

The aim of this policy is to ensure all people working with and supporting our vulnerable children are suitably recruited and checked to minimise any opportunities of attempted or actual harm to children. This includes recruiting and selecting the right people who have the qualities and high standards of practice which our children require to increase their chances of success. Our Safer Recruitment Policy is based on five underpinning principles as identified by the NSPCC and each stage focuses on the protection and safeguarding of children and young people.

1. Pre-Recruitment
2. Selecting the right people
3. Choosing wisely
4. Checking thoroughly
5. Induction and remaining vigilant

Line managers are responsible for recruitment decisions, in conjunction with the Recruitment department. The company aims at all times to recruit the person who is most suited to the particular role. Recruitment will be solely on the basis of the applicant's abilities and individual merit as measured against the criteria for the role. Qualifications, experience and skills will be assessed at the level that is relevant to the role. As part of this undertaking, the agency has rigorous recruitment and selection procedures that apply to all individuals in order to establish their suitability to work with children and young people. This includes additional checks for those carrying out regulated activity. **Regulated activity** means a person who will be:

- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children.
- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children.
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not.

The recruitment process aims to create and maintain a safe workforce and contains robust vetting procedures which are applied consistently and methodically to ensure that those selected for employment are suitably qualified and are appropriate to work in the identified role.

1. Pre-Recruitment

In the pre-recruitment stage the following procedures will be adhered to:

- The line manager must ensure that there is an up-to-date job description including reference to the employee's responsibility in respect of safeguarding. The job description will describe the duties, responsibilities and level of seniority associated with the post, while the employee specification will describe the type of qualifications, training, knowledge, experience, skills, aptitudes and competencies required for effective performance of the job.

- All managers involved in the interviewing process will have appropriate knowledge and skills to interview for role.
- A reasonable timeframe will be put in place for the recruitment process, which allows sufficient time to review the application form, conduct a thorough selection process and reflect on the process and decision making.
- All adverts will include the agency's commitment to safeguarding statement for example *"We are committed to safeguarding and promoting the welfare of all our children and young people. We are committed to safeguarding and we have a high expectation that all staff and volunteers share this commitment. An enhanced DBS Disclosure is required for this post"*.
- All adverts will be reviewed by the Marketing team and line manager before they are advertised to ensure they are specific to the post appeal to suitable candidates with an oversight from HR to ensure that they comply with employment law.
- There will be discussion between the senior leaders about the role that is being advertised and the qualities required.

2. Selecting the Right People

Compass Community is committed to applying its Equal Opportunities policy at all stages of recruitment and selection. Shortlisting, interviewing and selection will always be carried out without regard to gender, gender reassignment, sexual orientation, marital or civil partnership status, colour, race, nationality, ethnic or national origins, religion or belief, age, pregnancy or maternity leave or trade union membership.

Any candidate with a disability will not be excluded unless it is clear that the candidate is unable to perform a duty that is intrinsic to the role, having taken into account reasonable adjustments. Reasonable adjustments to the recruitment process will be made to ensure that no applicant is disadvantaged because of a disability.

In the selection stage the following procedures will be adhered to:

- Only a full application form with detailed and complete previous work history will be accepted for employed roles.
- Pre-screening applications takes place to ensure that the applicant meets the basic criteria for the role and national minimum standards for Residential, Fostering and Education.
- Application forms are reviewed, and any discrepancies or anomalies are resolved prior to any offer of employment.
- The selection process varies depending on role but is designed to ensure that suitability to role is assessed, this will include an interview and may include other selection methods including observations, presentation, desk top exercise etc.
- Appropriate questions will be decided for the interview based on the role being advertised to draw out the experience and attitudes from the candidate.
- For education roles, we will aim to obtain two references before interview, where possible, one of which will be a professional reference (from the current employer where possible).
- Appropriate questions will be decided for the interview based on the role being advertised to assess suitability to role.

3. Choosing Wisely

- The interview panel will normally consist of the immediate line manager and one other person whom is preferably familiar with the area of work and responsibility. If the line manager is not available then the delegated responsibility must go to a more senior manager for example, in our residential service if a Service Manager is not available, another Service Manager or the Regional Operations Manager will lead the interview and will be supported by one other person who is preferably familiar with the area of work and responsibility.
- All recruiting managers involved in the interviewing process will be trained in safer recruitment through the NSPCC. All members of staff with DSL responsibilities will remain safer recruitment trained at all times and will renew their training at least every three years.
- If the recruiting manager identifies a conflict of interest i.e. the candidate is known to them, this must be declared and an appropriate independent manager should lead the interview.
- References will be sought before an offer is made, if there has been a disclosure relating to past or current investigation, disciplinary, safeguarding concern or DBS referral. An offer will not be made until this has been explored and satisfactorily resolved unless permission has been granted by the appropriate Director.

For all interviewees:

- Candidates are required to bring original documentation to the interview including relevant qualifications and where applicable professional registration.
- Candidates are required to bring original documentation to the interview to confirm their identity and eligibility to work in the UK.
- Records and notes will be kept throughout the interview to ensure an accurate record of the applicants answers are kept for later discussion.
- Line managers conducting recruitment interviews will ensure that the questions that they ask job applicants are not in any way discriminatory or unnecessarily intrusive. The interview will focus on the needs of the job and skills needed to perform it effectively.
- In the event that a candidate self-reports any past or ongoing issue relating to an investigation, disciplinary, reference, safeguarding and DBS, the recruiting manager is advised to explore further and needs to ensure that evidence is gathered to satisfy that any issues are fully understand before proceeding to the next stage.
- Candidates may also be assessed to attend a suitability day which may form part of the selection process for some roles.
- After every interview there will be time allocated for applicants answers to be scored by the individual interviewers.
- Once the scores are allocated by interviewers there will be time for interviewers to discuss opinions. It is expected that interviewing team constructively challenge each other if there are differing opinions until a conclusion is agreed.
- A record of every recruitment interview must be made and passed to the recruitment team and will be retained for a suitable period of time.
- Job offers will not typically be given on the same day as the interview to ensure there is time to reflect before the offer is made formally.
- When an offer of employment is initially made verbally, this will always be confirmed in writing.

- When appointing Operations Managers and Social Workers, in addition to the above process, we will try to have at least two foster carers form a separate, second, interview panel. Whilst data protection is adhered to at all times (no personal information is shared and this panel do not have access to application forms), this panel have their own questions and take notes. Whilst we value the input of our carers and shared discussions are held after the interviews, the decision to appoint is made by the first and main interviewing panel.
- When appointing for roles in residential, in addition to the above process, candidates will be asked to complete a resilience questionnaire which will try to establish some core values they hold. This will be referred to and their responses will be explored during the interview.
- When appointing for roles in education, the interviews will be conducted by at least two Managers both trained in safer recruitment with one who will be an experienced DSL.

4. Checking Thoroughly

We will carry out thorough pre-employment checks and where appropriate, copies will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below. For those starting work in our Education Service we will record all information on the checks carried out in the school's single central record (SCR). For further information please see the Single Central Register Guidance document.

Appointing New Staff

All offers of employment are conditional and subject to the following:-

- Verification of their identity, please note for the purposes of DBS ID can be verified and certified by the post office.
- Satisfactory enhanced DBS disclosure certificate where the post is exempt from the Rehabilitation of Offenders Act. The candidate is required to be/become a member of the DBS Update Service (role dependent).
- Completion of a health questionnaire and verification of their mental and physical fitness to carry out their work responsibilities (role dependent).
- Verify their right to work in the UK.
- Receipt of original documentation evidencing professional qualifications and membership, as appropriate (role dependent).
- Ask for written information about previous employment history and check that information is not contradictory or incomplete. Where there are any gaps identified in the employment history, candidates will be required to explain these and this will be documented. A full education & employment chronology will be finalised as part of the recruitment process.
- The applicant will be required to provide an Overseas Police Checks (Certificate of Good Conduct or similar) from any Country they have worked or lived abroad for over a month in the last 5 years. The candidate must provide a private residential address (could be air BNB/guest house/family or friends home/rental property etc). If they are unable to provide this, we will probe this until satisfied and detailing the reason 'why' this wasn't possible.
- Current Social Care England and Wales, Professional Indemnity Insurance, Car Insurance and MOT certificates, if relevant to the role.
- Satisfactory completion of social media checks.

- For roles that require candidates to drive, before they are allowed to do so they must provide the Company with a check code obtained from <https://www.gov.uk/view-driving-licence> so that their entitlement to drive, any penalty points or disqualifications can be established.
- Three references will be sought directly from referees, one of which must be the applicant's current or most recent employer, who must be able to comment on the applicant's performance and suitability for the role. These will be scrutinised and any concerns will be resolved before confirming appointments.
- If an applicant has more than one current employer, references will be sought from each one. References will also be accepted where it is company policy to only provide basic information from Human Resources. The second professional reference should preferably be a previous employer or professional contact. The third reference is a personal one but not obtained from spouse, partners or family members. Whilst we seek to obtain 3 references, employment can commence on receipt of 2 references, one to be the most recent employer(s).
- References should normally be in writing. Verbal references may only be given once the identity of any caller has been verified. If a verbal reference is given, a written record of the information provided must be made at the time of the conversation using the standard reference forms.
- References or testimonials provided by the candidate will only be accepted in addition to the above mandatory references.
- A review of the reference period is undertaken to ensure that we are satisfied that an appropriate period of time and experience has been explored through the reference process. A risk assessment will be completed where only a short period of time or information relating to experience relevant to the role is available.
- Follow-up verification telephone calls are made to each referee to confirm their identity, that they have written the reference and have the authority to provide the reference, explore the contents of the reference if required, and to clarify any safeguarding/disciplinary issues. Where referees are unable to comment on suitability to work with children, as the role they have conducted when employed with them was not related to working in social care, this will be clearly stated.
- Any information received on references that may be cause for concern will be shared with the line manager during the compliance process.
- Where an applicant has worked with young people and/or vulnerable adults, we will make attempts to contact all employers. This is to verify the applicant's dates of employment, reasons for leaving, any safeguarding or disciplinary issues. Part of our practice is to follow these up, by telephone/email where possible, in order to clarify this information. The same check will be carried out if the applicant has ever worked abroad in any capacity.
- For those applicants working in Education, carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK, including (where relevant) any teacher sanctions or restrictions imposed by a European Economic Area professional regulating authority, and criminal records checks or their equivalent.
- For those roles working in Education in a management position, carry out further additional checks to ensure that are not subject to a prohibition from management (section 128) direction made by the secretary of state.
- For those roles working in Residential, Managers will sign off suitability to role by conducting schedule 2 checks as part of regulation 32 and regulation 28.
- For those roles working in residential where the home is not yet open, an agreement will be put in place confirming the working arrangements that will be put in place until the home is open.
- A risk assessment may be put in place as pre-employment checks are finalised however, this does not include where we are awaiting the return of a DBS and current reference.
- When opening new homes, managers will have access to personal data and will assist the HR team in safe recruitment in relation to references and ID.

Any offer of employment will be conditional on these being satisfactory. Compass Community will make their recruitment decisions on the basis of all the information available to them.

Quality Assurance and Compliance Checks

Prior to starting work, on completion of all the pre-employment checks, a quality assurance process is undertaken. The first step is an internal review within the HR service for all files. For those starting work in the residential service a final quality assurance check is completed by the Registered Manager of the home (or in their absence an alternative Registered Manager or Regional Operations Manager) to confirm that they are satisfied that from a safeguarding perspective that this person is suitable to work with children and young people in their service.

During employment the HR service, Registered Managers and Regulation 44 Inspectors conduct periodic reviews of staff files to ensure that they remain compliant and safe to work.

Assessing Suitability in Exceptional Circumstances

In the event of extreme and exceptional circumstances (for example COVID19) it may be appropriate to change our recruitment process. The decision to do this will be made by members of the Operations Board and any change in approach will be assessed to ensure that safer recruitment principles are adhered to the ability to assess a candidate suitability to role is not compromised.

Existing staff

If we have concerns about an existing member of staff's suitability to work with children, we will carry out all the relevant checks as if the individual was a new member of staff. We will also do this if an individual moves from a post that is not regulated activity to one that is.

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child:

- Where the 'harm test' is satisfied in respect of the individual (i.e. that no action or inaction occurred but the present risk that it could was significant).
- Where the individual has received a caution or conviction for a relevant offence.
- If there is reason to believe that the individual has committed a listed relevant offence, under the **Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009**
- If the individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left.

Student Social Workers

Although Student Social Workers are not employed by Compass Community when on placement, we endeavour to complete the same recruitment checks in order to comply with Ofsted recruitment regulations, therefore we will obtain the following information prior to the commencement of a placement:

- DBS check (however students can start on placement with the DBS obtained by the university)
- All necessary ID – proof of name (including name changes), photo ID and proof of address

- A letter/reference from the university stating that there have been no concerns that would prevent them from starting placement
- A personal reference and if possible a previous work reference
- Completed chronology
- Car insurance with business cover and MOT to enable travel on company business

Education Services

For all staff who are employed to work in one of our schools, regardless of role, we will carry out a DBS check including those people working in support roles.

When recruiting teachers the safer recruitment policy will be followed. The Company will also complete an additional Section 128 Check and Teacher Prohibition Check where necessary to ensure all teaching staff are not barred from working or managing as school setting.

Registered Managers

In agreeing to Compass registering with Ofsted, employees are making a commitment to the children, the staff and the home. If they leave whilst applying to register and the registration fee has been paid we will look to deduct this from their final salary. Once registered, if they leave within 12 months of their registration date, the registration fee will be deducted from their final salary.

Agency and third-party staff

- We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.
- For agency workers we accept a valid enhanced DBS certificate from the agency provided it is dated within the last 12 months. As part of the agency checks the agency send a copy of the DBS results and the original certificate is then seen and verified with the agency workers ID on their first shift.

Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check. This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children.
- We will obtain the DBS check for self-employed contractors.
- We will not keep copies of such checks for longer than 6 months.
- Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.
- We will check the identity of all contractors and their staff on arrival at the school.

Volunteers

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Obtain an enhanced DBS check without barred list information for all volunteers who are not in regulated activity, but who have an opportunity to come into contact with children on a regular basis, for example, supervised volunteers
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check for any volunteers not engaging in regulated activity

School Governors

- All governors will have an enhanced DBS check with barred list information and section 128 check where appropriate.
- The School Proprietor will have their DBS check countersigned by the secretary of state. All proprietors and governors will also have the following checks:
 - Right to work in the UK
 - Other checks deemed necessary if they have lived or worked outside the UK

Adults who supervise pupils on work experience

- When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.
- We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

5. Induction and Remaining Vigilant

All staff within Compass have the responsibility to safeguarding our children and are expected to have a 'it could happen here' approach. To ensure that all newly appointed staff understand how central this is to the wider organisation culture there is robust induction process in place. For more information, refer to the individual Induction Policy in the employee handbook.

All new employees will receive the Induction Programme relevant to their role. Line Managers are responsible for the employee's induction in relation to their particular role and as such their understanding of relevant policies and procedures. This will include being explicit about role boundaries and professional propriety.

Whistle-blowing

All employees are provided with the agency's Whistle-blowing policy as part of their induction. It is sent to all freelance staff upon satisfactory completion of vetting procedures. Staff are encouraged to voice any concerns about the attitude or conduct of colleagues either through the internal whistle-blowing policy.

Supervision

Supervision is a planned process that is part of the agency's performance management procedures and timescales are set out in the Supervision policy. An organisational pro-forma sets out the supervision meeting agenda, with safeguarding forming part of the discussion. This enables the agency to ensure employees are continually clear about professional standards, boundaries and organisational objectives and allows employees to raise concerns or difficulties and also reflect on their own practice. Supervision notes are appropriately recorded, agreed by both parties and stored centrally within individual's personnel files, Resitek and on Compass People. For more information, refer to the Supervision and Appraisal Policy in the employee handbook.

Training

The company has a structured organisational development programme that offers a range of safeguarding courses in each region throughout the year. This is to equip staff with the knowledge and skills to recognise and respond appropriately to child welfare concerns.

During the induction process the line manager is required to carry out an assessment to establish the individual's training needs and identify priorities and timescales for completion of the core training. For some roles such as Supervising Social Workers and Operations Managers there are mandatory training courses that need to be completed before new starters to the organisation can successfully pass their probation period.

In addition to internal training, further in-depth safeguarding training is delivered by an external provider for those working directly with children and young people and those with a designated lead role for safeguarding in the organisation. Individual needs are regularly reviewed and considered as part of the supervision and appraisal process. For further information, please refer to the Training policy.

Single Central Register

In Education, the Single Central Register (or record) is a safeguarding document that is key to ensuring staff or other people that have access to the school are as safe as it is possible to be.

The SCR is a live document of all staff and adults that are frequently in the school or have a responsibility for the school. It is required to be updated on a regular and frequent basis to ensure it gives a true picture of the staff in place and to confirm all relevant and statutory checks have been undertaken and are satisfactory.

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