



# Safer Recruitment & Selection Policy

Policy Folder: Human Resources

## SAFER RECRUITMENT & SELECTION POLICY

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### 1.0 INTRODUCTION

**1.1** Definition – ‘Divisional recruitment lead’ refers to the person who administers and manages the recruitment process, on behalf of the Hiring Manager and the accountable individual, for the vacancy being recruited.

**1.2** ‘Accountable individual’ changes with divisions:

- Children’s Education - Headteachers/Principals
- Adult’s Education - Headteachers/Principals
- Central - Head of Department

**1.3** Definition – Wherever “Blenheim” is mentioned, this refers to Outcomes First Group.

**1.4** Definition- Hiring Manager is the line manager who is recruiting a vacancy that reports directly into them.

**1.5** The safer recruitment and selection of Group employees, workers and contractors is central to achieving the highest quality of service, care and education.

**1.6** This policy covers all companies, divisions and subsidiaries in Outcomes First Group including but not limited to, Acorn Education, Options Autism, Momenta Connect, Blenheim and central functions.

**1.7** Blenheim is committed to safeguarding and promoting the welfare of children and vulnerable adults and expects all employees, workers and contractors to share this commitment. Blenheim recognises the vulnerability of the children and vulnerable people in its care, and in the care of those who we train and support and is committed to operating to the highest standards when recruiting. Blenheim is wholly committed to recruitment and selection procedures that help to deter, reject or identify people who might abuse or cause harm to children or vulnerable adults, or are otherwise unsuited to work with them.

**1.8** Blenheim operates a non-discriminatory, fair and objective recruitment and selection process. In line with the Equal Opportunities Policy, all applicants will receive equal treatment and access to opportunities, irrespective of sex, age, marital status, sexual orientation, race, ethnic origin, religion or belief, disability, membership or non-membership of a Trade Union.

**1.9** It is the responsibility of the hiring manager to consider any conflicts of interest and safeguarding risks as a result of existing personal relationships between anyone currently within the team and candidates applying to vacancies. Relationship risk assessment must receive final sign off from Operations Director and must be taken by the hiring manager to ensure an objective and transparent recruitment process is conducted. The hiring manager should seek advice from HR if there is any concern about a conflict of interest, safeguarding risks and/or a lack of transparency in the recruitment process.

**2.0      SCOPE**

This policy applies to the recruitment of everyone who works for Blenheim as an employee or a worker, whether they are employed, self-employed, or a contractor. This includes, but is not limited to, bank workers, panel members, and sessional support workers. The policy also applies to the recruitment of agency workers, volunteers and contractors, working on our sites and employed by a third party.

### **3.0 SAFER RECRUITMENT**

**3.1** Blenheim is dedicated to safeguarding children, young people and vulnerable adults and therefore safer recruitment processes are at the heart of this policy in order to identify, deter and reject unsuitable candidates. It is the responsibility of every recruiting employee to conduct themselves in a manner that champions the spirit of the Bichard Enquiry Report 2004: '*For those agencies whose job it is to protect children and vulnerable people, the harsh reality is that if a sufficiently devious person is determined to seek out opportunities to work their evil, no one can guarantee that they will be stopped. Our task is to make it as difficult as possible for them to succeed...*' [p.12, para 79 - <http://dera.ioe.ac.uk/6394/1/report.pdf>]

**3.2** This procedure and related guidelines have been produced with reference to the DfE publication 'Keeping Children Safe in Education' ([KCSIE 2025](#)) related obligations under the Childcare Act 2006: National Minimum Standards, the Guide to Children's Homes Regulations, Independent School Standards, Residential Special Schools National Minimum Standards 2015, the Scottish Social Services Council (SSSC) 'Safer Recruitment Through Better Recruitment' report (November 2016); Keeping Learners Safe: the role of local authorities, governing bodies and proprietors of independent schools under the Education Act 2002 (Welsh Government 2021) and current employment legislation. Where possible, taking into account the above, this procedure complies with the Equality Act 2010. This is not an exhaustive list and Blenheim Head of Safeguarding ensures that the current practice is in line with any regulatory changes.

**3.3** Outcomes First Group fully supports children to be in education or training until their 18<sup>th</sup> Birthday. Therefore, children under 18 should not be employed in any setting unless they are undertaking an agreed apprenticeship. When working under an [apprenticeship programme](#) in keeping with the DFE guidelines, we will support the young person to engage in the content and ensure their health and safety by adhering to [The Working Time Regulations](#) 1998 with regular rest breaks and day working only.

**3.4** The level 3 Diploma in Childcare does not count as training as a trainee must be aged 18 to undertake this programme.

### **4.0 APPROVAL TO RECRUIT**

- 4.1** All vacancies must be submitted for approval through the designated applicant tracking system, using the correct approval chain and vacancy request form.
- 4.2** No recruitment activity should take place prior to vacancy approval.

## **5.0 THE RECRUITMENT PROCESS**

- 5.1** The hiring manager will consider carefully the skills, knowledge and experience the successful candidate will need to demonstrate, and whether there are any particular elements that need to be included in the job description and job advertisement for the post in order to attract suitable candidates. The information for candidates will clearly state the extent of the relationships/contact with children and vulnerable adults, and the degree of responsibility for children and vulnerable people that the appointed person will have. Please see appendix 5 for the inclusive and equitable job description guidance. Outcomes First Group is committed to carrying out a fair, thorough and efficient recruitment process in line with Keeping Children Safe in Education. Whilst we aim to keep applicants informed throughout, Outcomes First Group does not accept liability for any loss of earnings or other associated costs incurred by applicants as a result of delays or changes in the compliance process. All stages of the compliance process are subject to necessary safeguarding checks and compliance with statutory requirements, which may affect timescales.
- 5.2** The Job Description will be revised where appropriate in consultation with HR to include the required skills, knowledge and experience, as well as the essential and desirable criteria. The Job Description will make reference to the responsibility for safeguarding and promoting the welfare of children/vulnerable adults.
- 5.3** Blenheim's safeguarding statement, as outlined below, must be added to the bottom of both the advert copy and the job description: '*Outcomes First Group/ Divisional Brand Name* is committed to safeguarding and promoting the welfare of the children and vulnerable adults in our care. Successful applicants will be subject to a Disclosure and Barring Service check. We expect all employees to understand our Group Safeguarding Policy and undertake training. We will undertake recruitment checks throughout the recruitment process where permission has been given by candidates.'
- 5.4** All jobs will be advertised internally for at least one full week using the internal jobs portal and employees will be notified via email on a weekly basis
- 5.5** When it is necessary to attract external applicants, jobs will be advertised externally, using the designated applicant tracking system on the relevant careers website and using appropriate external media channels when necessary, dependent on guidance and approval from central resourcing team or HR.

**5.6** Recruitment agencies will only be used with agreement from the Operations Director. Agencies may be considered if advertising has failed to source the quantity and quality of candidates required. Operations Director may agree to go direct to agency before advertising a vacancy if the type of role being recruited is known to be a hard to fill job. Only recruitment agencies agreed through the company Preferred Supplier List (PSL) document can be used, to obtain a copy of this, you must contact the Head of Resourcing. No waivers, disclaimers or risk assessments will be accepted for agency staff, and they must be fully compliant before commencement of their agreed position.

**5.7** Full employment history must be submitted by each applicant. Due to the different regulatory requirements in our divisions and sectors the way we gather the information varies slightly depending on role and the country this is based in. However, all applications are required to answer standardised questions and submit details of full employment history since mandatory leaving school age. The below table sets out how we gather this information upfront. If invited for interview candidates are also asked to complete a standard template to show their education and employment history and clarify the reasons for any gaps they have had in the history since mandatory school leaving age. It is the hiring managers' responsibility to review all information present and query the career history during the interview, detailing any reasons for gaps and reasons for leaving roles.

<b>Division</b>	<b>Country</b>	
Education	ALL	Submit an application form, employment history must be entered into the form manually by the candidate
Clinical	ALL	Submit an application form, employment history must be entered into the form manually by the candidate
Central	ALL	Submit an application form with a CV upload option for employment and education history

**5.8** Incomplete applications should not be accepted and should be returned for completion. Until completed these applications should not be considered for shortlisting. Applicants can be considered for interview (shortlisting) on a shortened application form and/or CV (if applicable), but full employment history since mandatory school leaving age needs to be submitted before attending the interview so that any anomalies, discrepancies or gaps in employment can be discussed at interview. If a candidate has submitted a CV when applying rather than an application form, an application must be sought alongside it to ensure adequate information is received in line with our policy (see 5.7), they must also complete an employment history form prior to interview, to be explored at interview. (Please also see appendix 6 for our Blind CV Policy)

- 5.9** Every candidate will be asked to complete a voluntary Equal Opportunities Form. This form includes personal demographic data and is collected for monitoring the objectivity of Group recruitment processes. This information is not visible to the hiring manager and other employees responsible for making recruitment decisions.
- 5.10** Reasonable adjustments will be made to accommodate any candidate who makes a request at any stage in the recruitment process.
- 5.11** Shortlisting for interview will be carried out using the Job Description and Application Form by the hiring manager. It is best practice to have at least two people carry out the shortlisting of applicants to ensure fairness and impartiality. Shortlisting can be conducted using a shortened application form as long as the same form is used for all applicants applying to a vacancy. The shortlisting decision should be recorded on the applicant tracking system. Candidates who have made a self-declaration of their criminal record or information that would make them unsuitable to work with children must be considered at shortlisting and interview stage and discussed in detail with the applicant.
- 5.12** KCSIE 2025 states that as part of the shortlisting process, schools and colleges should carry out an online search as part of their due diligence on their shortlisted candidates. This may help to identify any incidents or issues that have happened and are publicly available online which the hiring manager may want to explore with the applicant at interview. Hiring Managers and Vacancy Administrators must add a statement to all adverts to inform candidates that online searches are done as part of the due diligence for shortlisted candidates. These background checks are designed to ensure there are no quality of reputational concerns that might impact their ability to carry out their role or the reputation of Blenheim.
- 5.13** For all roles within Blenheim the hiring manager is responsible for carrying out internet searches on shortlisted candidates using a search engine e.g., Google, inputting the candidate's name and location. (Please see 12.0 and 13.0 Appendix 2 and 3 for guidance and further information on how to carry out an online search).
- 5.14** Candidates will be asked about any personal circumstances involving child protection, criminal convictions and referrals to regulatory bodies at both application and interview. **It is the responsibility of the Hiring Manager to review the application form for any answers to these questions and question further either at interview or after the interview.** If a Hiring Manager is unsure of how to question around the information provided they should speak to the central resourcing team before the interview to seek advice on how to handle the questioning. Any information needs to be flagged to Junior Business Partner or Senior HR Leadership and the accountable individual. A risk assessment must be completed and fully signed off before

the candidate is formally offered the role. During the pre-employment checking process (following offer) candidates will also be asked to volunteer information not already disclosed. If anything is disclosed the Hiring Manager should speak to the candidate to question further and then flag to HR and the accountable individual to complete a risk assessment and agree next steps, along with sign off from the Operations Director in consultation with Safeguarding and HR Please see 11.0 Appendix 1 for more information)

- 5.15** For education appointments, including but not limited to Teaching Assistants, Teachers and Senior Leadership Team, references should be sought on all shortlisted candidates before interview, so that any issues of concern they raise can be explored further with the referee and taken up with the candidate at interview. In exceptional circumstances we may be unable to approach a candidate's references prior to the interview if the candidate has withheld permission to do so using the applicant tracking system. All references must be sought and verified before the candidate begins employment.
- 5.16** All candidates must be interviewed in person at least once. The interview assesses the candidate's suitability to work with children and/or vulnerable adults. The interview panel should consist of at least two people, all interview panelists must have been trained in Safer Recruitment. The training must be managed locally on the Service Managed Mandatory Packs. The minimum standard of safer recruitment training is delivered through Blenheim's designated online module.
- 5.17** Safer recruitment training must be renewed every 2 years.
- 5.18** To ensure fairness and objectivity, all candidates will be assessed at interview against the required skills, attributes, behaviours and experience set out in the job description.
- 5.19** Interview questions should test a candidate's attitudes, motives and suitability for this role. At least one question in the interview must be relevant to safeguarding children and vulnerable adults. The central resourcing team will provide interview templates that hiring managers must ask as standard and the resourcing team can help with writing additional questions upon request.
- 5.20** Interview questions should be prepared in advance of the interview. Questions should be well structured, and the same questions applied for each candidate throughout the interviewing process. At least one set of complete interview notes must be uploaded to the relevant applicant tracking system. A record of the interviewer's assessment of the candidate's response will be recorded on the appropriate applicant tracking system.
- 5.21** All interviews must allow for the candidate to volunteer any personal information involving child protection, criminal convictions and referrals to regulatory bodies that has not previously been covered by the

application form or interview questions. All candidates must be made aware of this by the lead interviewer reading the following statement at the end of the interview to the candidates:

‘If you are successful, you will share the responsibility for safeguarding all young people and vulnerable adults in the UK. As part of this responsibility, you will be asked to volunteer information from your personal life that might pose a safeguarding risk, for example any relationships and associations. You will be asked to volunteer this information prior to starting.’

- 5.22** Where practicably possible, Blenheim expects a young person’s panel should form part of the assessment, for positions with regular contact with children and young people (for example and Teachers). Interview dates should be scheduled as early as possible in the recruitment process in order to include the young person’s panel. Care should be taken in order to avoid any potential conflicts between the candidate and young person’s panel.
- 5.23** Some roles will require additional testing and assessment. Hiring managers should consult HR for any guidance and assistance designing the assessment and selection process and stages.
- 5.24** The main interview panel must agree on scores and outcomes for all candidates interviewed. All candidates should be informed of the result of the interview and candidate feedback will be provided by a member of the interview panel upon request.
- 5.25** All candidates invited to interview will be asked to bring original documents to confirm the educational and professional qualifications required for the role as specified in the Job Description/Person Specification. The interview panel is responsible for collecting, inspecting and copying the originals at interview. Safer Recruitment requires that each copy obtained is signed to verify the original has been seen using the following format: ‘Original seen by [printed panel member name], [panel member signature], [Date].’ Copies cannot be obtained over email.
- 5.26** Candidates invited to interview will also be asked to bring original right to work documents. Right to work documents include UK passport, or UK Birth Certificate with proof of National Insurance, proof of EU settlement status, or a valid residence permit/Visa stating they are able to work in the UK. You need to check that what you are given is a valid document using this link:

<https://www.gov.uk/government/publications/right-to-work-checklist>.

The interview panel is responsible for collecting, inspecting and copying the originals at interview. Safer Recruitment requires that each copy obtained is signed to verify the original has been seen using the following format: ‘Original seem by [printed panel member name], [panel member signature], [Date]’/ Copies cannot be obtained over email.

**5.27** Candidates should also bring evidence of their original Enhanced DBS Certificate/ Disclosure Scotland check / Access NI (if they already hold one that is on update service) along with 3 proof of identification documents, plus any change of name documentation (if applicable) for their application. This must include at least one form of photo ID and at least one document with their current home address from the document guidance list here: <https://www.gov.uk/guidance/documents-the-applicant-must-provide>. If the candidate does not own any photo ID, they will be required to apply for and provide a Citizen's Card, which can be applied for [here](#). Where a candidate's name has changed, they are required to provide proof of the change (e.g. marriage certificate or deed poll certificate). The interview panel must copy, sign and verify the documents, ensuring the photo ID looks like the candidate using the following format "True likeness to candidate and original seen by [printed panel member name], [panel member signature], [Date]." (Copies cannot be obtained over email.)

**5.28** The hiring manager is able to make a verbal offer of employment to the successful candidate conditional on successful pre-employment checks if all necessary documents have been seen, including right to work and ID. The conditional offer can include a salary within the approved range and the contractual terms signed off at vacancy approval stage and templated to the role (including location, hours and benefits).

**5.29** One copy of the interview notes (deemed by the interview panel as the master copy) will be saved and sent to the divisional recruitment lead or uploaded to the applicant tracking system as well as verified copies of qualifications and identification documents to allow for references to be collected and pre-employment checks to be completed prior to commencing the formal offer process.

## **6.0 PRE-EMPLOYMENT CHECKS**

**6.1** All pre-employment checks are the responsibility of the divisional recruitment lead, and the accountable individual is accountable for ensuring each new employee has complete and satisfactory pre-employment checks for their division. This also includes temporary workers and contractors.

**6.2** All pre-employment checks listed below must be completed for all areas of the UK across all divisions. Any offer of appointment made to a successful candidate must be conditional on satisfactory completion of the necessary pre-employment checks; it is unacceptable for any candidate to start without all pre-employment checks completed (see following paragraphs for further detail and clarification):

- Full employment history from mandatory school leaving age and all gaps in employment accounted for (see 5.7 & 5.8)
- Verify the candidate's identity, including any change of name history (see 5.27).

- Verify the individual's right to work in the UK (see 5.27).
- Obtain (via the applicant) an enhanced DBS/Disclosure Scotland/Access NI certificate (including barred list information, for those who will be engaging in regulated activity. A barred list check checks whether applicants are barred from working with children or vulnerable adults) (see 5.25).
- We ask all employees to [register on the update service](#) as mandatory, this must be completed within 28 days of the DBS issue date. If an employee does not register, risk assessment must be put in place, with Operation Director sign off, and a new DBS application must be submitted within 12 months (see 6.5).
- Verify relevant professional qualifications and professional status where required (see 5.25, 6.19)
- The receipt of at least two satisfactory references, covering the last three years. One reference must be from the candidate's current or most recent employer (if they are not currently employed). All references must be completed by a senior individual with appropriate authority. If the referee is school or college based, the reference should be confirmed by the Headteacher/Principal and reviewed by HR as accurate in respect of any disciplinary investigations.
- You must compare the information on the application form with that in the reference and take up any discrepancies with the candidate, along with establishing the reason for the candidate leaving their current or most recent post, and ensure any concerns are resolved satisfactory before appointment is confirmed
- All references must be verified by phone to the referee on a landline phone number confirming the name of one person who it was verified with, name of verifier, date and time of verification. This check must always be recorded. (see 8.1)
- Additional reference from the British Armed Forces for those who have ever worked on a British Armed Forces Base (see 6.16)
- References obtained from any previous employer where the candidate was subject to disciplinary or a dismissal. If the reference is school or college based, the reference should be confirmed by the Headteacher/Principal as accurate in respect to any disciplinary investigations (8.10)
- A Medical Questionnaire fully completed by the candidate (6.23)
- For all roles within an education setting check for a teacher prohibition order (see 6.17 to 6.18)
- For all middle management and senior roles in education settings, and roles within the school governance hierarchy an additional check is required to ensure the individual is not prohibited under section 128 provisions (see 6.20)
- Childcare Disqualification is required for all staff working in early years' settings or in later years provision for children up to the age of 8. To support this, we ask all applicants to complete a declaration as part of their application form confirming whether they are disqualified or disqualified by association. (Please see 17.0 – Appendix 7)

- Internet background searches must be conducted by the hiring manager for all shortlisted candidates. These background checks are designed to ensure there are no quality or reputational concerns that might impact their ability to carry out the role or the reputation of Blenheim (see 5.12 – 5.14).
- For all roles within the Children's Education a satisfactory overseas check is needed for individuals who have lived or worked outside of the UK in the last 10 years. (see 6.13 to 6.15)
- For all clinical roles, and or those registered with a professional body a registration check is required (see 6.13)

**6.3** All new starter files need to be signed off by the accountable individual to confirm pre-employment checks are complete and satisfactory. (See 19.0 Appendix 9 for Guidance)

- Children's Education - Headteachers/Principals
- Adult's Education - Headteachers/Principals
- Central - Head of Department

**6.4** Blenheim will adhere to its mandatory responsibility to secure a certificate from DBS (England & Wales), Disclosure Scotland, or Access NI (Northern Ireland) for all new employees before their appointment. It is our policy that these checks will be renewed every three years. If a candidate is on the update service it is their own responsibility to ensure this is renewed annually. It is the responsibility of individual responsible for personnel files to check every three years that the employee holds a valid DBS. **It is the responsibility of the employee to alert their divisional recruitment lead or line manager if there should be any changes with the status of their DBS. The Accountable Individual is accountable for ensuring all DBS checks are valid.**

**6.5** We ask all employees to [register on the update service](#) as mandatory, this must be completed within 28 days of the DBS issue date and is the employee's responsibility. If an employee does not register, risk assessment must be put in place, and a new DBS application must be submitted within 12 months.

**6.6** The level of check required will depend on the employee's role and the duties they fulfil. At least a standard check certificate is required for every employee and agency worker/contractor. For those who are working based at one of our services, or if their role involves unsupervised access to any of our children or vulnerable adults, an enhanced check certificate will be required as a minimum.

**6.7** An enhanced check certificate, which includes barred list information, will be required for those engaging in regulated activity. The barred list check must be carried out using the correct category (children and/or adult) dependent on the role and level of contact with children and vulnerable adults. This covers the majority of Blenheim, as outlined in the following definition of regulated activity.

**6.8** Regulated activity with children includes:

- a) Teaching, training, instructing, caring for (see (c) below) or supervising children if the person is unsupervised, or providing advice or guidance on physical, emotional or educational well-being, or driving a vehicle only for children;
- b) Work for a limited range of establishments (known as 'specified places', which include 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 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:
  - personal care includes helping a child with eating and drinking for reasons of illness or disability or in connection with toileting, washing, bathing and dressing for reasons of age, illness or disability.
  - health care means care for children provided by, or under the direction or supervision of, a regulated health care professional.

(see 'KCSIE 2025' for more detail on regulated activity in schools in England)

**6.9** All employees based in England and Wales will be encouraged to register for the DBS update service. See <https://www.gov.uk/government/collections/dbs-update-service-promotional-material> for further information. The cost of this can be reclaimed from the company (Please see the expenses policy for more information)

**6.10** On receipt of the criminal record check, the divisional recruitment lead must; record the outcome; state if there has been any name change; record who has seen the original certificate and if there was any risk assessment required (Please see 11.0, Appendix 1).

**6.11** If the candidate is on the update service, then the original certificate must be seen and documented. This must include but not limited to; name of candidate; name of person completing the check; date criminal check was completed; issue date; details of disclosures that are present; type of criminal check (i.e. standard, enhanced) and the workforce this was checked against (i.e. Child, Adult, Child & Adult). All of which should be documented in the employee personal file, and the single central register.

**6.12** For contractors (self-employed, or through a recruitment agency), it is the contractor's responsibility to secure and provide a valid DBS and Overseas Check as appropriate before they complete any work for Blenheim. A contractor is a worker who provides services for an organisation under a contract for services. Independent contractors are not employees and are typically highly skilled, providing their clients with specialist skills or additional capacity on an as needed basis. The proof provided needs to be signed, copied and verified by the divisional recruitment lead and kept in their personnel file. The level of check for a contractor will vary depending on the work they are doing, and the following questions should be considered for contractors who are based at a school. (Please see 18.0, Appendix 8 for Contractor Guidelines)

- Will the contractor be working there in term time, or when students are present?
- Will the contractor be working there more than three times in a 30-day period?

If the answer to either of these questions is yes, the contractor should have an enhanced DBS including Children's Barred List.

**6.13** All clinical positions are subject to a registration check with the relevant statutory regulator, including but not limited to the Health and Care Professions Council (HCPC).

**6.14** You must ensure for those that are required to be registered under a professional body and/or previously worked in roles where this was a requirement, the appropriate body must be contacted please see below:

- Social Worker – [Social Work England Register](#)
- Police – [College of Policing Barred List](#)
- Teacher – [Teacher Regulation Agency](#)
- Nurse – [Nursing Midwifery Council](#)

**6.15** For candidates who have lived or worked outside of the UK at any point you must take a risk-based approach. This means that you should do more than the minimum requirement set out below if there is anything of potential concern revealed at interview or through any other interactions with the candidate, including other safer recruitment checks. The candidate should provide Overseas Criminal Records checks, this must always include the last 10 years as a minimum. If they were in a country for more than three months you can consider this as living there rather than visiting. As well as these additional overseas checks the candidate should undergo the same checks as all other candidates. The overseas checks must include:

- An overseas criminal records check. The home office has published guidance on criminal record checks for overseas applicants;

You will find here information on who to contact and how to contact them for every country:

<https://www.gov.uk/government/publications/criminal-records-checks-for-overseas-applicants>

- Teachers should be asked to provide proof of their past conduct as a teacher, issued by the professional regulating authority in the country they worked. If they are unable to provide this information we must obtain and verify an employment reference from their last teaching or school based role in that country. Advice about which regulatory or professional body applicants should contact is available from the National Recognition Information Centre for the United Kingdom, (UK NARIC).
- For any candidate who has worked in a school abroad in the last 10 years you must obtain an employment reference from the school they have most recently worked in and verify this over the phone, even if this falls outside of the standard 3 years. If there are any concerns you must go back further in their employment history. Obtaining this reference would not replace the requirement for an overseas criminal records check.
- On occasions where it is not possible to obtain an overseas check we must verify the reasons why and evidence it in the candidates' file, for example, if they spent less than 12 months in the country and they are required to be there for 12 months to complete an overseas checks. In these circumstances, a risk assessment must be completed and saved in the employee file (see 11.0, Appendix 1).

**6.16** For candidates with refugee status you should attempt to contact the relevant police force to confirm that gaining a police check from the country is not possible, this must be then saved in the personnel file. If no overseas police check is available, then additional references should be sought above and beyond the required two. The Operations Director, along with the accountable individual should be given sight of the complete file of pre-employment checks. If they are satisfied there is no risk to recruiting the candidate, then the file should be signed off and we can proceed to hire the candidate. If you are unable to seek and verify references you must not appoint.

**6.17** For anyone who has ever lived on a British Armed Forces Base overseas you need to gain an employment reference from the Armed Forces directly. It is unlikely an overseas criminal records check will be available in all cases. If we have not been successful in obtaining the overseas criminal record check, it is sufficient to get proof of employment of the individual, along with an employment reference from the Armed Forces. If the candidate was the spouse in these situations living at the base, it is necessary to see proof of the marriage certificate and if the spouse worked outside the base it is required to gain an employment reference from that employer.

**6.18** For appointments based in a school or college it is also necessary to check the individual is not prohibited from teaching. This is check required for all non-teaching roles working in an education setting, as well as

teaching roles, because of the high level of access to children in the non-teaching roles and the potential for future internal progression into a teaching role.

**6.19** Teaching prohibition orders prevent a person from carrying out teaching work in schools, sixth form colleges, 16 to 19 academies, relevant youth accommodation and children's homes in England. A check of any prohibition can be carried out using the 'Teacher Services' system' (<https://teacherservices.education.gov.uk/>). Prohibition orders are described in the National College for Teaching and Leadership's (NCTL) publication 'Teacher misconduct: the prohibition of teachers'. This needs to be carried out for all roles within an education setting.

**6.20** For all teaching roles we need to verify the candidate's qualified teacher status and the completion of teacher induction or teacher probation:

- This can be done using the 'Teacher Services' webpage for England (<https://teacherservices.education.gov.uk/>).
- For Scotland this can be done using General Teaching Council for Scotland (<https://gtcs.org.uk>).
- For Wales all education qualifications can be checked using Education Workforce Council (<https://www.ewc.wales>).

**6.21** For all Education management (including middle management) and senior management roles, (including group roles outside of the school structure, including; governors/ any teaching positions on the senior leadership team, and any teaching positions which carry a department headship) an additional check is required to ensure the individual is not prohibited under section 128 provisions. A section 128 direction prohibits or restricts a person from taking part in the management of an independent school, including academies and free schools. Where the individual will be engaging in regulated activity, a DBS barred list check will also identify any section 128 direction. So, a separate check for a section 128 direction is only required for management positions in our schools where the individual is not engaging in regulated activity and is not subject to a barred list check. A check for a section 128 direction can be carried out using the 'Teacher Services' system' (see 'Keeping children safe in education (2020 Update January 2021 (Post EU Exit))' and 'The Independent Educational Provision in England (Prohibition on Participation in Management) Regulations 2014').

**6.22** On receipt of a candidate's DBS (and other statutory checks) the Hiring Manager must review any information that is raised. If there is anything disclosed a Risk Assessment must be completed by the Hiring Manager and the operational 'accountable individual' for recruitment on site (as defined in the table at the end of this policy) to determine whether to appoint or withdraw the offer. Further sign off should be

undertaken by the Junior Business Partner or Senior HR Leadership and Operations Director. Please see Appendix 1 for the Risk Assessment pro forma. The risk assessment must be kept on the individual's file.

- 6.23** In respect of contractors/agency staff supplied by a third party, the Hiring Manager must obtain written notification from the third-party confirming they have carried out all the pre-employment checks that would normally be conducted internally (as set out in this policy). On the temporary worker's start date the manager must check that the person presenting themselves for work is the same person on whom the checks have been made by checking their proof of photo ID on their first day, as well as proof of their DBS check. See section 9 for full guidance on the recruitment of agency staff and contractors. (Please see Appendix 8 for Contractor Guidelines and Appendix 9 for Hiring Manager Sign Off Guidance which can be used by the hiring manager the check the file aligns to safer recruitment guidance)
- 6.24** All employees need to complete a Medical Questionnaire after they have been offered a role. This should be sent to the candidate with their offer pack and completed before a start date is confirmed. Once this is completed it should be saved in their HR file along with all other pre-employment checks. If anything is disclosed a Risk Assessment needs to be completed by the Hiring Manager and HR are available for guidance.
- 6.25** All employees whose roles involve driving will be subject to a driving licence check before they commence employment. This can be done by sending the candidate the Government licence checking website once they have been offered the role :<https://www.viewdrivingrecord.service.gov.uk/driving-record/licence-number>
- 6.26** All pre-employment checks (see 6.2) must be reviewed by the hiring manager / accountable individual, failure to do so will constitute gross misconduct. If anything is disclosed a risk assessment must be completed by the Hiring Manager and the operational 'accountable individual' for recruitment on site (as defined in the table at the end of this policy) to determine whether to appoint or withdraw the offer. Further sign off should be undertaken by a Junior Business Partner or Senior HR Leadership and Operations Director. Please see Appendix 1 for the Risk Assessment pro forma. The risk assessment must be kept on the individual's file.
- 6.27** For professional services positions only, risk assessments may be considered in extenuating circumstances for those whose references and DBS are not yet returned. Head of Department must sign a risk assessment and seek written consent from their Executive. Executives may sign or email their written consent and reasons for the risk assessment must be provided. Risk assessments will only be considered for positions

that do not pose a risk to children and or/ adults or the position does not conflict with any confidential information.

## **7.0 EMPLOYMENT OF PERSONS WITH CRIMINAL CONVICTIONS**

**7.1** Blenheim is committed to the fair and transparent treatment of all of its employees and job applicants. The importance of equality of opportunity for all is recognised, as are the benefits of having diversity of talent, skills and potential. As such Blenheim welcomes applications from as wide a range of applicants as possible, including those with criminal records.

**7.2** The existence of a criminal record does not lead to the automatic withdrawal of a conditional offer. A considered and objective decision will be made by the Operations Director taking into account the nature of the job vacancy and the background of the offences.

**7.3** Candidates will be asked about any personal circumstances involving child protection, criminal convictions and referrals to regulatory bodies at both application and interview. **It is the responsibility of the Hiring Manager to review the application form for any answers to these questions and question further either at interview or after the interview.** If a Hiring Manager is unsure of how to question around the information provided they should speak to the central resourcing team before the interview to see how to handle the questioning. A risk assessment must be completed by the Hiring Manager before the candidate is formally offered the role and signed off by Junior Business Partner or Senior HR Leadership, Accountable Individual and Operations Director.

**7.4** During the pre-employment checking process (following offer) candidates will also be asked to volunteer information not already disclosed. If anything is disclosed the Hiring Manager should speak to the candidate to question further and then flag to HR and the accountable individual to complete a risk assessment and agree next steps, along with sign off from the Operations Director. (See 11.0, Appendix 1 for further information).

**7.5** Applicants are asked to declare all 'unspent' convictions unless the nature of the position being applied for is exempt as defined in the Rehabilitation of Offenders Act 1974 (Exclusions) (Amendment) Order 2001 and Rehabilitation of Offenders Act (Exclusions and Exceptions) (Scotland) Order 2003 (as amended) and it is a requirement that an entire criminal record (including spent convictions) is declared including spent convictions. This is made clear in the recruitment literature. To clarify, for all roles working in regulated activity we would seek a declaration of all unspent and spent convictions. Applicants will be asked for all unspent convictions and conditional cautions, and all spent convictions and adult cautions that are not

protected as defined by the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (as amended in 2020).

**7.6** A candidate's failure to disclose any convictions as part of their application should lead to withdrawal of an offer of employment or considered as gross misconduct if this is identified at a later date. At interview an open discussion will take place about the declared convictions to aid the decision-making process. This discussion must be recorded and kept in the individual's file. If the candidate is dishonest at interview their offer of employment should be withdrawn.

**7.7** On receipt of a candidate's DBS (and other statutory checks) the Hiring Manager must review any information that is raised. If there is anything disclosed a Risk Assessment must be completed by the Hiring Manager and the operational 'accountable individual' for recruitment on site (as defined in the table at the end of this policy) to determine whether to appoint or withdraw the offer. HR should be consulted before a decision is made on whether to hire the individual. The risk assessment pro forma is held by the operational 'accountable individual' and HR can provide advice and guidance. The risk assessment must be kept on the individual's file. (Please see 11.0, Appendix 1 for further information).

**7.8** From November 28th 2020, consideration for changes to the DBS Filtering rules must be made before beginning a risk assessment for a disclosure on a DBS. The changes to the DBS Filtering Regime mean that old minor cautions and convictions will no longer need to be disclosed by the candidate when applying for certain roles, and these will be filtered out of a new DBS. Managers must be aware that an older DBS, dated before November 28th 2020, may disclose cautions and convictions that would now be filtered out and a risk assessment is no longer needed. The list of offences and cautions that can never be filtered out can be found [here](#). Offences and cautions on the filtered list are only filtered after certain time frames:

- The filtering periods for cautions are two years for under 18s and six years for those aged 18 and over.
- The filtering periods for convictions are 5.5 years for under 18s and 11 years for those aged 18 and over.

Standard and enhanced DBS certificates will always include convictions for specified offences, adult cautions for specified offences, and all convictions that result in a custodial sentence. The list of specified offences can be found [here](#). The list of specified offences includes a range of offences which relate to sexual or violent offences, or are relevant in the context of safeguarding.

## **8.0 EMPLOYMENT HISTORY AND REFERENCES**

**8.1** All offers of employment will be subject to at least two satisfactory references, one of which must be from their current/most recent employer. This is the minimum referencing requirement for someone to

start in the services in line with the regulations. Outcomes First Group has elected to go above and beyond by aiming to cover a full **three-year** referencing period, if the initial two references do not cover this. These additional references should be requested based on their relevance to the role and their length of service at that employment.

- The purpose of seeking references is to obtain objective and factual information to support appointment decisions. They should always be sought and obtained directly from the referee and must always come from a company email address.
- All references obtained from the candidate's current employer have been completed by a senior person with appropriate authority (if the referee is school or college based, the reference should be confirmed by the headteacher/principal as accurate in respect of any disciplinary investigations)
- You must compare the information on the application form with that in the reference and take up any discrepancies with the candidate, along with establishing the reason for the candidate leaving their current or most recent post, and ensure any concerns are resolved satisfactory before appointment is confirmed
- All employees must have a minimum of 2 years referencing. If for any reason, we are having difficulty obtaining references for the third year, after 3 full attempts (morning and afternoon) following phone and email chasers within a 28-day period, providing the employee has a clear, enhanced DBS returned, a risk based approach can be reviewed with Hiring Manager, Operations Director and HR sign off (See 11.1, Appendix 1)
- References should always be verified over the phone (using a landline number) or email verification can be obtained if from a legitimate source (professional email) whereby phone verification is not possible with the referee and a written record maintained.
- Character references must always be verified over the phone and email verifications are not acceptable in this circumstance.
- If a verification has been attempted three times in the space of three-weeks, and there has been no response from the referee, then a risk based approach may be taken. Evidence that the verifications have been sought and chased must be saved in the individual's file and risk assessment needs to be reviewed by both Hiring Manager, Operations Director and HR.
- If there is a cause for concern, based on a DBS result or information on a written reference etc, then the verbal verification must be completed to obtain as much information as possible to make sure the person is suitable.
- If a second employment reference is unavailable (e.g. recent lengthy gap in employment/ previous company closed/ only one previous employer) a character reference will be accepted in exceptional circumstances. This must be from 'a person of good standing in their community' or work in (or be retired from) a recognised profession (<https://www.gov.uk/countersigning-passport-applications/accepted-occupations-for-countersignatories>)
- [Ofsted Guidance for Children's Homes in England](#) require you to obtain 2 written references, including one from the applicant's last employer. You do not have to contact the person who wrote the reference to check that they did so, although this is good practice. You should always

check out a reference if you have any doubt about its quality or reliability.

- You may not be able to obtain a reference from a previous employer, for example because they are no longer operating, or have died. If this happens, you should ask for another reference from another previous employer.

**8.2** For internal candidates, references need only be sought for those employees' moving divisions or school.

- For internal candidates moving roles within the same division at least one reference should be obtained from the HR department.
- For internal candidates moving to another division references must be obtained following a file audit to account for any changes in the policy or specific requirements for the role.
- Before confirming their start date their file must be audited and signed off by the accountable individual. This is an opportunity to correct any historical omissions and account for any changes in legislation.

**8.3** For education appointments, including but not limited to; Teaching Assistants, Teachers and Senior Leadership Team, references should be sought on all shortlisted candidates before interview, so that any issues of concern they raise can be explored further with the referee and taken up with the candidate at interview. In exceptional circumstances we may be unable to approach a candidate's references prior to the interview if the candidate has withheld permission to do so using the applicant tracking system. **All references must be sought and verified before the candidate begins employment** (see 5.15 & 8.1).

**8.4** If a candidate for a teaching post is not currently employed as a teacher, but was previously, a reference should be sought from the school, college or local authority the candidate was most recently employed by, this also includes any work placements as part of their qualification.

**8.5** For any candidate who has worked in a school abroad in the last 10 years you must obtain an employment reference from the school they have most recently worked in and verify this over the phone, even if this falls outside of the standard 3 years. If there are any concerns you must go back further in their employment history to obtain further references. Obtaining this reference would not replace the requirement for an overseas criminal records check (see 6.14).

**8.6** A standard proforma will be used to seek references; in cases where referees prefer to write a letter instead of using the standard proforma, these employment references will be acceptable as long as they are addressed directly. Open references in the form of 'to whom it may concern' testimonials are not acceptable.

- 8.7** References should request details of all disciplinary offences and whether the candidate has been the subject of any child protection allegations or concerns, including the outcome of any enquiry or disciplinary procedure. Details of allegations that have not been substantiated, are false or malicious will not be sought. When a candidate's employment history has never involved working with children or young people, referees should still be asked about their suitability to work with children and young people. All information considered in the decision making should be clearly recorded along with the decisions made. They should not include information about concerns/allegations which are unsubstantiated, unfounded, false or malicious.
- 8.8** On receipt, references should be checked to ensure that all specific questions have been answered satisfactorily. The referee should be contacted to provide further clarification as appropriate, for example if the answers are vague. They should also be compared for consistency with the information provided by the candidate on their application form. Any discrepancies should be taken up with the candidate.
- 8.9** If a candidate discloses in their application, interview or during their on boarding process that they were previously involved in a disciplinary, or that they have ever been dismissed from employment, additional employment references must be obtained from the previous employer and verified over the phone. This includes any employment that falls outside of the standard 3-year period.
- 8.10** References should always be obtained and scrutinised with any concerns resolved satisfactorily, before the appointment is confirmed.
- 8.11** The Divisional recruitment lead will keep a record of all detailed checks of staff including identity, qualification requirements, and security checks.
- 8.12** In respect of contractors/agency staff supplied by a third party, the Hiring Manager must obtain written notification from the third-party confirming they have carried out all the pre-employment checks that would normally be conducted internally (as set out in this policy). On the temporary worker's start date the manager must check that the person presenting themselves for work is the same person on whom the checks have been made by checking their proof of photo ID on their first day, as well as proof of their DBS check. See section 9 for full guidance on the recruitment of agency staff and contractors.
- 8.13** A safer recruitment checklist is available from the central resourcing team, which can be used by manager to check the file.
- 8.14** Schools and colleges must keep a single central record, referred to in the regulations (described in the following paragraph) as the register. The single central record must cover the following people:

- all staff (including supply staff, and teacher trainees on salaried routes) who work at schools and colleges;
- and
- for independent schools, including academies and free schools, all members of the proprietor body.

**8.15** The information that must be recorded in respect of staff members (including teacher trainees on salaried routes) is whether the following checks have been carried out or certificates obtained, and the date on which each check was completed/certificate obtained (see above for required checks):

- an identity check;
- a barred list check;
- an enhanced DBS/Disclosure Scotland/Access NI check/certificate;
- a prohibition from teaching check;
- a section 128 check
- further checks for those individuals who have lived or worked outside of the UK
- a check of professional qualifications; and
- a check to establish the person's right to work in the UK.

For supply staff written confirmation from the recruitment agency that all checks have been carried out must be recorded (9.9)

**8.16** Withdrawals of job offers shall be made in writing and shall be made if a candidate does not provide satisfactory references, statutory checks, evidence of relevant qualifications, if it comes to light that false information was included on the application form or during the selection process, or if information was deliberately withheld during the recruitment process, and if the candidate is uncooperative during the pre-employment checking process.

**8.17** All employees will receive a contract of employment before their first day with the organisation. The contract should be sent through the applicant tracking system and candidates will complete an online acceptance of the terms & conditions.

## **9.0 AGENCY STAFF, SELF EMPLOYED CONTRACTORS AND BANK STAFF**

**9.1** Definition- Self Employed Contractors are workers who provide services for an organisation under a contract for services. Independent contractors are not employees and are typically highly skilled, providing their clients with specialist skills or additional capacity on an as needed basis.

**9.2** Definition- Agency Staff are workers employed through a third party, such as a recruitment agency. **The third party is responsible for undertaking all pre-employment checks for workers and ensuring they are safely recruited.**

**9.3** Definition- Bank Staff are employed directly through Blenheim. They are sessional workers who work flexible hours on demand and do not have contracted working hours.

**9.4** Definition – A volunteer is any individual who offers their time, skills, or support to the school without financial compensation. Volunteers may support a wide range of activities and learners with varying needs. Volunteers may include, but are not limited to:

- Parents or carers assisting in classrooms or on school trips
- Community members offering mentoring, coaching, or enrichment activities
- Student or trainees gaining experience in educational settings
- Professional providing specialist input

**9.5** In the event that a Bank Staff member applies for a permanent position within Blenheim, the usual recruitment and selection process must be followed. However, in circumstances where the Bank Staff member has regularly worked for Blenheim, documentation relating to their eligibility to work in the UK, DBS and references may be up to date and may not require all recruitment and vetting checks

**9.6** In the event that the Bank Staff member has not worked regularly or within the last 12 weeks, reasons for their gap in employment must be explored and verified in addition to requesting employment references for any recent places of work that are not stated on their original application form

**9.7** In respect of contractors or agency worker supplied by a third party, the Hiring Manager must obtain written notification from the third-party confirming they have carried out all the pre-employment checks that would normally be conducted internally (as set out in this policy).

- On the temporary worker's start date the manager must check that the person presenting themselves for work is the same person on whom the checks have been made by checking their proof of photo ID on their first day, as well as proof of their DBS check.
- A safer recruitment checklist is available from the resourcing team, which can be used by manager to check the file.
- You must obtain original documentation from the agency/contractor when they arrive at the service to commence on their first day.

**9.8** Agency candidates cannot move between divisions before ensuring that they have had the correct level of checks completed for that division and role.

**9.9** There must be written confirmation that each required element of the pre-employment checks has been completed and all required references have been received and verified.

**9.10** All qualifications and training required for the role must be confirmed with dates of attainment and renewal recorded where necessary.

**9.11** On the temporary worker's start date the manager must check that the person presenting themselves for work is the same person on whom the checks have been made.

**9.12** In education settings the written confirmation from the supplier must be held on the single central record. This includes confirming that the worker holds the relevant checks and the appropriate certificates, and the date that confirmation was received and whether any enhanced DBS certificate check has been provided in respect of the member of staff.

**9.13** For self-employed contractors, it is the contractor's responsibility to secure and provide a valid DBS and Overseas Check as appropriate before they complete any work for Blenheim. This needs to be signed, copied and verified by the divisional recruitment lead. A signed contractor agreement must also be signed and stored to set out the contractual obligations. The level of check for a contractor will vary depending on the work they are doing, and the following questions should be considered for contractors who are based at a school.

- Will the contractor be working there in term time, or when pupils are present?
- Will the contractor be working there more than three times in a 30-day period?

If the answer to either of these questions is yes, the contractor should have an enhanced DBS including Children's Barred List.

It is also the responsibility of the hiring manager to ensure that all other checks are adhered to for self-employed contractors. A process map can be obtained from the resourcing and compliance and onboarding teams to avoid any doubt.

**9.14** Contractors working directly for Blenheim (self-employed basis) are subject to the same pre-employment checks as a direct permanent employee.

**9.15** Any external consultants appointed must evidence Professional Indemnity Insurance and a copy retained on file along with the signed consultancy agreement

**9.16** As per Keeping Children Safe in Education 25, s313. Schools or colleges should obtain an enhanced DBS check (which should include children's barred list information) for **all** volunteers who are new to working in regulated activity with children, i.e. where they are unsupervised and teach or look after children regularly or provide personal care on a one-off basis in schools and colleges. As such, where volunteers are engaged in regulated activity such as unsupervised contact with children, they must meet all legal safeguarding requirements, including:

- Enhanced Disclosure and Barring Service checks
- Appropriate training and supervision
- Clear role descriptions and boundaries

**9.17** In the exceptional circumstance where an immediate use of a volunteer is necessary then they will not be permitted to undertake any regulated activities. A risk assessment will need to be completed and signed off by the Operations Director in consultation with Safeguarding and HR, risk assessment must be logged on the schools risk register. Volunteers are expected to uphold Outcomes First Group's promise, safeguarding policies and inclusive ethos, ensuring that all pupils, regardless of ability, feel safe, supported and respected.

## 10.0 INDUCTION

**10.1** An induction programme will be undertaken by all new colleagues and the hiring manager is responsible for arranging this. Certain elements of the induction will also be applicable to those who are changing roles within Blenheim.

**10.2** The content and nature of the induction process will vary according to the role and previous experience of the new colleagues, but as far as safeguarding the individual and promoting the welfare of children is concerned, the induction programme **must** include information about, and written statements concerning:

- The structure and role of relevant departments and/or services.
- Policies and procedures in relation to safeguarding and promoting the welfare of children e.g. child protection, anti-bullying, anti-racism, physical intervention/restraint, intimate care, CSE, Radicalisation, FGM, internet safety and any local child protection/safeguarding procedures.
- Safe practice and the standards of conduct and behaviour expected of staff and pupils in the establishment.

- Health, Safety and Welfare.
- How and with whom any concerns about issues should be raised.
- Other relevant personnel and school policies and procedures e.g. grievance, disciplinary, capability, absence management, computer usage, dealing with allegations of abuse against staff, and whistleblowing.

**List of Policy Amendments made for:**

Paragraph	Amendment	Reason for Change
6.14	Checking employee details for those who have worked in roles registered with professional bodies	Professional Body Compliance

## 11.0 APPENDIX 1 – RISK ASSESSMENT DBS

### Risk Assessment-

#### Personal Circumstances, Criminal Convictions & Regulatory Body Referrals

This form should be completed when assessing the individual's suitability for employment with Blenheim. Where anything has been disclosed throughout the recruitment process relating to any personal circumstances involving child protection, criminal convictions and referrals to regulatory bodies the Hiring Manager needs to discuss the information detailed and carry out a full risk assessment and gain full sign off before the individual commences employment. If it is deemed appropriate, the individual will commence employment with Blenheim. However, if it is deemed inappropriate for the individual to be working with vulnerable young people and adults, the offer of employment will be withdrawn. Please seek guidance and support from HR where applicable.

The risk assessment needs to be signed off by the hiring manager, accountable individual, **Operations Director**, and Junior Business Partner or Senior HR Leadership before confirming a candidates start date.

Please note that a risk assessment needs to be carried out for any existing staff with new disclosures on renewed checks. It is company policy to renew DBS/PVG/Access NI checks every three years.

From November 28th 2020, consideration for changes to the DBS Filtering rules must be made before beginning a risk assessment for a disclosure on a DBS. The changes to the DBS Filtering Regime mean that old minor cautions and convictions will no longer need to be disclosed by the candidate when applying for certain roles, and these will be filtered out of a new DBS. Managers must be aware that an older DBS, dated before November 28th 2020, may disclose cautions and convictions that would now be filtered out and a risk assessment is no longer needed. The list of offences and cautions that are now filtered out can be found here. Offences and cautions on the filtered list are only filtered after certain time frames:

- The filtering periods for cautions are two years for under 18s and six years for those aged 18 and over.
- The filtering periods for convictions are 5.5 years for under 18s and 11 years for those aged 18 and over.

Managers must also be cautious not to complete a risk assessment where candidates have disclosed cautions or convictions on their application form, or anytime throughout the recruitment process that no longer need to be declared due to the changes. Standard and enhanced DBS certificates will always include convictions for specified offences, adult cautions for specified offences, and all convictions that result in a custodial sentence. The list of specified offences can be found here. The list of specified offences includes a range of offences which relate to sexual or violent offences, or are relevant in the context of safeguarding.

Name of Applicant:		Date of Birth:	
Position Applied For:		Interviewed by:	
Location:		Date of Interview:	

Reason for the risk assessment (personal circumstance involving child protection, caution/warning/conviction/penalty disclosed on criminal check certificate, referral to regulatory body)

Please provide as much detail as possible and dates		Date
Were the offences disclosed on the application form, at interview stage or after offer? Please provide detail for each stage below.		
Application Form		
Interview		
After Offer		
If no for all of the above, please ask the individual to explain why they failed to disclose the information. Where there are variations, please explore differences		

Statement from applicant – this is an opportunity for the individual to explain any mitigating circumstances and defend their actions if applicable.

If criminal conviction, does the offence have a recommended rehabilitation period? Details can be found here on page 3	YES / NO / N/A
Details State the period and confirm if now considered “spent”	

Please detail the risks employing the applicant would pose	Measures to be taken to reduce any risks

Due to the information disclosed, do you have any concerns about this candidate working with children, young people or vulnerable adults in our care? YES/NO Please provide an explanation:

Would you advise that this person still be offered a position with the company? YES/NO If no, please justify:

If the person has been offered a position, would you advise that any extra training or supervision is necessary? If so, please advise and justify:

Have satisfactory employment references been received? YES/NO  
(Please pass these to the Responsible Individual for review)

To be completed by the Accountable Individual as registered with OFSTED:

Please indicate the matters taken into consideration when making your decision, for example, nature of conviction, time lapsed since conviction and rehabilitation period, has the candidate worked in a similar sector previously, how have previous employers assessed this candidate on the employment references, any mitigating circumstances:

Signed: \_\_\_\_\_ Date: \_\_\_\_\_  
Accountable Individual

Signed: \_\_\_\_\_ Date: \_\_\_\_\_  
Operations Director

Signed: \_\_\_\_\_ Date: \_\_\_\_\_  
 Junior Business Partner or Senior HR Leadership

## 11.1 APPENDIX 1 – REFERENCE / REFERENCE VERIFICATION RISK ASSESSMENT

### Risk Assessment – Missing References & Verifications

This form must be completed by the Line Manager where we are unable to obtain the required verified references despite multiple attempts.

<b>Name of candidate:</b>		<b>Job title:</b>	
<b>Department:</b>		<b>Location / office base</b>	
<b>Proposed start date:</b>			
<p><b>(A) List below the required references and verifications required to fulfil safer recruitment requirements and clearly state what is completed and what is missing.</b></p> <p><b>(B) If risk assessment is for missing reference in year 3 – please state which reference is missing, and that all 3 attempts to obtain this reference have been made including who by</b></p>			
<p><b>Please list below what has been done to try and obtain the reference/verifications</b></p> <p><i>Please detail how many attempts that have been made for the reference/verification and what has been put in place to assure suitability of the candidate in absence of this reference/verification.</i></p>			
<b>Has the DBS come back clear</b> If no, please complete the full risk assessment (Appendix 1 in the Safer Recruitment Policy)		<b>Yes</b> <input type="checkbox"/>	<b>No</b> <input type="checkbox"/>
<b>Following the risk assessment is the individual suitable to commence employment?</b>		<b>Yes</b> <input type="checkbox"/>	<b>No</b> <input type="checkbox"/>
Low risk <input type="checkbox"/>	Medium risk <input type="checkbox"/>	High risk <input type="checkbox"/>	
<b>Please provide details to summarise the decision.</b>			

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Signed: \_\_\_\_\_ Date: \_\_\_\_\_  
 Accountable Individual (Hiring Manager)

Signed: \_\_\_\_\_ Date: \_\_\_\_\_  
 Operations Director

Signed: \_\_\_\_\_ Date: \_\_\_\_\_  
 Junior Business Partner or Senior HR Leadership

## 12.0 APPENDIX 2 – ONLINE CHECK GUIDANCE

### Online Check Guidance

When performing an online check on a shortlisted candidate you can follow the below guidance.

Although the list is not exhaustive, you should check for the following information which could flag as a concern:

- Offensive or inappropriate behaviour, jokes or language
- Discriminatory comments
- Inappropriate photos or videos such as misuse of drug or alcohol misuse
- Homophobia, Extremism, Radicalisation or Transphobia
- Safeguarding Concerns
- Anything that suggests that the candidate is not suitable to work with children or vulnerable people and/or would harm the reputation of our organisation

### How to perform the search:

To perform the search, you must use a search engine such as google chrome, Bing or similar.

You can begin by typing in the name of the candidate, and their location to narrow down the search.

Once the results pop up, it may lead you to their social media pages such as twitter, Facebook and LinkedIn. You can click on these links. You do not need to have an account for any of these sites.

If they have a 'public page' you can then scroll through the initial pages to check if there is anything untoward on these pages.

You may also find results for any newspaper articles which mention them.

If you do find something untoward you must log this and report it to your immediate line manager.

If you do not find anything, comment 'Nothing untoward found' and sign and date it before uploading it to the candidate file.

You must complete the Online Check Proforma and have this signed off by line manager on completion before uploading it to the portal. This form can be obtained from the Resourcing Team. Also see Appendix 4.

## 13.0 APPENDIX 3 – ONLINE CHECK FAQ

### Online Check FAQ

#### What to do when you have completed an online check on a shortlisted candidate

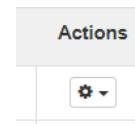
Once you have completed an online check and you are comfortable that there is nothing untoward found, you must upload this into their candidate record on reach.

You can do this by following the below steps on the candidate page:

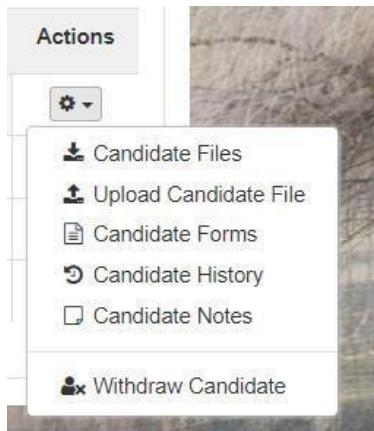
#### 1. Go to the candidate page for the candidate you have performed the check for:

ID	Name	Location	Application Submitted	Current Stage	Next Action By	Actions
111111111	Candidate Name	Camberley	2 months ago	Shortlist	YOU	

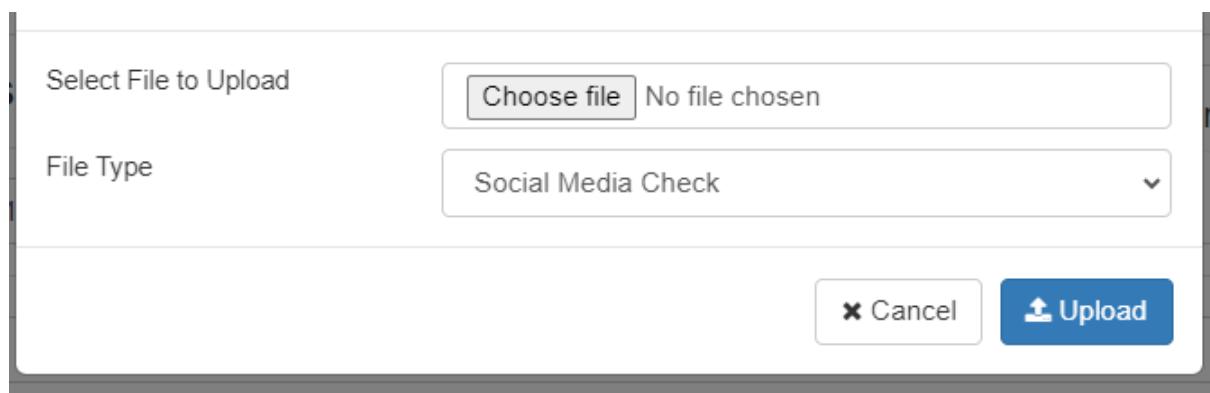
2. Select the drop-down box on the actions tab:



3. Once you have selected this you need to select 'Upload Candidate File'



4. Once you have done this, a pop up box will appear, please select the file to upload and in the 'File Type' select 'Social Media Check' and then upload



**What to do when I find something 'untoward' on a online check.**

If you find something untoward on their online check, you can upload this to their candidate file following

the above instructions.

You can then make an informed decision as to whether you are going to continue to shortlist/interview taking into consideration.

If the candidate queries your decision, please inform Head of Resourcing or email [recruitment@ofgl.co.uk](mailto:recruitment@ofgl.co.uk) who can advise you on next steps.

If you are performing a social media check for a candidate who is already an 'internal staff member' you must inform HR Operations Advice on [hroporationsadvice@ofgl.co.uk](mailto:hroporationsadvice@ofgl.co.uk) who will log the case and provide you with next steps

#### 14.0 APPENDIX 4 – ONLINE CHECK FORM

##### Online Checks Form

**Applicant Name:**

**School Name:**

**Position Applied for:**

**Date Check Performed:**

	Y/N?	Evidence
Safeguarding Concerns		
Offensive or Inappropriate Language/Jokes or Language		
Inappropriate Photos or Videos		
Radicalisation/Extremism or Homophobia/Transphobia		
Discriminatory Comments		
Anything that suggests that the candidate is not suitable to work with children or vulnerable people and/or would harm the reputation of our organisation		

Additional		
------------	--	--

**Person performing the Check:**

**Signature:**

**Line Manager Signature:**

**Date:**

## 15.0 APPENDIX 5 – INCLUSIVE AND EQUITABLE JOB DESCRIPTION CHECKLIST

Please use the checklist below as a reference point when drafting a new job description. Feel free to adapt and amend it as necessary. Save a version internally and share it with all relevant team members, such as HR and hiring managers.

For anyone writing job descriptions or involved in the recruitment process at Outcomes First Group, please ensure that the job description meets the criteria outlined below.

Area	Description	Check
Linguistic inclusion	The job description is in the correct language, acknowledging the areas in which we will be advertising this job.	
Linguistic inclusion	The job description language we have used is of the appropriate standard of the language for the candidate.	
Gender inclusion	The job description uses pronouns which are not specific to one gender over another. Use 'you' instead of 'he' or 'she' or 'they' ('you will be responsible vs. 'she will be responsible').	
Gender inclusion	The job description avoids gendered language (bias towards a particular sex or social gender). Keep all terminology as neutral as possible.	
Literacy inclusion	The job description is written in an accessible way as much as possible. E.g. keep sentences short, keep paragraphs short, use white spaces to reduce visual clutter.	
Literacy inclusion	The job description is written to the level of reading ability required for understanding its content. If necessary, get a second opinion on its readability to ensure it's fair for everyone who could be reading it.	
Cognitive inclusion /Neurodiversity	The job description uses simple fonts like Arial, Verdana, Tahoma, Century Gothic, Trebuchet, Calibri or Open Sans. Wavey, italic or blocky text is difficult to process.	
Cognitive	The job description uses bold where it's emphasising something.	

inclusion /Neurodiversity	Underlining and italics cause crowding.	
Industry inclusion	The job description does not contain jargon or many acronyms — and especially jargon that's specific to Outcomes First Group.	
Diversity inclusion	The job description does not contain phrases that bias towards those from a higher class. E.g. 'top tier university'.	
Diversity inclusion	The job description has a section which directly addresses that candidates from any background are welcome to apply.	

## 16.0 APPENDIX 6 – BLIND CV POLICY

### Contents

1. Introduction
2. Definitions
3. Purpose
4. Blind CV Reviews
5. Objective Evaluation
6. Promoting Diversity and Inclusion
7. Commitment to Equality
8. Specific Considerations for Education and Clinical Positions
9. Implementation
10. Responsibilities
11. Associated Policies and Procedures

### 1. Introduction

At Outcomes First Group, we are committed to promoting equality and diversity within our organisation. As part of this commitment, we have implemented a Blind CV Recruitment Policy to ensure fair and unbiased evaluation of candidates during our recruitment process.

### 2. Definitions

- **Blind CV Review:** The process of assessing candidates' CVs/resumes without considering any personal information that could lead to discrimination or unconscious bias.
- **Unconscious Bias:** Social stereotypes about certain groups of people that individuals form outside their own conscious awareness.

### 3. Purpose

The purpose of this policy is to provide a fair and objective recruitment process by removing identifying factors from CVs, thereby promoting diversity and inclusion within the organisation.

#### **4. Blind CV Reviews**

Blind CV reviews involve assessing candidates' CVs/resumes without considering any information that could lead to discrimination or unconscious bias. This includes details such as:

- Education dates
- Names of universities, schools, colleges
- Location of residence (unless role-specific, e.g., office-based/remote)
- Age
- Name
- Gender indications
- Hobbies
- Ethnicity

#### **5. Objective Evaluation**

By removing these identifying factors, we focus solely on candidates' experience, skills, and achievements. This approach allows us to make objective decisions based on merit.

#### **6. Promoting Diversity and Inclusion**

Implementing Blind CV Reviews helps us attract candidates from diverse backgrounds and ensure inclusivity throughout our recruitment process. We believe that diversity strengthens our organisation and enriches our workplace culture.

#### **7. Commitment to Equality**

Outcomes First Group is dedicated to upholding principles of equality and fairness in all aspects of our operations, including recruitment. Our Blind CV Recruitment Policy reflects our unwavering commitment to creating an environment where all individuals are valued and given equal opportunities for employment.

#### **8. Specific Considerations for Education and Clinical Positions**

We acknowledge that certain roles, particularly in education and clinical settings, have specific regulatory and statutory requirements that must be met. In line with Keeping Children Safe in Education (KCSIE) 2025 guidelines, applications for these positions must include the following information:

- Personal details, including current and former names, current address, and national insurance number
- Details of present (or last) employment and reason for leaving
- Full employment history (since leaving school, including education, employment, and voluntary work) with reasons for any gaps in employment

- Qualifications, including the awarding body and date of award
- Details of referees/references
- A statement of the personal qualities and experience relevant to the suitability for the post advertised and how the applicant meets the person specification

While Blind CV elements will still be incorporated to the extent possible (e.g., removing gender indications, hobbies, and ethnicity), certain details such as names, education dates, names of universities, schools, and colleges, and age (due to legal restrictions on employing individuals under 18) must be included to comply with legal and safeguarding requirements.

## **9. Implementation**

This policy applies to all central services (professional services) recruitment and will be adapted as necessary for education and clinical positions to ensure compliance with relevant regulations.

## **10. Responsibilities**

- **Hiring Managers:** Ensure adherence to the Blind CV Recruitment Policy during the recruitment process.
- **Heads of Department/Division:** Oversee the implementation of the policy within their respective areas.
- **Line Managers:** Support the implementation of this policy by ensuring objective evaluation and promoting diversity and inclusion.

## **11. Associated Policies and Procedures**

- Equality and Diversity Policy

## **17.0 APPENDIX 7 – Childcare Disqualification Declaration**

Under the Childcare Act 2006 and the Childcare (Disqualification) Regulations 2009, we need to confirm if you or anyone in your household is disqualified from working with children.

Please confirm:

- Have you been disqualified from providing childcare?
- Have you been barred from working with children by the DBS?
- Is anyone in your household disqualified from working with children?

If you have answered Yes to any of the above questions, please provide further information below:

Signed:

Date

## 18.0 APPENDIX 8 – Contractor Guidelines

### 1. INTRODUCTION

The attached guidance is provided to ensure the safety and compliance of contractors working on-site in keeping with [Keeping Children Safe in Education 2025](#) (KCSIE 2025) guidance to align to our Safer Recruitment and Selection Policy.

#### TERMINOLOGY:

- **Adhoc Contractor** – A company or independent tradesperson who is brought in to provide a service, that lasts no longer than 4 days in any one month
- **Regular Contractor** – Independent or self-employed individuals who undertake a consultancy agreement to provide materials or labour to perform a service or complete a job
- **Building Contractor** – A contractor who is responsible for construction projects or building works

### 2. ADHOC CONTRACTORS

An adhoc contractor is someone who performs work for you less than 4 days per month. If they provide work for you more than 4 days per month, then please see Regular Contractor guidance.

An adhoc contractor is often someone whose services you need to call in for adhoc works, or immediate support for things such as broken windows or electrical faults as examples.

#### GUIDANCE:

- A contractor who is coming to your site to support with various works should perform works before our pupils arrive on site, or after they leave.
- If the above is not possible, they must never lone work and must always be escorted around the premises.
- If the works is being carried out for longer than 4 days per month, but this is during the school holidays, whereby they will have no contact with pupils, this work still falls under the adhoc contractor guidance and thus the checks outlined in this process can be followed.
- You do not need to carry out reference or DBS checks on an adhoc contractor, however it is best practice to still check if they have one in place.

- If they confirm they do have a DBS check, you can ask them to show you the original copy and note that you have seen and verified this for your records, but you cannot store a copy of these details on site due to GDPR regulations.
- If they do not have a DBS in place, this would not be a reason to deny access, but we must ensure they are escorted at all times.
- It is also best practice to complete a basic social media check on the contractor who is visiting site to check for anything untoward.
- You can find a social media pro-forma in the Safer Recruitment and Selection Policy.
- If you do find something concerning, you must contact your Operations Director and inform them immediately.

### 3. REGULAR CONTRACTORS

A regular contractor is often someone who is self-employed, or an independent contractor through a company or agency that provides services such as 'Clinical Support' in the form of occupational therapy or play therapy as examples.

They often provide a service that is not often associated with a regular job role we would employ but where their services would provide regular support.

#### **GUIDANCE:**

- To bring in a regular contractor, they must go through compliance checks. It is the responsibility of the site to complete these checks.
- As soon as you have identified a contractor, you must first collect all relevant information for them outlined in the 'Contractor Compliance Form'
- You must ask the contractor to complete the 'Employment History and Gaps form' including their referencing details at the bottom of this form.
- You can obtain the above forms from our central compliance team on [newstarterchecks@ofgl.co.uk](mailto:newstarterchecks@ofgl.co.uk)
- Please note it is the responsibility of the site to ask the contractor to come in and verify their ID before sending them through to the compliance team.
- It is the contractor's responsibility to obtain the correct enhanced DBS (please ensure you confirm with them if they need Child Only or Child and Adult). If they are unable to obtain a DBS, this can be supported through [newstarterchecks@ofgl.co.uk](mailto:newstarterchecks@ofgl.co.uk) but they will be invoiced for the cost of the DBS.
- Once you have come to an agreement with your contractor you must provide them with a copy of a 'Contractor Agreement' and complete the relevant information for them to sign and return back to you.
- The contractor must complete an IR35 check and return it with their contractor agreement. They can do so using the following link: [Check employment status for tax - GOV.UK](#)

- If they are ‘inside IR35’ you must inform payroll@ofgl.co.uk so they can provide you with the relevant information on how to pay the contractor in line with government legislation.
- If they are outside IR35, the contractor can invoice us for their services.
- Once you have completed the form and obtained copies of their ID Documentation, DBS and Employment History and Gaps and references, completed contractor agreement and IR35 checks you can then send this to newstarterchecks@ofgl.co.uk and confirm what date you intend to bring the contractor into the business. They will store this information for you, but it is your responsibility to update your SCR with the information you have obtained for your records.
- The central compliance team will then check that we have enough information to safely bring the contractor to site and confirm with you an appropriate start date.

#### 4. BUILDING CONTRACTORS

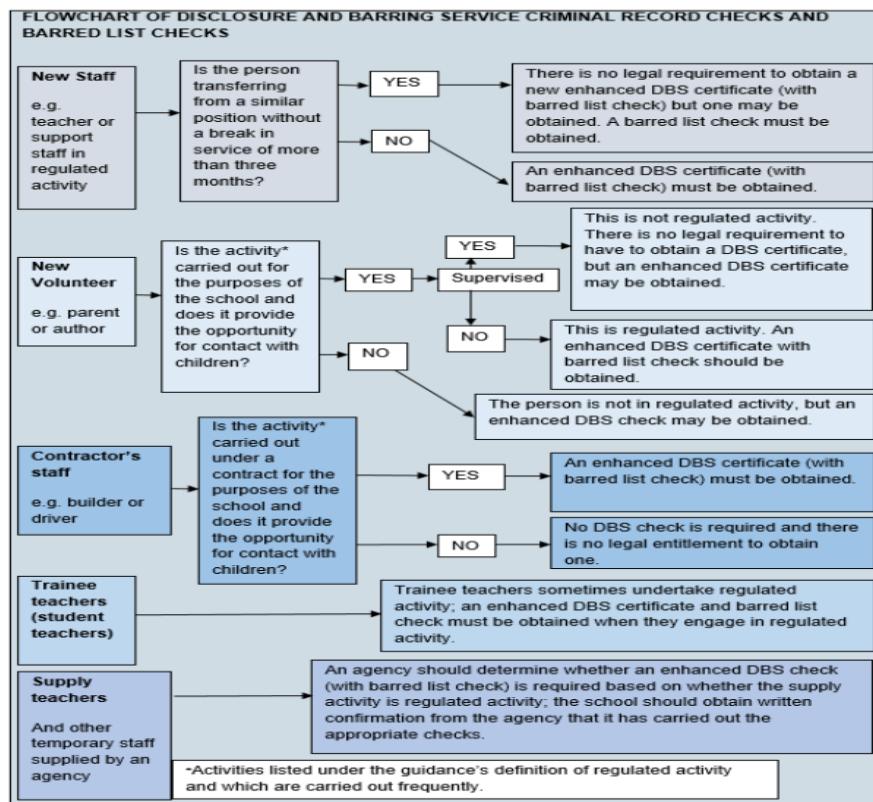
A building contractor is a person or company that specialises in all tasks related to construction work.

##### GUIDANCE:

- A building contractor who is coming to your site to support with various works, should perform works before our pupils arrive on site, or after they leave.
- If this is not possible, building contractors should be working in an enclosed building area and will not be in regulated activity or have access to our pupils. Building contractors may be required to work on site for more than 4 days per month. This is acceptable under this policy without the need for additional checks.
- If for any reason a building contractor needs to enter the site when the pupils are present, they must be escorted around the premises.
- You do not need to carry out reference or DBS checks on building contractors, however best practice is that you should check if they have one in place.
- If they confirm they do have a DBS check, you can ask them to show you the original copy and note that you have seen and verified this for your records, but you cannot store a copy of these details on site due to GDPR regulations.
- It would also be best practice to complete a basic social media check on the contractor who is visiting site to check for anything untoward.
- You can find a social media pro-forma in the Safer Recruitment and Selection Policy.
- If you do find something concerning, you must contact your Operations Director and inform them immediately.

If you are in doubt on any of the above guidance, you can also refer to [Keeping Children Safe in Education 2025](#) (KCSIE 2025) page 71 which provides guidance on when checks should be carried out. (Contractor Guidelines Appendix 1)

## CONTRACTOR GUIDELINES APPENDIX 1



Page 71 of KCSIE 2025

### 19.0 APPENDIX 9 – HIRING MANAGER SIGN OFF CHECKLIST

Checklist Item	Tick Box	Additional Confirmation/Notes
<b>Employee Name:</b>		
<b>Job Title:</b>		
<b>Full Application Form – with Full Employment History and Gaps covered since school leaving age</b>	<input type="checkbox"/>	Gaps in Employment Form:
<b>Right to work in the UK</b>	<input type="checkbox"/>	Document(s) provided:
<b>Relevant Qualifications – Signed and Verified (if relevant)</b>	<input type="checkbox"/>	List of Qualification(s):
<b>Professional Body Registration (if applicable)</b>	<input type="checkbox"/>	List Registration(s):
<b>References – Have you received all references covering the last 3 years,</b>	<input type="checkbox"/>	Have all references been verified? Are there any disciplinary concerns or safeguarding concerns?

<b>including one from their most current/recent employer?</b>		
<b>If they are education references, have they been verified with the Headteacher/Principal?</b>	<input type="checkbox"/>	
<b>Have any concerns that have been identified been escalated to Regional Director &amp; HR?</b>	<input type="checkbox"/>	
<b>Have you recorded the information appropriately?</b>	<input type="checkbox"/>	
<b>DBS – Does the candidate have a full, enhanced DBS check (is it Child Only or Child &amp; Adult depending on the requirements of your school?)</b>	<input type="checkbox"/>	Has the candidate registered on the update service?
<b>If they are not on the update service, if they have a OFG DBS – then they must re-apply for the update service within 12 months. If it is not a OFG DBS and they are not on the update service, then a new DBS must be applied for before they can commence work</b>	<input type="checkbox"/>	Is the DBS clear of all cautions and convictions?
<b>If no, have all convictions and cautions been reviewed with Line Manager, Operations Director and HR? Has a risk assessment been completed and signed off by Operations Director &amp; HR?</b>	<input type="checkbox"/>	
<b>Overseas Police Check – have they worked or lived abroad for 3 months or more in the last 10 years? If Yes, has Overseas Police check been obtained?</b>	<input type="checkbox"/>	Are there any concerns on the Overseas Police Check?  If so have they been escalated to Line Manager, Operations Director & HR?
<b>If yes, have they been reviewed with Regional Director and HR?</b>	<input type="checkbox"/>	
<b>Has risk assessment been reviewed and signed by Regional Director &amp; HR?</b>	<input type="checkbox"/>	
<b>Has Prohibition check been completed?</b>	<input type="checkbox"/>	Date of prohibition check:

<b>Has Section 128 been completed?</b>	<input type="checkbox"/>	Date of Section 128 check
<b>TRN Check (Teachers)</b>	<input type="checkbox"/>	Date of Check:
<b>Social Media Check Completed</b>	<input type="checkbox"/>	Date of Check:  If anything, untoward found, was it recorded and has it been escalated to Line Manager, Operations Director & HR?
<b>Print Name</b>		
<b>Signature</b>		
<b>Job Title</b>		
<b>Date</b>		



**Outcomes  
First Group**