



Safeguarding: Safer Recruitment Policy and Procedure

United Kingdom

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Contact names	
Head	Mrs Lois Gaffney Lois.gaffney@brightoncollegeprepkensington.co.uk
Deputy Head	Mr Chris Cripps Chris.cripps@brightoncollegeprepkensington.co.uk
DSL, Head of Upper School, Director of Sport	Mr Dan Wood Daniel.Wood@brightoncollegeprepkensington.co.uk
Head of Pre-Prep & Nursery, DDSL	Mrs Rachel Carlish Rachel.carlish@brightoncollegeprepkensington.co.uk
DDSL, Head of English	Mr Gary White Gary.white@brightoncollegeprepkensington.co.uk
Head of Curriculum Innovation	Mr Douglas Napolitano Cremin douglas.napolitano-cremin@brightoncollegeprep.co.uk
HR Business Partner	
Cognita Director of Education	James Carroll James.carroll@cognita.com
Cognita (Proprietor)	CEO Europe & N America Cognita 3rd Floor 41/42 Eastcastle Street London W1W 8DU

SAFER RECRUITMENT KEY FACTS: There are seven steps to safer recruitment:

- 1. Safer Recruitment Training**
 - a. NSPCC Safer Recruitment e-learning Online Portal (*to provide the interviewer with the context and knowledge to explore their safeguarding responsibility*)
- 2. Role Profile and Advertisements**
 - a. Safeguarding commitment statement to be included in both Role Profile and Job advertisement (*to deter unsuitable personnel*)
- 3. Scrutinising, Shortlisting and Interviewing**
 - a. Application form (*to be used as main tool for scrutinising*)
 - b. Internet search (*to gather any public domain information*)
 - c. Full employment and education history (*to provide previous experience*)
 - d. Gaps in employment history (*to be noted for further exploration*)
 - e. Taking up references (*to verify previous experience*)
 - f. Concerns from a reference (*to be noted for further exploration*)
 - g. Invitation to interview letter with Self Declaration form (*to prepare for interview*)
 - h. Preparing for the interview (*Selection Process and Interview Panel*) including any declarations on Self Declaration
 - i. Verify identity
 - j. Verify professional qualifications
 - k. Interview (*Scope of Interview, Outcome and Regrets*)
- 4. Offer letter and Contract of Employment** (*specific reference is made to professional expectations to safeguard the company*)
 - a. Terms and Conditions of Employment
 - b. Probation
 - c. Rehabilitation of Offenders (*UK only*)
 - d. Disciplinary and Performance Improvement Procedure
 - e. Standards and Policies:
 - A. Ofsted Framework (*England only*)
 - B. Welsh Government Guidance (revised) Professional Standards for Education Practitioners in Wales 020/2011
 - f. Safeguarding Declaration
- 5. Background Checks** (*in addition to pre-interview checks, the following ensure the person is who they state they are and complies with our safeguarding requirements*)
 - a. References
 - b. Identity check
 - c. Right to Work
 - d. Enhanced Disclosure and Barred List check (and Additional Social Media Check if required)
 - e. Overseas criminal records checks (*if applicable*)
 - f. Letter of Professional Standing (*if applicable*)
 - g. Prohibition from Teaching check (*if applicable*)
 - h. Prohibition from Management check (*if applicable*)
 - i. Registration with Education Workforce Council – EWC (*Wales only – if applicable*)
 - j. Disqualification declaration (*if applicable*)
 - k. Medical fitness
- 6. Recording and Monitoring New Starters** (*to evidence all background checks have been completed and suitably returned*)
 - a. SCR – updated for all new starters
 - b. New Starter Checklist (*to be completed and filed on employee file*)
 - c. Risk Assessment Form (*to be completed online on SCR*)
 - d. Annual Staff Declaration (*Safeguarding and Compliance Record*)
 - e. Change of Employment (please refer to the SCR Guidance and FAQ for transfer of employees or change in user status for compliance on SCR)
- 7. Probation Period & Induction**
 - a. The schools attitude and expectations regarding safeguarding are clearly articulated including personal behaviours and reporting lines for any concerns
 - b. Required safeguarding training is completed during the probationary period (in accordance with the Regional Safeguarding Policy) Assess performance, conduct and final suitability for working with children in your school before confirming permanent appointment

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Related documentation	Safer Recruitment Toolkit (Employee and Non Employee)
	SCR Guidance Template
	Regional Safer Recruitment Oversight Arrangements
	Right to Work Guidance

TABLE OF CONTENTS

1.	PURPOSE.....	7
2.	APPLICABILITY	7
3.	DEFINITIONS AND SCOPE	7
4.	POLICY	7
5.	RELATED POLICIES, GUIDELINES, TEMPLATES AND FORMS	9
6.	STEP 1: SAFER RECRUITMENT TRAINING.....	9
7.	STEP 2A: ROLE PROFILES	9
8.	STEP 2B: ADVERTISEMENTS.....	10
9.	STEP 3: SCRUTINISING, SHORTLISTING AND INTERVIEWING	10
10.	STEP 4: OFFER LETTER & CONTRACT OF EMPLOYMENT.....	11
11.	STEP 5: BACKGROUND CHECKS.....	11
12.	STEP 6: RECORDING & MONITORING NEW STARTERS	12
13.	STEP 7: PROBATION PERIOD & INDUCTION	14
14.	SAFER RECRUITMENT PROCEDURE FOR NON-EMPLOYEE GROUPS.....	15
15.	SAFER RECRUITMENT PROCEDURE – VISITORS.....	16
16.	COMPLIANCE	16
	APPENDIX 1: SCRUTINISING, SHORTLISTING & INTERVIEWING.....	18
1.	INTRODUCTION TO SCRUTINISING, SHORTLISTING AND INTERVIEWING	18
2.	THE APPLICATION FORM	18
3.	BASIC INTERNET SEARCH & SOCIAL MEDIA SEARCH	19
4.	FULL EMPLOYMENT HISTORY AND GAPS IN EMPLOYMENT HISTORY	19
5.	SELF DECLARATION FORM	20
6.	REFERENCES.....	20
7.	REFERENCES - TEACHING STAFF.....	21
8.	REFERENCES - NON-TEACHING SCHOOL-BASED STAFF	21
9.	CONCERNS FROM A REFERENCE	21
10.	INVITATION TO INTERVIEW.....	21
11.	INTERVIEW PREPARATION – SELECTION PROCESS	22
12.	INTERVIEW PREPARATION – INTERVIEW PANEL	22
13.	VERIFY IDENTITY	23
14.	VERIFY PROFESSIONAL QUALIFICATIONS.....	23
15.	INTERVIEW - SCOPE OF INTERVIEW, OUTCOME & REGRETS.....	23
	APPENDIX 2: BACKGROUND CHECKS	25
1.	BACKGROUND CHECKS INTRODUCTION.....	25
2.	REFERENCES.....	27

3.	VERIFYING IDENTITY.....	27
4.	RIGHT TO WORK.....	27
5.	ENHANCED DISCLOSURE AND BARRING (DBS) CHECK INCLUDING THE BARRED LIST AND SOCIAL MEDIA CHECK	27
6.	OVERSEAS CHECKS	29
7.	LETTER OF PROFESSIONAL STANDING.....	30
8.	PROHIBITION FROM TEACHING CHECK	30
9.	PROHIBITION FROM MANAGEMENT CHECK.....	32
10.	EDUCATION WORKFORCE COUNCIL (EWC) REGISTRATION	32
11.	MEDICAL FITNESS CHECK.....	33
12.	DISQUALIFICATION	33
 APPENDIX 3: RECORDING & MONITORING NEW STARTERS.....		34
1.	NEW STARTER PROBATION CHECKLIST	34
2.	RECORDING ON SCR	34
3.	STAFF ANNUAL DECLARATION	35
4.	CHANGE OF EMPLOYMENT	35
 APPENDIX 4: RISK ASSESSMENT GUIDANCE		36
1.	RISK ASSESSMENT OVERVIEW	36
2.	DBS.....	36
3.	OVERSEAS CHECK.....	37
4.	LETTER OF PROFESIONAL STANDING	38
5.	DISCLOSURE.....	38
 APPENDIX 5: UNSUCCESSFUL CANDIDATES, EXTERNAL AND INTERNAL.....		40
1.	EXTERNAL CANDIDATES	40
2.	INTERNAL CANDIDATES	40

1. Purpose

- 1.1. The Safer Recruitment Policy explicitly details Cognita's position, standards and expectations associated with its commitment to safeguarding and promoting the welfare of children and expects all staff to share this commitment, wherever they work and in whatever role.
- 1.2. Cognita follows the UK Guidance on Safeguarding Children and Safer Recruitment in Education (2006), its replacement Keeping Children Safe in Education (September 2023), Disqualification under the Childcare Act 2018, the Independent Schools Regulatory Commentary for the Inspection of Schools (2020), Working Together to Safeguard Children (February 2019), the Hugh Davies QC; Southbank International School Recommendations (2014) and the Group benchmark of best practice for all its schools globally. In addition, for those schools within Wales, Cognita takes into consideration Keeping Learners Safe WAGC 265/2020.

2. Applicability

- 2.1. The following policy and procedure must be used for the recruitment and selection of all staff throughout the Cognita UK Group of Schools except if they should not be compliant with legal requirements in the country of employment.

3. Definitions and Scope

- 3.1. This Safer Recruitment Policy sets out our safeguarding responsibilities as an organisation recruiting staff to work with students and also provides group-wide, consistent and best practice recruitment procedures.
- 3.2. This policy must be read by any member of staff who is actively involved in the recruitment and selection of staff or who has a lead role in the safeguarding/child protection of students in a school. These members of staff are deemed to be part of the "Cognita Recruitment Community".
- 3.3. For compliance purposes, a signed copy of the SCR Champion Induction Checklist will need to be completed and retained in the employee file, for record-keeping purposes of anyone who is required to have read, understood and taken accountability for the contents of this document as well as completed all relevant training.
- 3.4. Safeguarding is an ongoing process and will continue throughout employment. Safer Recruitment is only the first step in the whole Safeguarding cycle and must be embraced as part of our wider commitment to Safeguarding and Child Protection.

4. Policy

- 4.1. Across the Cognita Group, we share a common objective to help keep students safe by contributing to:
 - providing a safe environment for students to learn and
 - taking appropriate action to keep them safe (where a risk is identified)
- 4.2. Achieving this objective requires systems designed to:
 - prevent unsuitable people working with students
 - promote safe practice and challenge poor and unsafe practice
 - identify instances where there are grounds for concern and take appropriate action
 - contribute to effective partnerships to provide services to students who may require third party intervention

- Create a culture and environment where staff feel comfortable, if appropriate, to discuss matters outside of work, which may have implications for the safeguarding of students in the workplace
- 4.3. Cognita continually implements strategies to ensure the best people are employed. The Seven Steps to Safer Recruitment have been created to deter and prevent unsuitable personnel from applying and/or being recruited. In order to achieve the aim, it requires recruiting teams, hiring managers, Heads of schools and any staff member deemed to be part of the Cognita Recruitment Community to adhere to the Seven Steps to Safer Recruitment.
 - 4.4. Hiring Manager's and school leaders must be clear about the expectations they place on staff, including where their relationships and associations both within and outside of the workplace (including online) may have implications for the safeguarding of students in school.
 - 4.5. Due to the reliance on the recruiting team taking personal accountability, disciplinary action will be taken, which may include termination of employment, against any employee, who is found to have breached this policy.
 - 4.6. When implementing Cognita's Safer Recruitment policy the Hiring Manager and schools will be mindful of and act in accordance with the school's Preventing Extremism and Radicalisation Policy. By complying with safer recruitment best practice techniques as set out in this policy and by ensuring that there is an on-going culture of vigilance within our schools, we aim to promote a culture of tolerance and respect and minimise the risk of students and/or members of staff being drawn into terrorism.

Equal Opportunities

- 4.7. Our policy is to treat job applicants and employees in the same way regardless of their gender, marital status, age, race, sexual orientation, gender reassignment, religion, pregnancy/maternity or disability and the sole criteria for selection or promotion will be an applicant's suitability for the role.
- 4.8. In turn, we expect our staff to recognise and respect the many different racial groups, religious cultures and languages represented by the children who attend our nurseries and schools, in order to help them to develop positive attitudes to diversity and to equip them to prevent them from being drawn into extremism or terrorism.
- 4.9. Our curriculum and activities will aim to utilise the richness this brings to the classroom and our organisation.

Levels of Responsibility

- 4.10. It is the Hiring Manager's responsibility to identify a vacancy, seek budgetary authority for the position and to produce a Role Profile for the role. Templates for Role Profiles are available on the Safer Recruitment Toolkit.
- 4.11. The [vacancy must be added to the Current Academic Year's Vacancy List \(Via Teams\)](#) and must be approved prior to any recruitment activity including advertising, engaging with external agencies, interviewing or making verbal or written job offers. This is to ensure the new position and recruitment costs are within the approved budget.
- 4.12. Applicants or colleagues should never be informed of the outcome of the recruitment process until it has been completed.

Professional Standards

- 4.13. Strict confidentiality must be maintained at all times by those who participate in the recruitment process. Confidential documents containing applicant details, application form, interview notes, employment offers etc. must be securely filed away in accordance with the Document Retention Policy.
- 4.14. Declaration of close personal or financial relationships with any applicant must be made to the Hiring Manager. Anyone in this category will not be allowed to participate in the recruitment decision (this excludes ordinary working relationships).

5. Related Policies, Guidelines, Templates and Forms

- Disciplinary Action Policy
- Equality and Diversity Policy
- Performance Improvement Policy
- Preventing Extremism and Radicalisation Policy (Education Policy)
- Safeguarding and Child Protection Policy and Procedure, including allegations against adults
- Whistleblowing Policy (included in the Code of Conduct for Staff and Volunteers)
- Code of Conduct for Staff and Volunteers including Acceptable Use Policy (Education Policy)

6. Step 1: Safer Recruitment Training

- 6.1. It is best practice for those involved in the Recruitment Process to have successfully completed [Safer Recruitment Training](#) and have obtained the Certificate in Safer Recruitment by [NSPCC](#) (link below). At least one of the Interview Panel Members must have completed Safer Recruitment Training.
- 6.2. We believe Safer Recruitment Training further strengthens and safeguards students in schools by helping to deter and prevent abuse, this is also a mandatory requirement for all Cognita employees who have a lead role in the safeguarding/child protection of students in a school. Refresher training must be completed every two years.
- 6.3. The online training is currently available from the NSPCC eLearning Portal (content formally managed by the UK Department for Education) and needs to be refreshed every two years, via; <https://learning.nspcc.org.uk/training/safer-recruitment-education>

7. Step 2a: Role Profiles

- 7.1. [Role Profiles](#), including the Person Specification should be reviewed for each new vacancy and must include the main duties, responsibilities, experience and behaviours specific to the needs of the role.
- 7.2. Role Profiles must set out the safeguarding requirements of the role (setting out the extent that the role will involve contact with children and whether the individual will be engaging in regulated activity relevant to children). It must also include a statement about the individual's responsibility for promoting and safeguarding the welfare of children s/he is responsible for, or comes into contact with, as below:
 - To comply with safeguarding policies, procedures and code of conduct
 - To demonstrate a personal commitment to safeguarding and student/colleague wellbeing
 - To ensure that any safeguarding concerns or incidents are reported appropriately in line with policy
 - To engage in safeguarding training when required

8. Step 2b: Advertisements

- 8.1. When advertising a role, either internally or externally, it is important to outline the requirements in terms of the duties and responsibilities, the experience/background needed, and the personal qualities sought, including setting out the safeguarding responsibilities of the post.
- 8.2. The [advertisement](#) should then be written to reflect these in a way that makes the position attractive to applicants, but also has sufficient benchmarks to dissuade those who clearly do not have the required skills from applying.
- 8.3. Cognita actively encourages internal moves and promotion, but also reserves the right to advertise externally in the quest to find the best person for the job. This decision should be made between the Hiring Manager and the Head.
- 8.4. Advertisements should always include the following abridged Commitment Statement which sets out Cognita's commitment to safeguarding children:

“Cognita Schools are committed to safeguarding and promoting the welfare of children and young people and expects all staff, volunteers and other third parties to share this commitment. Safer recruitment practice and pre-employment background checks will be undertaken before any appointment is confirmed.”

9. Step 3: Scrutinising, Shortlisting and Interviewing

- 9.1. The detailed [Safer Recruitment Procedure for Scrutinising, Shortlisting and Interviewing](#) is set out in [Appendix 1](#).
- 9.2. Applicants, both internal and external, must use Cognita's [Application Form](#) to apply for a vacancy in order to comply with the Safer Recruitment Policy.
- 9.3. It is the responsibility of those who are nominated within the schools or those responsible for the Recruitment process to carry out a [basic social media](#) search via google for all shortlisted candidates.
- 9.4. Applicants should provide their [full employment history](#) in the application form since the age of 16 including education, employment and voluntary work.
- 9.5. Where there are [gaps in employment](#), a note of this should be made, further clarifications sought and used in consideration of whether to short list the applicant.
- 9.6. Applicants should give a [minimum of two professional reference](#) contacts from two separate employers on the Application Form: and include the most recent employer and the most recent employment working with children (if different). If the applicant has never worked with children, a reference must be obtained from their current employer.
- 9.7. Additional references where required should be included on the Application form.
- 9.8. The [Invite to Interview Letter](#) should be sent with the [Self Declaration Form](#), that needs to be completed and sent prior to the interview. Any declarations on this form need to be reviewed and clarified during the interview.

- 9.9. Applicants should be asked to bring [three original documents](#), a copy of which must be kept on the employee file and the person verifying the documents must sign and date the copies; one of which needs to be the evidence proving their Right to Work in the UK.
- 9.10. It is [mandatory to have a minimum of two interviewers](#); in some cases there may be more depending on the role. At least one member of the panel should have completed NSPCC Safer Recruitment Training.
- 9.11. [Interview Panels](#) should agree and understand the required standard for the role they are appointing, using the Interview Questions Template; clear [interview notes](#) should be made and retained on file.

10. Step 4: Offer letter & Contract of Employment

- 10.1. There are a number of references/clauses in the offer letter and contract of employment which enable the management of a new employee's suitability to work with children. Both documents should record that the offer is subject to the receipt of satisfactory background checks.
- 10.2. The [Template Offer Letter](#) and [Contract of Employment](#) must be used in order to satisfy the conditions of employment relating to safeguarding.
- 10.3. The initial period of employment enables an observed judgement of an applicant's suitability to work with children and capability for the role. Please refer to [Step 7: Probationary Period Including Induction](#) for further information.
- 10.4. All shortlisted candidates are required to give full details of convictions and cautions, including those which would otherwise be considered "spent" by virtue of the said Act.
- 10.5. Teaching staff are expected to conduct themselves in line with the following:
 - the DfE professional standards in England
 - the Welsh Government Guidance (revised) Professional Standards for Education Practitioners in Wales 020/2011
- 10.6. All applicants will be required to sign a Safeguarding Declaration within the Contract of Employment to evidence their commitment.

11. Step 5: Background Checks

- 11.1. The detailed [Safer Recruitment Procedure for Background Checks](#) is set out in [Appendix 2](#), and include:
 - Acceptable References and Basic Internet/Social Media checks
 - Confirmation of Medical fitness
 - Enhanced DBS, Barred Checklist, Overseas checks
 - Identity and Right to work checks
 - Prohibition from Teaching and/or Management, and Disqualification confirmation
- 11.2. An offer of employment must be conditional upon all background and pre-employment checks being completed. All checks should be completed and recorded in writing, retained on the employee's employee file, independent of the shortlisting and interviewing panel.
- 11.3. A summary of the checks must be recorded on the [Single Central Record \(SCR\)](#).

- 11.4. All background and pre-employment checks as applicable to the role, must be completed before an applicant takes up the post, this may result in delaying the commencement of employment. As a reminder, DBS for checks on volunteers are free.
- 11.5. Any exceptional permission to appoint without all background and pre-employment checks being completed is the responsibility of the Head and subject to a [Risk Assessment](#) (see [Appendix 3](#) for further details) including steps to ensure mitigating arrangements, which will include appropriate supervision and restrictions on certain types of activity (such as school trips).
- 11.6. If any of the information contained in the pre-employment checks is unsatisfactory or has discrepancies, this should be followed up by the Hiring Manager, and Head, supported by SCR Champion. Any disclosure information relating to a conviction should be notified to the relevant signatories as per the Risk Assessment Flow for careful consideration and review of suitability to the post.
- 11.7. A decision not to appoint someone due to their conviction(s) should be clearly documented, so if challenged, the decision can be defended, in line with the appropriate policies. Serious, deliberate fraud or deception in connection with an application for employment may amount to a criminal offence. In such cases the employer should, in addition to any planned disciplinary action, consider reporting the matter to the relevant authorities and/or regulators. The Regional CEO will be notified of any reporting to relevant authorities and/or regulators.
- 11.8. To assist you keeping track of this process, please use the [New Starter & Probation Checklist](#) as relevant for Employees and Non Employees.

12. Step 6: Recording & Monitoring New Starters

- 12.1. The detailed [Safer Recruitment Procedure for Recording and Monitoring New Starters](#) is set out in [Appendix 4](#).
- 12.2. Schools must keep a [The Single Central Record \(SCR\)](#) to evidence they have carried out the range of checks required by law on their staff and include current members:
 - All staff directly employed at the School
 - All long term supply, agency staff and daily supply
 - Volunteers who work regularly with children or carry out unsupervised activity with children
 - Trainee or student teachers
 - All who are engaged in “Regulated Activity”
 - Personnel who are not staff members but provide regular teaching or instruction such as tutors, coaches, Peris
 - Regular contract staff such as caterers and cleaners
 - Visitors and Central Head Office staff who visit on a “Regular” basis
 - Proprietors, Governors, Education Advisors
- 12.3. Regularly is once a week, on four or more days in a 30-day period or overnight.
- 12.4. All roles with Cognita are defined as “Regulated Activity” and include:
 - teaching, training, instructing, caring for or supervising children if the person is unsupervised or providing advice or guidance on wellbeing, or driving a vehicle only for children, or engaged in overnight activity, even if this happens only once
 - work for a limited range of establishments (known as “specified places” which includes schools and colleges) with the opportunity for contact with children, but not including work done by supervised volunteers

- Work under the above is regulated activity only if done regularly

12.5. The Head is responsible for undertaking [bi-weekly sampling](#) of staff files to ensure compliance to this policy, using the [Heads Checklist for Sampling Records](#) and keeping an ongoing record of sampled files using [Safer Recruitment Headteacher's Check](#). Twice yearly reviews of Schools SCR's will be completed by external safeguarding reviewers.

12.6. The [SCR](#) must contain the following fields:

- Full name, position and start date
- Identity check
- Medical fitness declaration
- Enhanced DBS
- Barred List Check (aka as List 99)
- Qualifications
- References
- Right to Work in the UK
- Overseas checks (if applicable)
- Disqualification from childcare (if applicable)
- Prohibition from Teaching (if applicable)
- Prohibition from Management check (if applicable)
- Social Media (Basic Internet Search and/or additional Social Media Check)
- Employment History - Application Form
- Additional Notes
- Registration with Education Workforce Council (Wales – if applicable) expiry date to be included in Additional Notes
- Risk Assessments (if applicable)

12.7. [Risk Assessments](#) (refer to [Appendix 3](#) for further details) can only be raised for some of the background checks and in exceptional circumstances, when a check has not been fully completed as follows, they will need to be discussed, reviewed on a regularly basis and closed off as soon as possible, with reasonable mitigation in place:

- DBS check
- Overseas check
- Letter of Professional Standing
- Disclosure on Disclosure and Barring Certificate

12.8. All Risk Assessments must be categorised as one of: [Low](#), [Medium](#) or [High](#), as per the guidance in [Appendix 3](#) and decisions based on the category.

12.9. For any changes in position, location and/or employment status, due consideration must be given to existing checks and if necessary complete new and/or additional checks as relevant.

13. Step 7: Probation Period & Induction

- 13.1. An induction programme should be made available to all new staff, regardless of role or previous experience. The purpose of the induction is to:
- Provide training and information about the School and Cognita's policies and procedures including the vision and values, objectives and ethos, with specific reference to safeguarding and promoting children's welfare, including child protection.
 - Support individuals in a way that is appropriate for the role to which they have been appointed;
 - Confirm the conduct that is expected of staff (Cognita's Code of Conduct for Staff and Volunteers including Acceptable Use Policy)
 - Provide opportunities for new members of staff to discuss any issues/concerns about their role or responsibilities
 - Enable the new member of staff's Line Manager to recognise any issues/concerns about the person's ability or suitability at the outset and address them immediately.
- 13.2. The content and nature of the induction process will depend upon the role and previous experience of the new member of staff, but must include the information on the policies and procedures in relation to safeguarding and promoting the welfare of children e.g.:
- (Education) Safeguarding and Child Protection Policy and Procedure; which should also cover;
 - Safe practice and the standards of conduct and behaviour expected of staff and students in the School
 - How and with whom any concerns about those issues should be raised
 - (HR) Other relevant employment procedures which should include;
 - Disciplinary, performance improvement and whistleblowing procedures
 - Equal Opportunities Policy and the wider Employment Handbook
- 13.3. An [Induction Checklist](#) provides the means to document that safeguarding was covered in the first week of employment as a further demonstration of the school/Cognita's commitment to safeguarding our students. This [Induction Checklist](#) should be completed for each member of staff and filed in the employee file.
- 13.4. The induction programme should also include Child Protection Training appropriate to the new member of staff's role to ensure their full understanding of their safeguarding responsibilities. In addition, this will help ensure they best understand the school/Cognita's commitment to safeguarding and promoting the welfare of children.
- 13.5. The new member of staff will be required to complete the [Staff Annual Declaration](#) upon joining the school and on an annual basis. This will need to be done via Cognita People for all employees; a paper form will need to be used for all Non Employees, and retained on their files.
- 13.6. The initial period of any new role is inevitably a time of adjustment during which the new starter becomes acquainted with a new environment, different working practices, routines and standards of performance. This will take time and to enable both parties to realistically assess suitability for the role, as such all new starters employment is subject to a probationary period (the length is role dependant).
- 13.7. Performance will be monitored and discussed throughout this period including a formal review meeting to discuss how both parties feel about the role, school/department/Company and progress made in position and to ensure positive relationships with colleagues, students and parents have been made.

- 13.8. If the school/Company is not satisfied that the necessary level of performance has been reached during the probationary period and/or there are some other concerns, the probation may be extended. In some instances, either party may decide to give notice to terminate employment (which is usually a shorter period during this time).
- 13.9. A new member of staff whose role requires them to be involved in the Recruitment process must undertake [Safer Recruitment Training by NSPCC](#) during their Probation Period.
- 13.10. The probation period is also a significant period during which the new starter's attitude to safeguarding should be assessed. No appointment should be confirmed until the Line Manager is satisfied that the new starter fully understands and embraces the school's safeguarding philosophy and understands their own personal accountability. This understanding must be confirmed by the line manager on the Probation Review form.
- 13.11. The [Probation Review Form](#) should be used to document the discussion and conclude the probationary period. No confirmation of successful completion of the probationary period should be issued if there is still an outstanding check required.
- 13.12. If any information regarding an applicant comes to light through the recruitment and selection process it should be discussed between the Head and school SCR champion, or at any point during the employment, to suggest that they may have harmed or pose a risk of harm to a child or vulnerable adult the matter should be discussed with the Head, relevant signatories on the Risk Assessment Flow, Safeguarding Lead and Head of HR immediately to ensure we meet our legal duty to refer a 'cause for concern' of this nature to the relevant third parties.
- 13.13. This obligation regarding the legal duty to refer a "cause for concern" extends beyond the recruitment and selection process and applies to any volunteers, trainee teachers, supply staff, those on fixed term contracts, resignations, voluntary withdrawal and all contract workers. All such instances will be disclosed to the signatories on the Risk Assessment flow so that the Proprietor exercises their duty appropriately. In addition, all such instances will be disclosed to any external inspector as required. This process may also be exercised via twice-yearly safeguarding review meetings, undertaken by external reviewers.
- 13.14. We also follow the Teacher Misconduct: The Prohibition of Teachers (April 2018) where referral to the Teaching Regulation Agency is required.
- 13.15. Where a formal process has been completed for those registered on Education Workforce Council, a notification is required to be sent to them.

14. Safer Recruitment Procedure for Non-Employee Groups

- 14.1. In order to safeguard the students in our care we require a similar rigorous approach to recruitment for all non-employee Groups.
- 14.2. Schools are responsible for obtaining written notification from any agency or third-party organisation that present staff to work within the school that they have completed all the checks we would have undertaken if employing directly, and completing a Level Check Form.
- 14.3. Where the agency or third-party organisation has obtained an enhanced DBS certificate before the person is due to begin work at the school, which has disclosed any matter of information, or any information was provided to the agency or third-party organisation, the school must obtain a copy of the certificate from the agency or third-party organisation.

- 14.4. Where the position requires a children's barred list check, this must be obtained by the agency or third-party organisation by obtaining an enhanced DBS certificate with barred list information, prior to the appointment of the individual.
- 14.5. The school must also conduct their own identity check to ensure that the person presenting for work at the school is one and the same person for whom the third-party organisation have confirmed the checks have been undertaken.
- 14.6. Under no circumstances should any non-employee in respect of whom no checks have been obtained, be left unsupervised or allowed to work in regulated activity. To this end guidance has been produced for third party contractors and non-employees (including supply, the self-employed and volunteers) and available in the SCR Toolkit.

15. Safer Recruitment Procedure – Visitors

- 15.1. To safeguard students in our care, robust process needs to be followed for all individuals who are not on SCR, refer to Section 12 for details.
- 15.2. All visitors should report to Reception and sign in using a current ID Lanyard issued by employer organisation and photographic evidence.
- 15.3. Upon signing in, visitors will be issued with a badge, and advised of safeguarding, health and safety and fire safety procedures and signposted to relevant facilities they are able to access. School badges must be worn at all times with current lanyards (where applicable) and should be:
 - Green – current Cognita staff with green lanyard
 - Green – current Cognita staff with temporary pass, issued centrally
 - Green – Healthcare professionals with green lanyard from employer organisation such as NHS
 - Red – other visitors
- 15.4. Visitors on red badge should be escorted from point of contact and fully supervised at all times.
- 15.5. Visitors departing should sign out from Reception and hand back their badges.
- 15.6. Any visitor who is not wearing a badge or is on red badge and unaccompanied should be challenged politely and escorted to Reception to complete the safer recruitment procedure for visitors.

16. Compliance

- 16.1. All those involved in the Recruitment process or who have a lead role in the safeguarding/child protection of student in a school, will need to complete SCR Champion Induction checklist and sign to state they have read understood the policy and completed all relevant training.
- 16.2. Those who are nominated as being responsible for the issue of lanyards, will ensure these are returned and destroyed as part of the Off Boarding process for those leaving employment. Temporary pass will include expiry dates.
- 16.3. Regular sampling as identified in OASR Governance will be completed and remedial action taken as necessary.

- 16.4. If any provision of this Policy is or becomes illegal, void or invalid, that shall not affect the legality and validity of other provisions.
- 16.5. Appendix 5 details guidance for unsuccessful candidates, for whom parts of the Safer Recruitment Process would have been completed.

Appendix 1: Scrutinising, Shortlisting & Interviewing

1. Introduction to Scrutinising, Shortlisting and Interviewing

1.1 There are different ways to scrutinise applicant information, to help shortlist right candidates to invite for interview. The table below details things to look out for.

Application Form	<ul style="list-style-type: none"> • Incomplete information • Overlapping Dates • Lived or worked overseas • Inconsistent Information
Social Media and/or Basic Internet Search	<ul style="list-style-type: none"> • Cover all countries • Cover all names previously known as • Contradictory Information • Information causing reputational damage
Employment	<ul style="list-style-type: none"> • Full History • Gaps more than 3 months clarified • Dates consistent
References	<ul style="list-style-type: none"> • Professional email for different employers • Most recent & most recent working with children if different + current • Teaching – 2 before interview • Non-Teaching – 1 before interview
Interview Invite	<ul style="list-style-type: none"> • Self Declaration Form • Invitation to include date, time, location, directions • Request to bring original documents • Details of selection process including safeguarding
Self Declaration	<ul style="list-style-type: none"> • Nature, seriousness & relevance – circumstances • Changes in personal circumstances • How long ago, circumstances around committing, country
Interview Preparation	<ul style="list-style-type: none"> • Interview Panels & NSPCC Safer Recruitment Training • Interview Templates • Identify areas to explore from application & self declaration form • Areas to explore from references & internet search
Identity	<ul style="list-style-type: none"> • 3 original documents as acceptable for DBS • Right to work evidence • Overseas police checks if applicable • Proof of address
Professional Qualification	<ul style="list-style-type: none"> • Original certificates as applicable to role

2. The Application Form

2.1 Applicants, both internal and external, must use Cognita's [Application Form](#) to apply for a vacancy in order to comply with the Safer Recruitment Policy. This ensures a common set of core data from all applicants is received. It is not good practice to accept a CV drawn up by the applicant in place of an Application Form because this will only contain the information they wish to present and may omit relevant details (however, CV's can be accepted in addition to an Application Form.)

2.2 It is unacceptable for an applicant to be appointed in the absence of a fully completed signed Application Form. When an Application Form has been submitted electronically with only a typed

name in the signature box, an applicant invited to attend an interview should be asked to sign the Application Form as part of the background compliance checks undertaken on the interview day or their first day of employment.

- 2.3 Application Forms must be supported by the Self Declaration Form by the applicant that they are not barred, disqualified from teaching or subject to sanctions where applicable and where a role envisages engaging in regulated activity, a statement making it clear that it is an offence to apply for the role if the applicant is barred from engaging in regulated activity relevant to children.
- 2.4 A copy of Cognita's Safeguarding and Child Protection Policy and Procedure, including allegations against adults and policy on employment of ex-offenders, should be included on the Careers page of the Cognita website.
- 2.5 A minimum of two people are required to shortlist applicants to avoid bias of opinion or prejudice in the process.
- 2.6 Applicants should be asked to sign a declaration on the Application form, to confirm that the information they have provided is true. Where there is an electronic signature, the shortlisted candidate should physically sign a hard copy of the application when attending the interview.

3. Basic Internet Search & Social Media Search

- 3.1 Applicants are informed on the Application form, Application form guidelines and interview invite letters that a basic internet and/or social media check will be completed prior to the interview.
- 3.2 It is the responsibility of those who are nominated within the schools or those responsible for the Recruitment process to carry out a basic social media search via google for all shortlisted candidates. This can be done by typing the full name of the shortlisted candidate on google, which shows any information that may need to be checked further as applicable.
- 3.3 Successful candidates may be subject to additional social media check being completed. Both these searches will help to identify the applicant's/successful candidate's online identity and determine whether there may be any reputational risk to the school/Cognita based on comments made by or about them online. Any information requiring further consideration should be discussed with the applicant and noted on the summary report from the interview documenting the considerations made. Information relating to the personal protected characteristics of the applicant (e.g. their race or sexual orientation) will not be taken into account in considering their application.
- 3.4 Searches should cover all countries where the applicant has lived and/or worked to ensure a full picture of their past is captured.

4. Full Employment History and Gaps in Employment History

- 4.1 Applicants should provide their full employment history in the application form since the age of 16 including education, employment and voluntary work.
- 4.2 All Application Forms should be scrutinised to ensure they are fully and properly completed and that the information provided is consistent and does not contain any discrepancies, including identifying any gaps in employment.
- 4.3 For any gaps in employment, a note of this should be made and used in consideration of whether to short list the applicant. Together with obvious gaps in employment, the reasons for a history of repeated changes of employment without any clear career or salary progression should be explored and verified. This can also include a mid-career move from a permanent role to supply teaching or temporary work.

5. Self Declaration Form

- 5.1 Shortlisted applicants should be asked to complete a self declaration form, which includes details of their criminal record or information that would make them unsuitable to work with children.
- 5.2 This information should only be requested from an applicant who is shortlisted and not in the Application Form to decide who should be shortlisted.
- 5.3 The purpose of the self declaration is to enable applicants to share any relevant information, to be discussed and considered at interview and before the DBS certificate is received.

6. References

- 6.1 Applicants should give a minimum of two professional reference contacts from two separate employers on the Application Form. A key purpose of the reference is to verify the applicant's suitability to work with children. These reference contacts must therefore include the most recent employer and the most recent employment working with children (if different).
- 6.2 If the applicant has never worked with children, a reference must be obtained from their current employer. Where there is no current employer, verification of the most recent employer should be sought. Reasons for leaving former employers should also be obtained. Referees should be asked as a minimum whether they are aware of any reason or have any concern that the applicant may not be suitable to work with children.
- 6.3 References should be sought on all short-listed school-based applicants, including internal ones and should be from a senior person with appropriate authority within the organisation. If the referee is school or college based, the reference should be confirmed by the headteacher or principal as accurate in respect of any disciplinary investigations. Information should be verified with the referee and any vague or insufficient information contained in a reference must be clarified with the referee.
- 6.4 The School must request all written references directly from the referee. [Schools should not rely on applicants to obtain their references](#). Cognita does not accept an open reference as part of the recruitment process e.g. "to whom it may concern". A minimum of two returned and satisfactory references are required on each employee file.
- 6.5 As a rule, character references are not acceptable; this includes references from relatives or people writing solely in the capacity of friends. If there is a good reason the applicant cannot supply the requisite number of referees (e.g. because they are recent graduates or have only held a small number of jobs), references may be sought from high quality alternatives (e.g. University tutor).
- 6.6 References should be requested using the [Employer Reference Request Form](#) and the [Reference Request Letter](#). If a reference is received electronically and has not been signed by hand by the referee, evidence must be sought and retained in the employee file to demonstrate that the reference was provided by the expected referee and email address.
- 6.7 All job offers are conditional upon receipt of minimum of two satisfactory references (including most recent employment working with children if not covered already) and any appointment must not be confirmed until all required references have been received.
- 6.8 Where there are exceptional circumstances:
 - Candidate has worked in the same job and/or organisation for many years, and unable to provide different employer reference, Character Reference can be requested as 2nd reference
 - Candidate has had a career break, or returning from extended family leave, most recent employment reference and Character Reference can be requested

7. References - Teaching staff

- 7.1 Prior to the interview, it is best practice for all permissible references to be requested for shortlisted applicants, taking into account whether the applicant has requested that their current employer should not be contacted at this stage.
- 7.2 Prior to the interview, at least two written references must be requested for shortlisted applicants. Where possible, best endeavours must be made to ensure these are received and scrutinised before the interview.

8. References - Non-Teaching school-based staff

- 8.1 Prior to the interview, at least one written reference must be requested for shortlisted applicants. This does not have to include the current or most recent employer at this stage, the Application Form asks if the referee can be contacted prior to interview for this reason.
- 8.2 Once the successful applicant has been offered the role, the second reference must then be requested, including from the current or most recent employer if this was not obtained before the interview, in order to complete the reference process.

9. Concerns from a Reference

- 9.1 All references should be scrutinised by the Hiring Manager upon receipt and special attention paid to questions regarding disciplinary issues, suitability to work with children, re-employment and whether the dates of employment, role and duties match the information supplied on the Application Form. Referees should be contacted for a follow-up conversation if any of these elements are unclear or give cause for concern. Notes of the conversation should be made and dated and retained on the applicant's employee file. Any issues of significant concern should be escalated to the Head. Any concerns should be resolved satisfactorily before appointment is confirmed.
- 9.2 Where an individual has not listed relevant or logical referees the school may ask the applicant to provide more suitable referees and/or should consider contacting those referees who have not been listed. Any such contact should be discussed with the applicant in advance, documented, dated and included in their employee file if they are subsequently appointed. Reasons for leaving former employers should also be obtained.
- 9.3 In the event that suitable references cannot be obtained, the matter should be escalated to the schools Head for advice on how to proceed prior to any job offer being made.

10. Invitation to Interview

- 10.1 The [Invite to Interview Letter](#) should include; the date, time and place of the interview, directions to the venue, names of those people on the interview panel, details of the selection process, the full-length Safeguarding Commitment statement and a statement that the interview will include

questions relating to safeguarding. The letter will also include information relating to Basic Internet and/or Social Media Search being done prior to interview.

- 10.2 This should be sent with the [Self Declaration Form](#), that needs to be completed and sent prior to the interview. Any declarations on this form need to be reviewed and clarified during the interview.
- 10.3 Applicants should be asked to bring three original documents, a copy of which must be kept on the employee file and the person verifying the documents must sign and date the copies; one of which needs to be the evidence proving their Right to Work in the UK
 - two confirming their identity i.e. a current driving licence, passport and/or birth certificate (one of which must include their photograph)
 - plus, one document confirming their current name and address such as a utility bill (not mobile phone) or financial statement (dated within the last three months). It is not permissible for applicants to offer photocopied documents for the purposes of identity checking

11. Interview Preparation – Selection Process

- 11.1 In order to help select the most appropriate applicants a number of different selection techniques may be deployed. In all cases, there should be an interview and this can be complemented by a carousel format such as; assessments, numeracy and/or literacy tests, a lesson observation and/or case study/presentation, student panel/staff panel, tour etc. For school-based teaching roles, it is good practice to involve students in the recruitment and selection process in some way, so that applicants' interaction with them can be observed (although under no circumstances should an applicant be left unsupervised with students of any age during the recruitment process). If appropriate, the final decision may be reached via a second interview.
- 11.2 Where appropriate, select work-based assessments, exercises or personality profiling to further assess an applicant's suitability for the role. Please contact the HR department in the first instance to ensure suitability.
- 11.3 It is important to prepare thoroughly prior to beginning the selection process, and the interview content is a key part of this. It is important to identify who should be involved in the selection process, assigning responsibility and setting aside sufficient time for the work needed at each stage. This ensures all elements of recruitment safeguards are not rushed or overlooked.

12. Interview Preparation – Interview Panel

- 12.1 It is mandatory to have a minimum of two interviewers, and in some cases, i.e. for senior or specialist roles, a larger panel might be appropriate. A recruitment panel allows for at least one member to observe and assess the applicant, and the other to make notes. It also allows for the corroboration of events within an interview should an applicant attempt to bring a claim for an alleged breach of process or legislation within the recruitment process. A Hiring manager who interviews alone does not have such a defence.
- 12.2 The members of the interview panel should meet before the interview to:
 - agree and understand the required standard for the role to which they are appointing
 - consider the issues to be explored with each applicant and who on the panel will ask about each of those
 - agree the assessment criteria in accordance with the Role Profile and Person Specification
 - review the [Interview Template](#) to select the relevant questions for the post, ensuring Safeguarding questions are a focus
- 12.3 The Hiring Manager should also consult others involved in the selection process, such as teachers involved in the lesson observation, tours or informal meetings to obtain their feedback,

and collate and assess any associated paperwork. These should be incorporated into the summary or interview record documentation as required.

12.4 Clear notes on the interviews should be made and retained on the file.

13. Verify Identity

13.1 When verifying identity, those responsible are aiming to corroborate the person's full name, including forenames and last name, date of birth, and full permanent address, one of which needs to be in a photographic form of identity such as passport or drivers licence.

13.2 Where an applicant claims to have changed his or her name by deed poll or any other mechanism (e.g. marriage, adoption, statutory declaration) he or she is required to provide documentary evidence of the change.

13.3 A copy of the documents used to verify the successful applicant's identity and address must be kept on their employee file for record-keeping purposes and the person verifying the documents must sign and date the copies.

13.4 Identity verification within our Welsh schools also includes the requirement to obtain details of the applicants National Insurance Number.

13.5 A minimum of 3 documents should be verified, as per guidance on acceptable list, [Acceptable Documentation | Help Hub | Matrix Security Watchdog](#)

- Proof of Address
- Proof of Identity
- Proof of Right to Work

14. Verify Professional Qualifications

14.1 Applicants must also be asked for evidence of their educational or professional qualifications that are necessary or relevant for the role (i.e. the original or certified copy of a certificate, or diploma, or a letter of confirmation from the awarding body). If the applicant cannot produce original documents or certified copies, written confirmation of his or her relevant qualifications must be obtained from the awarding body (for teaching positions) prior to the appointment being confirmed.

14.2 A copy of the qualifications must be kept on the employee file and the person verifying the documents must sign and date the copies.

15. Interview - Scope of Interview, Outcome & Regrets

15.1 The interview should assess the merits of each applicant against the role requirements. It is important to ensure that the interview process adopted for internal applicants is exactly the same as that for external applicants for the same role. It is also very important to explore each applicant's suitability to work with children.

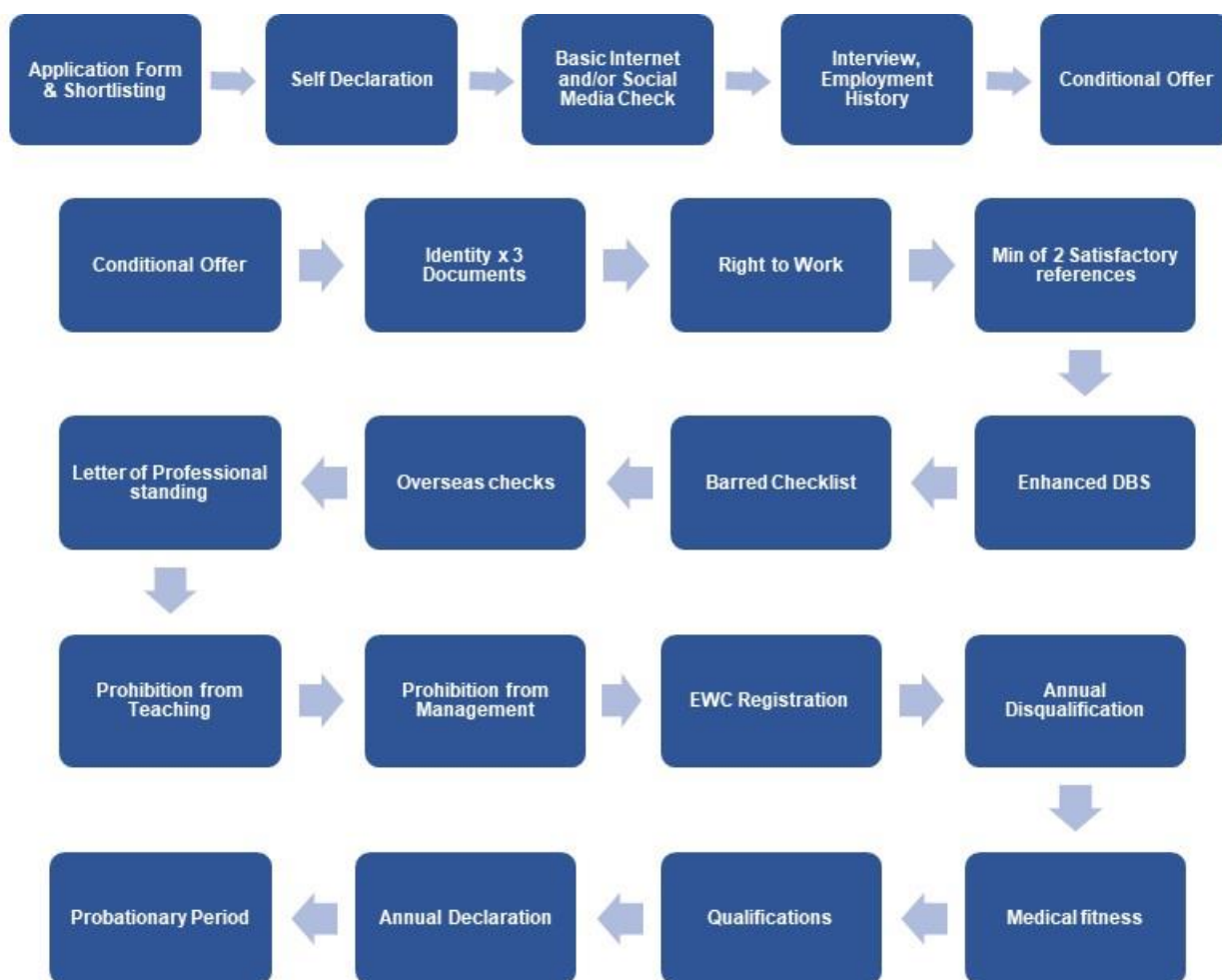
15.2 Each applicant must be given a fair and equal opportunity to demonstrate that they have the skills, experience and personal attributes that are being sought. Questions should also be asked around what attracted the applicant to the role being applied for and their motivation for working with children. The selection process should reflect the requirements of the role, the necessary competencies to be successful in the role, and the personal qualities appropriate to the environment.

15.3 All applicants should be tested in the same areas and should convincingly reach the level that was expected at the outset. An applicant should not be recruited based on being the 'best of the

group', they should be the best person for the role. This may require commencing the search again if a suitable applicant is not sourced from the original search.

- 15.4 Having agreed the interview questions the panel will explore any issues with each applicant, based on the information provided in the Application Form and references received (including any gaps in employment or where the applicant has changed employment or location frequently, the reasons for this). An applicant's response to a question will determine whether and how that is followed up.
- 15.5 It is better to ask behavioural based questions which ask an applicant to relate how s/he has responded to or dealt with an actual situation in the past, or questions that test an applicant's attributes and understanding of key issues.
- 15.6 **Interview notes** should be taken by all panel members and collated at the end of the interview by the Hiring Manager. Interview notes should be legible and cover all key topics discussed during the interview. At the very least the Hiring Manager should prepare a legible or typed summary of the interview covering the points listed in this section. Furthermore, the Hiring Manager should make summary comments as the responsible person.
- 15.7 Interview notes for the successful applicant should be retained securely on their employee file for record-keeping purposes for the duration of their employment and any required statutory period of time thereafter.
- 15.8 Please note, for Head recruitment, all interview notes must be collated by the Hiring Manager and passed to the HR Department for secure and confidential filing. These documents may be made available to external reviewers or inspectors.
- 15.9 In addition to assessing and evaluating the applicant's suitability for a particular role, it is imperative that safeguarding questions are asked at interview to ensure the filtering process of unsuitable applicants, but also to gain an insight into the knowledge, experience and attitude of the applicant towards safeguarding, as this information can facilitate early training requirements upon commencement of role.
- 15.10 The interview panel should therefore explore, document and report to the line manager:
 - the applicant's attitude towards children and young people
 - his or her ability to support the School's policy for safeguarding and promoting the welfare of children
 - gaps in the applicants' employment history
 - periods of time spent overseas
 - concerns or discrepancies arising from the information provided by the applicant and/or a referee
- 15.11 All applicants invited to interview are entitled to a meaningful interview irrespective of any change in circumstances (e.g. change of budget; identification of a preferred applicant; answers to early questions are poor) which might tempt the Recruiting Panel to abbreviate the process. This maintains a professional image of the school, of Cognita and will to some extent protect from potential claims of an unfair process.
- 15.12 The recruitment decision should be based purely on the criteria required, so any outcome can be explained constructively to the unsuccessful applicants. Any feedback that can help them should be given honestly and, for internal applicants, learning and development areas may be identified. The HR Department can assist with ensuring this feedback is constructive.
- 15.13 It is essential that the successful applicant is either told after the regrets or in confidence until all the outcomes are known. It is the Hiring Hiring Manager's responsibility to ensure that this process is controlled effectively.

Appendix 2: Background Checks



1. Background Checks Introduction

1.1 An offer of employment must be conditional upon:

- the receipt of satisfactory written references (Refer to Appendix 1, Section 6 on References)
- verification of the applicant's identity (if that could not be verified at the interview)
- right to work in the UK
- an Enhanced Disclosure and Barring Service (DBS) check, (paper copy) must be shown to the ID checker by the applicant before starting work. An Enhanced DBS with Barred List check is required for people working in regulated activity and this is the default set up for Cognita's online application service with Capita. Information disclosed on the certificate should be checked with any information shared by the applicant during the recruitment process
- Basic internet and social media check
- the receipt of criminal records checks for all other countries in which the applicant has lived or worked for three months or more in the past ten years (if applicable) and for the country they completed their teacher training in (if not the UK)
- the receipt of a Letter of Professional Standing (if teaching and previously taught overseas)
- Prohibition from Teaching check (if applicable)
- Prohibition from Management check (if applicable)

- Registration with Education Workforce Council (EWC) (if applicable)
 - signed annual disqualification declaration (if applicable)
 - verification of the applicant's mental and medical fitness
 - verification of appropriate qualifications/professional status (where required)
 - satisfactory completion of the probationary period
- 1.2 All checks should be recorded in writing, verified (date and signature) documented and retained on the employee's employee file. A summary of the checks must be recorded on the [Single Central Record \(SCR\)](#). Records for Head teachers will show on both the regional office and schools SCR's. An SCR Tracker is used to verify and track compliance to the policy.
- 1.3 The above checks must be completed before an applicant takes up the post, this may result in delaying the commencement of employment. The only exceptions to checks are:
- DBS check
 - Overseas check
 - Letter of Professional Standing
 - Disclosure on Disclosure and Barring Certificate
- 1.4 Any exceptions to all checks being completed must be discussed with the Head, School SCR Champion and relevant Education Advisor (EA) or General Manager (GM) or Executive Head as per Risk Assessment Flow and signed. Additionally this must be reviewed every two weeks and closed off as soon as possible.
- 1.5 Any exceptional permission to appoint without all background checks being completed, is the responsibility of the Head and subject to the following conditions:
- Any missing checks **must** have been applied for and evidenced
 - a Barred List check **must** have been completed and confirmation obtained that the individual is not on the Barred List
 - all other checks must be completed satisfactorily
 - the annual disqualification declaration **must** be completed (if applicable)
 - a Risk Assessment **must** be completed using the SCR, must be approved by both signatories and reviewed every two weeks
 - steps must be taken to ensure mitigating arrangements, which will include appropriate supervision and restrictions on certain types of activity (such as school trips), are put in place pending completion of the vetting checks and documented on the [Risk Assessment SCR within the notes](#) which must be reviewed by the Head every two weeks, and updated notes on the Risk Assessment made as an audit trail
 - details of supervisory measures and restrictions on work **must** be discussed and agreed with the new employee prior to them starting.
 - An audit trail will be available via the notes made in Risk Assessment evidencing the timeline followed
- 1.6 If any of the information contained in the pre-employment checks is unsatisfactory or has discrepancies, this should be followed up by the Hiring Manager, and Head, supported by SCR Champion. Any disclosure information relating to a conviction should be notified to the relevant signatories as per the Risk Assessment Flow for careful consideration and review of suitability to the post.
- 1.7 A decision not to appoint someone due to their conviction(s) should be clearly documented, so if challenged, the decision can be defended, in line with the appropriate policies. Serious, deliberate fraud or deception in connection with an application for employment may amount to a criminal offence. In such cases the employer should, in addition to any planned disciplinary

action, consider reporting the matter to the relevant authorities and/or regulators. The Regional CEO will be notified of any reporting to relevant authorities and/or regulators.

- 1.8 To assist you keeping track of this process, please use the [New Starter & Probation Checklist](#) within the SCR Toolkits for Employees and Non Employees as relevant.

2. References

- 2.1 Previously detailed in Appendix 1.

3. Verifying Identity

- 3.1 Previously detailed in Appendix 1.

4. Right to Work

- 4.1 When appointing new staff, the person's right to work in the UK must be verified. Please refer to the [Right to Work Guidance](#).
- 4.2 Further advice can be sought on <https://www.gov.uk/check-job-applicant-right-to-work>. All copies of documents should be verified (date and signature) and retained on the employee file.

5. Enhanced Disclosure and Barring (DBS) check including the Barred List and Social Media Check

- 5.1 UK DfE regulations for schools set out a statutory duty to obtain an Enhanced DBS. This must include Barred List information for newly appointed staff in regulated activity i.e. all permanent, fixed-term contracts and temporary staff (including bank supply staff) employed by the school/Cognita before they commence employment.
- 5.2 All roles with Cognita are defined as "Regulated Activity", the full legal definition of regulated activity is set out in Schedule 4 of the Safeguarding Vulnerable Groups Act 2006 as amended by the Protection of Freedoms Act 2012:

- a) teaching, training, instructing, caring for or supervising children if the person is unsupervised or providing advice or guidance on wellbeing, or driving a vehicle only for children, or engaged in overnight activity, even if this happens only once.
- b) work for a limited range of establishments (known as "specified places" which includes schools and colleges) with the opportunity for contact with children, but not including work done by supervised volunteers.

Work under (a) or (b) is regulated activity only if done regularly. Some activities are always regulated activities, regardless of their frequency or whether they are supervised or not. This includes:

- c) relevant personal care, or health care provided by or provided under the supervision of a health care professional:
 - o personal care includes helping a child, for reasons of age, illness or disability, with eating or drinking or in connection with toileting, washing, bathing or dressing.
 - o health care means care for children provided by, or under the direction or supervision of, a regulated health care professional.

- 5.3 Regularly is once a week, on four or more days in a 30-day period or overnight. As a general rule, it is likely that all school personnel will be carrying out regulated activity, and so will require a Barred List check with their enhanced DBS check. However, in order to assess whether a

particular role involves regulated activity, please consult the Keeping Children Safe in Education guidance or refer to the SCR Queries Team, by completing the form online: <https://forms.office.com/e/A9U5GesD82>.

- 5.4 The relevant DBS check must be carried out as a matter of priority for all new employees at the job offer stage via the online system. If the offer is made more than three months before the employment will commence, it is best practice to wait until three months before the commencement date before applying for the DBS check.
- 5.5 In addition, where an applicant is found to be on the Barred List, or the DBS Disclosure shows s/he has been disqualified from working with children by a court; or an applicant has provided false information in, or in support of, his or her application; or there are serious concerns about an applicant's suitability to work with children, the details must be escalated to the signatories on the Risk Assessment Flow, to review and agree the communication to the applicant. The facts must also be reported to the Police, the DBS and:
 - If the individual is a teacher in England, the DfE Children's Safeguarding Operations Unit (formerly the Teachers Misconduct Team) must be informed
 - If they are a teacher in Wales, the General Teaching Council of Wales must be informed.
- 5.6 All steps taken in following up such issues must be clearly documented and retained on the recruitment file.
- 5.7 The school is able to undertake a free, online status check as an alternative to making a full new DBS check if the applicant has subscribed to the "Update Service" and gives written permission to the school to do so. By using this service, the school is able to check if any new information has come to light since the DBS certificate was originally issued. However, if the check does declare that something has changed the school will need to seek a new disclosure in order to use that information as evidence for a discussion with the applicant.
- 5.8 To carry out a status check of a DBS certificate, the school must:
 - have the applicant's consent
 - confirm that they are legally entitled to carry out the status check
 - see the original paper certificate to check it is the same type and level as they are legally entitled to apply for
 - make sure that the right checks have been carried out and see what, if any, information was disclosed about the applicant
 - check the person's identity
 - check the name on the DBS certificate matches this identity
 - note the DBS certificate reference number, the person's name and date of birth
- 5.9 If the successful applicant has not subscribed to the "Update Service" they should be instructed to log into the Capita online portal to commence their DBS check via; <https://disclosure.capitarvs.co.uk/cheqs>
- 5.10 If the applicant did not provide appropriate identity documents on the interview day to meet the identity checking requirements for the DBS, then they will be required to bring their original (not copy) ID for checking to a school/Cognita verifier as part of the recruitment process. Copies of documents should be verified (date and signature), retained on the employee file and recorded on the SCR.
- 5.11 If the position being offered also requires a Prohibition from Management check it is important to advise the successful applicant of the need to include the words "Management of Independent School" immediately after their job title within their application.
- 5.12 An Applicants' Guide can also be downloaded for further information on applications for DBS via; [Candidates | Matrix Security Watchdog](#)

- 5.13 Schools are required to update DBS checks (including Barred List checks if applicable to the role) for all staff, as from time to time determined by the Proprietor, or as soon as possible if concerns arise about an existing staff member's suitability to work with children.
- Heads are responsible for ensuring schools DBS checks are updated when appropriate, and the HR Operations Team will assume this responsibility for the regional office.
 - Additionally, staff are required to sign an annual self-declaration regarding their suitability to work with children.
- 5.14 Within our Welsh schools there is a requirement to undertake a new DBS should an employee be promoted to a position with significant greater responsibility for children and young people.
- 5.15 Please note that it is only permissible to keep a photocopy of a DBS and/or criminal/Police records for up to **six months and for reasons of a formal recruitment query**. A record of the check and confirmation that it was satisfactory will be recorded on the **SCR**, together with details of the certificate number.

6. Overseas Checks

- 6.1 Staff that have lived and/or worked outside of the UK must undergo the same background checks as all other applicants (which includes obtaining (via the applicant) an enhanced DBS certificate (including barred list information, for those who will be engaging in regulated activity, even if the individual has never been to the UK), plus additional criminal/Police record checks (overseas checks) to account for their time spent overseas and any other further checks the school thinks appropriate so that any relevant events that occurred outside the UK can be considered.
- 6.2 Such further checks could include 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 or that they are aware of any reason why they may not be suitable to teach.
- 6.3 The school 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. The same approach should be taken in respect of foreign nationals and UK nationals returning from overseas. Whilst sanctions and restrictions imposed by another regulating authority do not prevent a person from taking up a teaching position in the UK, if such information is sought, the school should consider the circumstances that led to the restriction or sanction being imposed when considering the applicant's suitability for employment. Copies of documents should be verified (date and signature), retained on the employee file and recorded on the **SCR**.
- 6.4 Criminal/Police record checks must be sought for:
- all other countries in which the applicant has lived and/or worked for a period of three months or more in the past ten years. Please note that checks are not required prior to the age of 16.
 - country where applicant completed teacher training (or relevant teaching qualifications) (if not within the UK).
- 6.5 If an overseas check is not in English, a reputable translation company should be used to translate the document. To ensure data protection, no member of the school staff or department must be asked to assist with translation, unless they are a member of the Interview Panel.
- 6.6 It is the responsibility of the candidate to provide an overseas check in English, in exceptional circumstances, translation can be arranged and will be charged to the school budget. Please contact the SCR Queries Team by completing the form online to arrange this, confirming budgetary approval - <https://forms.office.com/e/A9U5GesD82>.
- 6.7 The school should be mindful that not all countries provide criminal record information and even where they do, the nature and detail of that information will vary from country to country. Further,

the school should be mindful that the criteria for disclosing offences in other countries often will have a different threshold from those in the UK. The Home Office can provide further guidance on criminal record checks for overseas applicants via <https://www.gov.uk/government/publications/criminal-records-checks-for-overseas-applicants>.

- 6.8 In the event that criminal/Police record checks are not available or forthcoming from a country, alternative documents to evidence their time spent in the country must be sought, such as certificates of good conduct (where available) or, if they worked in the country, full employment references. If no employment references are available, character references from professionals that knew the individual in the country can be sought. In this situation, the school should undertake a risk assessment that supports informed decision making on whether to proceed with the appointment. This should be recorded on the SCR by raising a Risk Assessment and signed by the signatories on the Risk Assessment flow; this should be reviewed every two weeks and closed as relevant or as a permanent Risk Assessment as deemed necessary.
- 6.9 Any disclosures on overseas checks will need to be discussed with the Head, School SCR champion and relevant signatories on the Risk Assessment flow to allow an informed recruitment decision to be made.
- 6.10 UK Military Personnel:
- If an applicant has spent time overseas serving in the British Forces, criminal/Police record checks should still be requested for all countries where the individual has spent three months or more in the past ten years, as offences committed away from the base are not always recorded by the forces and documented in a DBS check.

7. Letter of Professional Standing

- 7.1 Anyone who is appointed to carry out teaching within England on or after 01 January 2021 who has previously taught overseas, must provide a letter of professional standing from the professional regulating authority in all other countries where they have taught. This includes Teaching Assistants, Nursery practitioners and Managers, Sports Coaches and Peripatetic Teachers. Copies of documents should be verified (date and signature) and retained on the employee file.
- 7.2 Where this information is not available, an alternative method of checking this should be sought, such as a reference from the teaching establishment overseas. A Risk Assessment will need to be raised via SCR online and signed off by the relevant signatories on the Risk Assessment Flow to support the informed decision on whether to proceed with the appointment.
- 7.3 Some overseas qualified teachers can apply to the TRA for the award of qualified teacher status (QTS) in England. The school should be mindful that holding a teaching qualification is not an assurance that an individual has not been found guilty of any wrongdoing or misconduct, and/or is suitable to work with children.

8. Prohibition from Teaching Check

- 8.1 Anyone who is appointed to carry out teaching within England requires an additional check to ensure they are not prohibited from teaching. It is irrelevant whether the person carrying out teaching work has QTS or a Teacher Reference Number (TRN).
- 8.2 This check needs to be completed for teaching assistants, learning support assistants, nursery practitioners and managers, sports coaches and peripatetic teachers who are involved in:
- Planning and preparing lessons and courses for pupils
 - Delivering and preparing lessons to pupils
 - Assessing the development, progress and attainment of pupils
 - Reporting on the development, progress and attainment of pupils

8.3 Each School must register at least two representatives for Teacher Services provided by the Teaching Regulation Agency (formerly NCTL) by sending an email to: Employer.ACCESS@education.gsi.gov.uk with the following information:

- Name of the School
- DfE number
- Name and email address of the nominated person/s

Heads must ensure additional registrations take place in a timely manner should representatives leave.

8.4 The Teacher Services portal should be used to check successful applicants for any prohibitions by either entering their TRN number for an automatic search or alternatively manually checking all relevant lists for all known names:

- Prohibition lists are listed alphabetically by surname and can be found by clicking on the reference number adjacent to the name, this will then take you to more information about the sanctions that have been imposed.

8.5 The person who is responsible for conducting the check must print off evidence that the check has been completed, sign and date the evidence and file it in the employee file, ensuring that they are not capturing data of any other individual thereby contravening data protection legislation:

- for teachers with a TRN number = The report can be printed, signed and dated.
- for teacher without QTS evidence = Printed screen shot showing the TRA website page where you would enter the TRN, which is signed & dated with the statement: 'I have checked all relevant prohibition from teaching lists and certify this person is not on any of them'.

8.6 Please note that although this check is not applicable for teachers who gained their qualification in Wales there is a requirement for schools in Wales to undertake a registration check, see section on Education Workforce Council Registration.

8.7 For those teachers who have either trained or been working in Wales, Scotland, Northern Ireland or the Republic of Ireland it is possible to write and request for confirmation of whether any prohibitions are in place. To do this you should send an email to the relevant teaching council including details of all known names, date of birth, NI Number and where possible the TRN.

Scotland - The General Teaching Council for Scotland:
Tel: 0131 314 6080
Email address: gtcs@gtcs.org.uk
Website: www.gtcs.org.uk

Northern Ireland - The General Teaching Council for Northern Ireland
Tel: 028 9033 3390
Email Address: registration@gtcni.org.uk
Website: www.gtcni.org.uk

Republic of Ireland - Irish Teaching Council
Tel: 00353 1 651 7900
Email Address: info@teachingcouncil.ie
Website: www.teachingcouncil.ie

Wales - Education Workforce Council
Email address: egistration@ewc.wales
Website: <https://www.ewc.wales>

9. Prohibition from Management Check

- 9.1 The following staff have management responsibility:
- a Headteacher or Head of School, a member of the SLT (including non-teaching staff)
 - a proprietor or any person representing the proprietor in a governance role
 - teaching departmental headships who were recruited on or after 12th August 2015 must be checked to ensure that they are not subject to a direction under section 128 of the Education and Skills Act 2008 prohibiting that individual from taking part in the management of independent educational institutions in England and/or Wales respectively.

This is not an exhaustive list and it is important to note that an individual's job title is not the determining factor and whether other individuals could be considered to be 'taking part in management' depends on the facts of the case. All staff who are promoted internally to any of the aforementioned positions with management responsibility from 01 September 2018 must be checked regardless of their start date.

- 9.2 For all those appointed to a teaching position with management responsibility the prohibition check should be done using both routes, via the DBS with Barred List check and also by checking the appropriate list through the Teacher Services portal in the same way as the Prohibition from Teaching check (see sections 8 above)
- 9.3 For those individuals in regulated activity, but who are not teaching, this check should be undertaken by requesting it with the DBS and Barred List check (see section 5 above).
- 9.4 For individuals who are subscribed to DBS Update Service, this check will need to be completed using the Teacher Services Portal for "Section 128" barring checks. A printed screen shot confirming the check has been completed, showing the date and time within the print screen
- 9.5 For individuals who are promoted to a role requiring Prohibition from Management Check, this should be completed in the same way as for those on the Update Service. Such a check can be made of any individual with management responsibility, irrespective of whether or not that individual is a teacher. For individuals who are based in or qualified in Wales a check should be made through the Teaching Regulation Agency and the Education Workforce Council (EWC) in accordance.

10. Education Workforce Council (EWC) Registration

- 10.1 For positions in Wales, an additional check for current registration with Education Workforce Council must be completed for:
- All teachers including supply, Peris, Tutors, Coaches
 - All Learning Support Assistants and Teaching Assistants
 - Nursery Practitioners, Managers
 - Headteachers, Heads of School
- 10.2 Registration should be checked for those involved in:
- Planning and preparing lessons and courses for pupils
 - Delivering and preparing lessons to pupils
 - Assessing the development, progress and attainment of pupils
 - Reporting on the development, progress and attainment of pupils
- 10.3 A non-exhaustive guide of positions that would need to be registered with EWC:

Yes – Registered	No – Not Applicable
Headteachers	Caretakers

Head of School Teachers – including supply, agency Teaching Assistant Classroom Assistant Learning Support Assistant / HLTA Special / Additional needs Assistant Pastoral / Welfare Assistant Bilingual Support Assistant Support Assistant Instructor Cover Supervisor Foundation Stage Assistant Technician Learning Coaches Private sports and music contractors GTP / Teach First (first year) Overseas Trained Teacher	Career Advisor Educational Psychologist School Nurse Administrative Staff Catering Staff Attendance and Inclusion Officer Lunchtime Supervisors Breakfast Club Supervisors Finance Controller Operations Manager Data Manager Trainee Teachers Voluntary helpers e.g. reading, after school clubs
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11. Medical Fitness Check

- 11.1 At offer stage, a [Health Declaration Form](#) is required from each member of staff, duly signed, that they know of no reasons, on the grounds of mental or physical health why they should not be able to discharge their duties with respect to the Role Profile and contract of employment.
- 11.2 Copies of [Health Declaration Forms](#) should be verified (date and signature), filed in a separate file (not on the employee file) and recorded on the [SCR](#).
- 11.3 In case of a declaration, the Hiring Manager and/or both signatories on the Risk Assessment Flow, must be informed, and a follow up completed including any formal Health & Safety Risk Assessments and/or adjustments required.

12. Disqualification

- 12.1 At offer stage, (and annually at the start of Autumn term thereafter), the Head and school are responsible for ensuring an Annual Disqualification Declaration Form is obtained from each member of staff who provide childcare for children up to the age of five during school hours and up to the age of eight in wrap around care and those directly involved in managing the early years provision, confirming that they are not disqualified under the Childcare (Disqualification) Regulations 2018.
- 12.2 The declaration must be signed and retained on the employee file. This may be recorded on the [SCR](#).

Appendix 3: Recording & Monitoring New Starters

1. New Starter Probation Checklist

- 1.1 The [New Starter Probation Checklist](#) must be completed as an evidence tool that all necessary checks and returns have been received. This document is signed off by the Head and filed in the employee file.
- 1.2 All pre-employment checks should be completed prior to commencement and non-negotiable where indicated.
- 1.3 If any of the checks required are not fully compliant with the standard process this must be documented on a [Risk Assessment on the SCR, Risk Assessment section](#), whereby a discussion with the employee is recorded, the considerations noted, details of any mitigating actions are clearly defined and the outcome determined by the Head to enable a full audit trail.

2. Recording on SCR

- 2.1 Reference should be made to who should be included on SCR, Section 12 of the main policy.
- 2.2 All fields on SCR must be completed prior to commencement, with reference to Risk Assessment where all checks have not been completed.
- 2.3 If operating from a multi-site school and sharing staff all information listed above should be recorded on both schools' [SCRs on SCR](#).
- 2.4 Only one location, single registered school or School Support Centre should be responsible for; holding the full employee file of a staff member, obtaining the necessary documents and for undertaking any appropriate checks.
- 2.5 The primary location is responsible for providing written confirmation of the checks to the other sites, together with any applicable risk assessments for multiple locations.
- 2.6 The Head at the second site is then responsible for reviewing the data and for documenting any site-specific risk assessments on the basis of the information provided and their acceptance that all the necessary checks for the post within their school have been completed to their standard.
- 2.7 Where necessary they should also undertake additional checks applicable to the arrangements at their school if the original risk assessment does not provide an appropriate mitigation for that site. If any additional check is required, the second school will complete the check and ask for the primary school to retain the information on file.
- 2.8 Best practice recommends completion of SCR should be completed by personnel different to those that completed the check to demonstrate robust governance processes. Where the checker adds the information to the SCR, the New Starter & Probation checklist must be signed by the Head. There should be a nominated person responsible for adding confirmation of checks to SCR, with a back-up person in case required.
- 2.9 The school must be able to print out the SCR using the available reports on SCR.
- 2.10 All fields must be completed on [SCR in SCR Tracker](#):
 - Confirm the check is required by switching the appropriate tab to green
 - the dates as per the table below
 - the checker's initials
 - if there is no requirement to see documentation (e.g an overseas check is not required) the appropriate tab should be switched to grey as no field should be left incomplete.

2.11 Table below indicates information that should be included on SCR as per ISI:

SCR Field	All Employees Non Employees	3 rd Party Contractors Agency & Supply
All checks	Date check was completed and verified as acceptable	Date of receipt of confirmation check was completed by 3 rd Party or Agency
Update Service for DBS	Date Enhanced Certificate was seen (Update Service check to be recorded in Additional Notes)	
Additional Notes	<ul style="list-style-type: none"> • DBS Update Check, if on Update Service • DBS checks re-done, new date • EWC Registration & Expiry 	<ul style="list-style-type: none"> • Any changes in circumstances or additional checks • Change in Employee Type or Additional Role
Additional Notes – Changes in Role/Location/Employee Type	<ul style="list-style-type: none"> • Additional checks completed • Confirmation of checks transferred • 3rd Party or Agency moving to employee contract or additional role, start date with Cognita (original hire date would be start date of the contract) 	

2.12 All documents should be copied, dated, signed with a print name to state they are a "copy of the original" so that there is no doubt on record.

2.13 The school may also record other information deemed relevant, for example, whether staff have been informed of their duty to disclose relevant information under the childcare disqualification arrangements, dates of which safeguarding and safer recruitment training was undertaken and the name of the person who carried out each check.

3. Staff Annual Declaration

3.1 On an annual basis all staff will be required to complete the [Staff Annual Declaration](#) which ensures their knowledge and understanding of safeguarding related policy, procedure, key contacts in the school and (for all relevant staff) provides for a personal safeguarding declaration with regard to DBS.

3.2 Where an aspect of the annual declaration is not applicable to the role undertaken by the individual, then they should enter "N/A" against the relevant entry on the Declaration before signing and returning it.

4. Change of Employment

4.1 Where an employee's role changes, the Hiring Manager must give due consideration to the relevant checks now appropriate for the new role (i.e. has the existing member moved to a position involving regulated activity?).

4.2 If a member of staff moves from a position involving regulated activity into non-regulated activity only, ongoing relevant checks should be monitored and recorded.

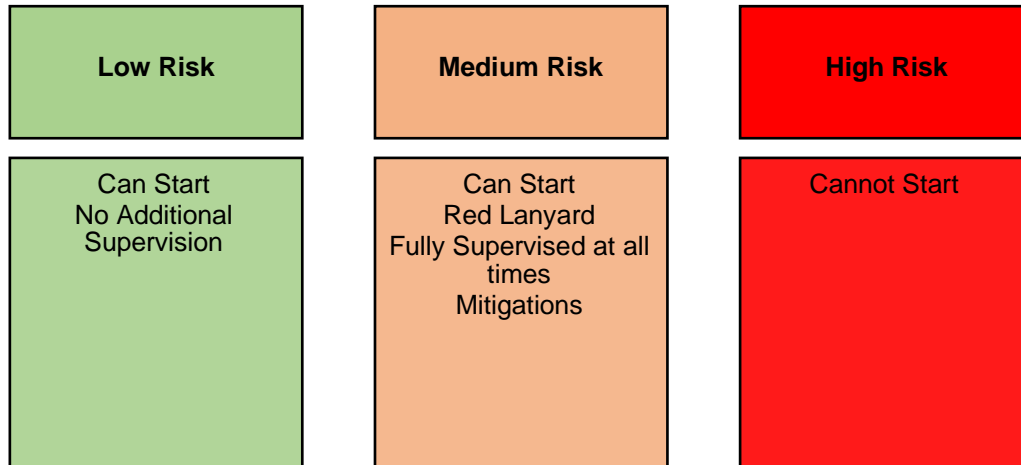
4.3 In both cases the [SCR](#) should be updated accordingly.

4.4 All paperwork and checks associated with a change of employment must be filed in the employee file and a note of the change recorded on the SCR. Further guidance on changes of employment and related checks is available on SCR Guidance Document.

Appendix 4: Risk Assessment Guidance

1. Risk Assessment Overview

- 1.1 Risk Assessment can only be raised, for some of the checks and only in exceptional circumstances.
- 1.2 All other pre-employment checks must have been completed.
- 1.3 Where a check is not completed, prior to raising Risk Assessments instead of postponing start date, the following should be considered:
 - Is the Appointment necessary to allow service provision to continue
 - The candidate will have no unsupervised contact with children
 - The candidate will have no access to sensitive records
- 1.4 Decisions should be based on whether this is considered, High, Medium or Low.
- 1.5 Risk Assessments should be signed prior to commencement by both signatories as per Risk Assessment Flow, with fortnightly reviews undertaken to close off Risk Assessment as soon as possible.
- 1.6 Where supervision is required, a list of all dates, signed by supervisor will be retained on employee file to demonstrate robust processes.
- 1.7 List of mitigations put in place depending upon level of risk in relation to the specific responsibilities of the role, needs to be included in the Risk Assessment Notes on SCR.



2. DBS

- 2.1 Where a DBS check is not completed, a Cognita application must have been made and a separate Barred Check completed.
- 2.2 Does the candidate have a previous Enhanced DBS, and if so what is the issue date?
- 2.3 Is the issue date on previous Enhanced DBS less than 3 months, and from an Education Setting? If yes, a check is not legally required as per KCSIE, although Cognita will instigate a new one, therefore given sufficient information, this can be categorised as low risk

DBS		
Low Risk	Medium Risk	High Risk
Start no supervision	Start on Red Lanyard fully supervised	Cannot Start
<p>They have a previous Enhanced DBS certificate</p> <p>The gap is less than 3 months between working at a previous employer in an Education Setting and commencement date</p>	<p>There is a gap of more than 3 months between working at a previous employer in an Education Setting and commencement date</p> <p>or candidate will have no unsupervised contact with children or access to sensitive records</p> <p>There is sufficient information on other pre-employment checks</p>	<p>There is a gap of more than 3 months between working at a previous employer in an Education Setting and commencement date</p> <p>There is no previous Enhanced DBS certificate</p> <p>There is insufficient information in the other pre-employment checks</p>

- 2.4 Any Risk Assessments for DBS, need to be reviewed every 2 weeks on the DBS portal to check what stage the application is at. The earliest we are able to escalate the check, is when it is at Stage 4 for 60 days or more. Please note we are unable to escalate the delay in receiving the check. Risk Assessments must be closed permanently once the certificate has been viewed.
- 2.5 Where a certificate is not received after 2 weeks of the issue date, the candidate will need to request for a duplicate to be issued, a duplicate will only be issued if this is within 93 days of issue date.
- 2.6 Registration on Update Service can only be done within 30 days of receipt of certificate.

3. Overseas Check

- 3.1 Where an overseas check is required, but not completed, evidence must be provided demonstrating that the check has been applied for and is being processed.
- 3.2 Where the candidate has stated, it is impossible to obtain the check, Cognita must check this against Guidance on the application process for criminal records checks overseas ([Criminal records checks for overseas applicants - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/guidance/criminal-records-checks-for-overseas-applicants)) to verify this and retain a copy in the file as evidence.
- 3.3 Risk Assessments for outstanding overseas checks, must be reviewed and followed up with the candidate every two weeks.
- 3.4 If the candidate provides evidence, where they have submitted the request, and been rejected, this needs to be confirmed by Cognita before permanently closing the Risk Assessment and confirming as check completed on SCRT else it will show as non-compliant.

Overseas Check

Low Risk	Medium Risk	High Risk
Start no supervision	Start on Red Lanyard fully supervised	Cannot Start
Cognita has verified with Guidance via Gov.uk that the check is not being issued by the relevant country And Employment Reference from overseas employer has been received	Evidence that an application has been made and is being processed All other pre-employment checks have been completed	Possible to obtain overseas check No Evidence to prove the application has been submitted and is under process

4. Letter of Professional Standing

- 4.1 Where a Letter of Professional Standing is required and not completed, Is there sufficient evidence to demonstrate that every effort has been made to obtain the check or alternates in place of the check?

Letter of Professional Standing		
Low Risk	Medium Risk	High Risk
Start no supervision	Start on Red Lanyard fully supervised	Cannot Start
Cognita has verified with relevant authorities that the check is unobtainable and reference from overseas employer has been obtained The duration and nature of teaching time spent overseas is less than 12 months and more than 5 years ago All other checks are complete	Evidence that the check is under process and alternates are being sought All other pre-employment checks have been completed	No Evidence to demonstrate checks were being made

5. Disclosure

- 5.1 In the case of a Disclosure, before reaching a decision on whether to confirm employment, the following should be considered:
- Did the applicant disclose this on the Self Declaration form, and if so, was this discussed at the interview
 - Is the applicant barred from appointment and is the declaration relevant to the role
 - Does the nature of the role allow the applicant to potentially re-offend
 - Circumstances surrounding the declaration, seriousness, length of time since it occurred, is there a pattern to the behaviour or was this a one-off
 - Have the personal circumstances changed

5.2 Assessing the Risks on Disclosures or Declarations:

- Did the applicant declare this on DBS Application
 - Do they agree with the information on the DBS certificate
 - Were any offenses work related or committed within the context of a work setting
 - Were any offenses committed within the last 2 years
 - What is their attitude to the offenses now
 - Would they do anything differently now
 - Have the circumstances changed since the conviction
 - Are there any mitigating circumstances
 - Can they demonstrate any efforts not to re-offend
 - Can safeguards be implemented to reduce or remove the risk
 - What supervision is available

5.3 Decisions should be based on whether this is considered, High, Medium or Low after reviewing the above considerations:

- Can protective measures be put in place to render the risk low?
- An outline of protective measures, e.g. Risk Management Plan such as limited access to sensitive information, additional supervision, change of work location, temporary diversion of low risk tasks or training

Appendix 5: Unsuccessful Candidates, External and Internal

1. External Candidates

- 1.1 The Hiring Manager should collate interview notes for all candidates and forward to those responsible for the recruitment process. The Central HR Team will be responsible for these for Head Office based roles.
- 1.2 The Application pack including the following, should be retained for six months, as they will provide justification on the event of a potential complaint about the selection process:
 - Application Form
 - Self Declaration Form
 - References
 - Qualifications, ID Documents
 - Interview Notes
 - Additional Notes made relating to Basic Internet and/or Social Media checks or any other clarifications and notes
- 1.3 All hard copies of the above should be shredded; all electronic copies should be deleted.

2. Internal Candidates

- 2.1 The Hiring Manager should collate interview notes for all candidates and forward to those responsible for the recruitment process. The Central HR Team will be responsible for these for Head Office based roles.
- 2.2 The Application pack including the following, should be retained on the employee file, as they will provide justification on the event of a potential complaint about the selection process:
 - Application Form
 - Self Declaration Form
 - References
 - Qualifications, ID Documents
 - Interview Notes
 - Additional Notes made relating to Basic Internet and/or Social Media checks or any other clarifications and notes
- 2.3 The employee file would be subject to the Data Retention Policy.