



Recruitment and Selection Policy and Practice

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1 INTRODUCTION

This policy has been developed with reference to the Department for Education (DfE) statutory guidance “Keeping children safe in education” (KCSIE), the supporting document “Keeping children safe in education: information for all staff”, “Working Together to Safeguard Children”, the statutory guidance on alternative provision, and the DfE “Non-school alternative provision: voluntary national standards”. CFCC is a non-school alternative provision provider and therefore adopts the relevant safer recruitment principles and voluntary national standards as part of its safeguarding and quality assurance arrangements.

The purpose of this policy is to ensure that recruitment decisions are based on suitability, safeguarding, qualifications, experience, integrity and the needs of the young people supported by CFCC. Checks will be completed before a person starts work unless a specific lawful exception applies and has been risk assessed and authorised by a Director. This policy is intended to be read alongside CFCC’s Safeguarding and Child Protection Policy, Staff Code of Conduct, Disciplinary and Capability procedures, Data Protection arrangements and Recruitment of Ex-Offenders policy.

“Keeping children safe in education” and the supporting document “Keeping children safe in education: information for all staff”, as well as the earlier released, “Working Together to Safeguard Children: A guide to inter-agency working to safeguard and promote the welfare of children”.

CFCC shares the same objectives stated in the above guidance, to help keep children, young people and young adults safe by contributing to:

- providing a safe environment for students to learn and live.
- identifying students who are suffering or likely to suffer significant harm, and taking appropriate action with the aim of making sure they are kept safe both within the home and in the education setting.

2 SAFER RECRUITMENT AND SELECTION

2.1 PREPARATION AND PLANNING PRIOR TO ADVERTISING

The wording of every advertisement of a post with CFCC is thoroughly reviewed each time an advert goes to press and includes a statement about our commitment to safeguarding and promoting the welfare of children and for the need for the successful applicant to undertake a DBS Enhanced Disclosure with Barred List check. Advertisements also state that it is an offence to apply for a role if the applicant is barred from engaging in regulated activity with children.

Application forms are used for all posts and references are required firstly from the applicant’s current or most recent employer, one other source providing a character reference.

2.1.1 Candidate Application Pack

A candidate information pack will be sent to all applicants. It includes the following:

- Job description
- CFCC Selection Criteria
- Application form
- Diversity monitoring questionnaire

- Rehabilitation of offender's document
- Safeguarding and Child Protection Policy and Practice document

2.1.2 Application Forms

Completed application forms are required for all appointments and interviews take place for all shortlisted candidates even if there is only one person shortlisted.

2.1.3 Health Related Questions

The Equality Act 2010 limited the circumstances under which pre-employment health questions could be asked. Questions can only be asked to enable an employer to:

- Decide whether an applicant can carry out a function that is essential (intrinsic) to the job.
- Decide whether to make any reasonable adjustments for the person to the selection process.
- Monitor diversity.
- Take positive action to assist disabled people.
- Assure themselves that a candidate has the disability where a job genuinely requires the jobholder to have a disability.

A job applicant can be asked relevant questions about disability and health in order to establish whether they have the physical and mental capacity for the specific role.

2.1.4 Shortlisting

Shortlisting involves at least two people and is completed against the criteria for the post. All applications are read and considered.

References are requested immediately for shortlisted candidates.

If candidates or referees disclose any information regarding safeguarding issues as they relate to the applicant, this will be fully investigated and recorded by contacting the relevant referees and the Local Authority Designated Officer (LADO).

2.1.5 Invitation to Interview

An invitation to interview letter is sent out to all shortlisted candidates, which explains the structure and content of the interview process.

Shortlisted candidates who have declared a criminal conviction on their application form includes a 'Rehabilitation of Offenders Act 1974 section' that must complete either prior to, or on the day of the interview.

Candidates are required to bring to interview any documentation that confirms educational and professional qualifications for verification.

2.1. Internal Candidates

All internal candidates for substantive posts at CFCC will be expected to go through exactly the same procedure as external candidates, e.g. completion of application forms, references, interview, etc. References will be sought from their line manager prior to interview.

2.2 The interview process

The interview process is designed to assess the merits of each candidate against the job requirements, to assess their suitability to work with children or vulnerable

young adults and in particular:

- their attitude towards children, young people and young adults, and their motivation for working with them.
- exploring their skills and asking for examples of their experience relevant to the role applied for
- their understanding of and ability to support the establishment's agenda for safeguarding and promoting the welfare of children, young people and young adults.
- exploration of any gaps in their employment history
- exploration of any concerns or discrepancies arising from the information provided by the candidate and/or a referee.
- ensuring they are physically and mentally capable of performing a role working with complex SEMH children and young people.

Any concerns or discrepancies arising will be explored with the candidate and the process recorded and retained by the interview panel.

There will always be a final opportunity for the candidate to declare anything in light of the requirement for an enhanced DBS with barred list check.

Interviews will always be conducted with at least two interviewers. The Directors/Operational Director must hold an up-to-date Safer Recruitment training certificate.

Interviews for all posts with CFCC Ltd will comprise of:

- meeting the interview panel, an introduction to the day including how the day is to be structured, order of interviews, housekeeping issues, and a reminder of conduct whilst on site.
- briefing on the company
- tour of site and buildings
- repeated opportunities for questions

Interview questions are designed to give each candidate an equal opportunity to respond. The same questions are used for each candidate but follow up questions will be contextual.

Whilst interviews are progressing candidates will meet with admin our Operational Director to complete recruitment checks, including qualifications, reference information, gaps in employment history, etc. The results of this discussion are presented to the interview panel to inform decisions about appointment and/or be discussed in more detail by the panel.

All interview panellists make notes about candidates' answers on the interview recording format in order to aid discussion at the end of the process and to provide a record of the interview process.

2.2.1 Involving Students

Students are involved in the following ways:

- meeting and greeting candidates as they tour the site.

2.3 DETAILED INTERVIEW PROCEDURES

All interview panel members must be fully briefed on the interview process prior to interviewing. This cannot be on the day of the interview.

The day must be planned for in advance. It is usual to have at least 2 interviewers as this helps objectivity and debate.

Whoever is leading the interview day should have a candidate file ready at interviews and should have ALREADY explored issues that may need to be clarified during or at the end of individual sessions. If references are available these should

also be checked for possible issues. Any salary issues should be raised for clarification at the end of individual interviews.

The interview day commences with the panel meeting all candidates as a group. Items covered to include:

- Introductions
- Briefing on CFCC – this should be a concise picture of the company, its general philosophy (high quality, real personalisation, holistic blended model building a community that works therapeutically, multi-disciplinary)
- Briefing on generalities of role remembering that the candidates should already be prepared from their pre-interview documentation.
- Description of how the interview process works – why we write down what they say, (as that is what they are scored on) and the need for them to give as complete an answer as possible and listen carefully to the questions.
- Address possible nerves and remind them that this is a 2-way process.
- Describe how and why we run debriefs and that these should be available immediately if required when we phone them unless arranged otherwise.
- Check that we are able to contact candidates on the day/evening with the result of their interview.
- Give opportunity for questions at intervals throughout the time.
- Tour of site and buildings

The choice of interview room should try and ensure that whichever room is used, it is as free from, or as far away from distractions or overhearing as possible.

Admin recruitment checks are undergone on the day of the interviews in between individual interview sessions.

2.3.1 Conducting the Interview

Interview recording sheets should be handed to the panel. It is important the interviewers adhere to the exact questions given on the interview recording sheets.

Irrespective of anything we know about a candidate, the scoring must be on the technical answers given and not influenced by prior or contextual knowledge. Interviewers should write notes on their record sheets that reveal what candidates have said in a factual sense. There may be minor differences between interviewers' records, but collectively they should only note what was said, not an opinion about what has been said. Interview records CANNOT be a subjective response on behalf of the interviewer. In adhering to equal opportunity each candidate should be asked their questions without prompts. This is what is scored.

2.3.2 Decision Making

At the end of the interviews after moderation by interviewers of their own scores, each record sheet is totalled. The person leading the interview process creates a table where each score for each candidate is entered so that the panel can see both how they compare in scoring and whether or not there is an outstanding candidate on scores alone.

Debate may well take place at this point about how each interviewer has scored a particular candidate if there are extreme discrepancies. If so, the panel should agree a moderation and individual scores adjusted if needed. Any references arriving during the interview process should be checked.

The idea of a threshold level is so that the panel can see clearly if a candidate is above or below what we term a threshold for employment. The

higher above the threshold, the stronger the candidate and the more secure is the decision to employ at that time.

Anyone falling below the threshold is unlikely to be the preferred candidate, but it does not mean that they cannot be considered for, or offered, a post, but there would need to be clear evidence why. This is another example of why scores should be moderated, as individual interviewers may be more generous overall whilst another may be scoring lower overall. Therefore, the threshold score is an indicator to support discussion not an absolute cutoff. It is usual to contact the chosen candidate(s) first in case there is a problem with the offer. Unsuccessful candidates should be contacted following this process unless the panel decide that no job offer of any kind is appropriate, in which case there need not be a delay in contacting them.

Feedback to candidates should be clear and accurate as decided by the panel prior to any phone calls being made.

2.3.3 De-Briefing Candidates

Once a decision has been reached the panel should collectively agree the key items of feedback to a candidate. This should include strengths and positive feedback as well as areas for development from our perspective. Always ask the candidate whether they have any feedback for us about the process.

2.4 PROCEDURES FOLLOWING INTERVIEW

The successful candidate is given a verbal conditional offer of the post, which is followed, immediately by a written conditional offer subject to:

- receipt of two satisfactory references (if they have not already been received)
- a satisfactory Enhanced DBS Disclosure (and barred list check where required)
- any outstanding qualification or identity checks
- any other appointment specific details

2.4.1 Reference Checks

The administration team verifies both references by contacting the referee in person via the telephone. Verification with the referee will check any information that is unclear or is vague within the application form, as well ensuring that the referee did personally write the reference. They are offered the opportunity to add any additional verbal comments to the written reference. Wherever possible, the referee should be asked if they believe the candidate 'has integrity, good character and is suitable for working with children'.

In circumstances where the reference is provided by an employer that involves working with children or vulnerable adults, the referee is asked to verify the following for the candidate via a direct telephone conversation:

- that they have integrity and good character
- their suitability for working with children and any concerns that have arisen.
- the dates of employment and the reason for leaving the role

Additionally, a Director/Operational Director is required to verify that the referee did personally write the reference and check if there is any additional information the referee would like to add. They must also confirm that the reference is accurate in respect of any disciplinary investigations. If there are any discrepancies between the reference provided and application form

this must also be checked verbally, as well as any vague areas that require additional information.

The Director/Operational Director will maintain written evidence of this reference check using a Reference Verification Form.

Any previous employment of a candidate that has involved working with children or vulnerable young adults will require direct contact from CFCC to verify identity and establish the integrity and suitability of the candidate, asking if they are of 'good character and are suited to working with children'. The Operational Director will contact each employer to verify the dates of employment are correct and the reason why the employment ended. It is important to ensure 'verification so far as reasonably practicable', if it is not possible to establish contact this must be recorded to show CFCC made sufficient attempts (e.g. the previous employer may no longer be in business).

If a candidate is not currently working with children, a reference must be sought from the relevant employer from the last time the applicant worked with children.

Any gaps in employment are fully explored and clarified by the Operational Director, these will be checked through the interview process.

2.4.2 Identity, Qualification and Professional Status Checks

DBS checks: For roles involving regulated activity with children, CFCC will obtain an Enhanced DBS check with Children's Barred List information where the role is legally eligible. CFCC will assess the duties of each role against current DBS eligibility guidance and will not request a level of DBS check for which the role is not legally eligible. Where a role does not meet the criteria for an Enhanced DBS check, the appropriate lawful level of check will be considered.

Identity: The identity of every successful candidate will be verified using the current DBS identity-checking requirements and appropriate original or permitted digital documentation. Any discrepancy in identity, name history or address history will be resolved before appointment.

Qualifications and experience: Professional and academic qualifications relevant to the post will be verified before commencement. For teaching, tutoring, mentoring, therapeutic, vocational or specialist roles, CFCC will verify that the candidate has the qualifications, training and/or relevant experience stated in the person specification.

QTS and teacher status: Qualified Teacher Status (QTS) is not a legal requirement for teaching staff working in non-school alternative provision. CFCC may therefore appoint appropriately qualified and experienced staff who do not hold QTS. Where QTS, QTLS, EYTS or another professional teaching status is claimed or is specified as a requirement of the post, CFCC will verify the status using the Department for Education Teaching Regulation Agency "Check a teacher's record" service and retain evidence of the check. The check will also be used, where applicable, to identify teaching prohibitions, restrictions or relevant sanctions.

Right to work: A statutory right-to-work check will be completed before employment commences in accordance with current Home Office requirements. Follow-up checks will be diarised where the individual has time-limited permission to work in the UK.

Overseas history: Where an applicant has lived or worked overseas, CFCC will obtain any appropriate further checks and evidence that are reasonably available and relevant to safeguarding. A DBS check does not by itself provide a complete overseas criminal-record history.

Medical fitness: Where appropriate and lawful, CFCC will verify that the successful candidate is medically fit to undertake the duties of the post, taking account of the Equality Act 2010 and reasonable adjustments.

Commencement: Only when all relevant pre-employment checks have been completed and recorded will an employee, contractor or volunteer be permitted to commence work with young people, unless a specific exception is permitted by law and has been formally risk assessed and authorised by a Director.

2.4.3 Teacher Prohibition Orders and Teaching Restrictions

Before appointment to any role involving teaching work, CFCC will check the candidate's teacher record, where applicable, to confirm that the individual is not prohibited or restricted from teaching in England. No person subject to a prohibition order or other restriction that prevents the duties of the post will be appointed to teaching work. This check is separate from the DBS check and, where applicable, the Section 128 check.

2.4.4 Section 128 Checks

CFCC will undertake Section 128 checks for candidates being appointed to management, leadership, governance or other roles to which a Section 128 direction is relevant. As a non-school alternative provision provider, CFCC adopts the DfE voluntary national standards and will use the Section 128 check as an additional safeguarding and suitability measure. A person subject to a Section 128 direction will not be appointed to a role where the direction prevents them from undertaking that role. The date, outcome and person responsible for the check will be recorded on the Single Central Record.

2.5 SINGLE CENTRAL RECORD

The Single Central Record (SCR) is maintained in line with the current KCSIE requirements applicable to CFCC and the recruitment checks CFCC has adopted for non-school alternative provision. Our SCR is currently kept at our head office and overseen by our Operational Director.

The SCR will record, as applicable to the role: identity checks; Enhanced DBS and Children's Barred List checks; further checks where a person has lived or worked overseas; right-to-work checks; verification of professional qualifications; teacher prohibition/status checks; Section 128 checks and the date each check was completed. The SCR may also record other safeguarding or suitability checks required by CFCC or a commissioner.

Recruitment records will be retained securely and access restricted to those with a legitimate safeguarding or employment need.

3 USE OF AGENCY STAFF

It is our preference not to use agency staff unless it is absolutely necessary and cannot be avoided in order to maintain staffing levels and the safe operation of CFCC.

Where agency staff are used the agency will:

- provide written confirmation that it has completed all the appropriate checks on

staff it supplies in compliance with DfE guidance, and that those are satisfactory.

- ensure that there is open communication and disclosure of any issue about previous conduct of any offered agency worker that is related to safeguarding. If this is not possible then the agency will be informed that such agency workers cannot work with CFCC.

Where agency staff are used, CFCC will obtain evidence that the checks relate to the named individual supplied to CFCC and not merely a general assurance that the agency checks its staff. Agency staff will not commence work until CFCC has received and verified the required evidence.

4 POLICY STATEMENT ON THE SECURE STORAGE, HANDLING, USE, RETENTION AND DISPOSAL OF DISCLOSURES AND DISCLOSURE INFORMATION

4.1 GENERAL PRINCIPLES

As an organisation using the Disclosure and Barring Service to help assess the suitability of applicants for positions of trust, CFCC complies fully with the DBS Code of Practice regarding the correct handling, use, storage, retention and disposal of Disclosures and Disclosure information. It also complies fully with its obligations under the Data Protection Act and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of Disclosure information and has a written policy on these matters, which is available to those who wish to see it on request.

4.2 STORAGE AND ACCESS

Disclosure information should be kept securely, in lockable, non-portable, storage containers with access strictly controlled and limited to those who are entitled to see it as part of their duties. In the case of CFCC those people with access to this information are the Directors and Operational Director.

4.3 HANDLING

In accordance with Section 124 of the Police Act 1997, Disclosure information is only passed on to those who are authorised to receive it in the course of their duties. We maintain a record of all those to whom Disclosures or Disclosure information has been revealed and it is a **criminal offence** to pass this information to anyone who is not entitled to receive it.

4.4 USAGE

Disclosure information is only used for the specific purpose for which it was requested and for which the applicant's full consent has been given.

4.5 RETENTION

Following a recruitment or relevant decision, we adhere to retaining Disclosure information and supporting documentation only for the necessary duration. The retention period may vary based on individual circumstances. Any information obtained through the counter signatory process is retained until the Disclosure Copy is received. This practice allows for addressing disputes, complaints, or any additional validation required. The Disclosure Copy will be held while the staff are employed by Castle Farm or until a new one is issued. Throughout this period, stringent conditions for safe storage and controlled access will be maintained.

4.6 DISPOSAL

Once the retention period has elapsed, we will ensure that any Disclosure information is immediately destroyed by secure means, i.e. by shredding, pulping or burning. While awaiting destruction, Disclosure information will not be kept in any insecure receptacle (e.g. waste bin or confidential waste sack). We will not keep any photocopy or other image of the Disclosure or any copy or representation of the contents of a Disclosure. However, notwithstanding the above, we may keep a record of the date of issue of a Disclosure, the name of the subject, the type of Disclosure requested, the position for which the Disclosure was requested, the unique reference number of the Disclosure and the details of the recruitment decision taken.