managed through the Complaints or Grievance policy (for existing members of staff)

Review of policy

This policy is reviewed annually. We will monitor the application and outcomes of this policy to ensure it is working effectively.

Signature

A handwritten signature in black ink, appearing to read "David Talbot".

David Talbot
CEO
25/01/24