

Safeguarding: Safer Recruitment Policy and Procedures

Contact names	
Principals	Westminster: Justine Oliver Hampstead: Shirley Harwood Kensington: Siobhan McGrath (also Executive Principal)
SCR Champion/HR Officer	Saima Mirza
Safer Recruitment Trained	Kevin Green (Director of Finance and Operations) - Central Jonathan Ridgeway (Facilities Manager) - Central Jon Coward - Kensington Lina Lok - Central Michele Key - Central Helen Watson - Kensington Suza Johnston - Westminster Stuart Bain - Hampstead Ana de Castro - Westminster
Cognita Assistant Director of Education	Hampstead: James Carroll Kensington: James Carroll Westminster: Danuta Tomasz
Independent Chair of Safeguarding Governance Committee (SGC)	Hampstead: Lisa Laws Kensington: Lisa Laws Westminster: Lisa Laws
Cognita	Human Resources Director, UK Cognita, 5 & 7 Diamond Court, Opal Drive, Eastlake Park, Fox Milne, Milton Keynes, MK15 0DU Telephone: 01908 396 250

KEY FACTS: There are seven steps to safer recruitment;

1. Safer Recruitment Training

- a. NSPCC Safer Recruitment e-learning Online Portal *(to provide the interviewer with the context and knowledge to explore their safeguarding responsibility)*
- b. Face-to-Face Safer Recruitment Training delivered by Cognita Accredited Safer Recruitment Trainers

2. Job Descriptions and Advertisements

- a. Safeguarding commitment statement to be included in both Job Description and Job Advertisement *(to deter unsuitable personnel)*

3. Scrutinising, Shortlisting and Interviewing

- a. Application form *(to be used as main tool for scrutinising)*
- b. Internet search *(to gather any public domain information)*
- c. Gaps in employment history *(to be noted for further exploration)*
- d. Taking up references *(to verify previous experience)*
- e. Concerns from a reference *(to be noted for further exploration)*
- f. Invitation to Interview *(to prepare candidates for interview)*
- g. Preparing for the interview (selection process and interview panel)
- h. Verify Identity
- i. Verify Professional Qualifications
- j. Interview *(Scope of Interview, Outcome and Regrets)*

4. Offer letter and Contract of Employment *(specific reference is made to professional expectations to safeguard the company)*

- a. Terms and Conditions of Employment
- b. Probation
- c. Rehabilitation of Offenders (UK only)
- d. Disciplinary and Performance Improvement Procedure
- e. Standards and Policies:-
 - o Ofsted Framework (England only)
 - o Welsh Government Guidance (revised) Professional Standards for Education Practitioners in Wales 020/2011
- f. Safeguarding Declaration

5. Background Checks *(in addition to pre-interview checks, the following ensure the person is who they state they are and complies with our safeguarding requirements)*

- a. References
- b. Identity check
- c. Right to Work
- d. Enhanced Disclosure and Barred List Check
- e. Overseas criminal records checks (if applicable)
- f. Country of Origin check (if applicable)
- g. Disqualification by Association check (if applicable)
- h. Prohibition from Teaching check (if applicable)
- i. Prohibition from Management check (if applicable)
- j. Medical fitness

6. Recording and Monitoring New Starters *(to evidence all background checks have been completed and suitably returned)*

- a. SCR – updated for all new starters
- b. New Starter Checklist *(to be completed and filed on personnel file)*
- c. Risk Assessment Form *(to be completed and filed on personnel file)*
- d. Annual Staff Declaration *(Safeguarding and Compliance Record)*
- e. Change of Employment

1 Purpose

- 1.1 The Safer Recruitment Policy explicitly details Cognita's position, standards and expectations associated with its commitment to safeguarding and promoting the welfare of children and expects all staff to share this commitment, wherever they work and in whatever role.
- 1.2 Cognita follows the UK Guidance on Safeguarding Children and Safer Recruitment in Education (2006), its replacement Keeping Children Safe in Education (September 2016), Disqualification under the Childcare Act 2006, the Independent Schools Inspectorate Handbook for the Inspection of Schools (2015), the Hugh Davies QC; Southbank International School Recommendations (2014) and the Group benchmark of best practice for all its schools globally. In addition, for those schools within Wales, Cognita takes into consideration Keeping Learners Safe WAGC 158/2015.

2 Applicability

- 2.1 The following policy and procedure must be used for the recruitment and selection of all staff throughout the Cognita UK Group of Schools.

3 Definitions and Scope

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

4 Policy

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

- 4.3 Cognita continually implements strategies to ensure the best people are employed. The [Seven Steps to Safer Recruitment](#) have been created to deter and prevent unsuitable personnel from applying and/or being recruited.
- 4.4 In order to achieve the aim, it requires the recruiting team to adhere to the [Seven Steps to Safer Recruitment](#).
- 4.5 Due to the reliance on the recruiting team taking personal accountability, disciplinary action will be taken, which may include termination of employment, against any employee, who is found to have breached this policy.
- 4.6 When implementing Cognita's Safer Recruitment policy the Recruiting Manager and schools will be mindful of and act in accordance with the school's Prevention of Radicalisation Policy. By complying with safer recruitment best practice techniques as set out in this policy and by ensuring that there is an on-going culture of vigilance within our schools we aim to promote a culture of tolerance and respect and minimise the risk of students and/or members of staff being drawn into terrorism.

Equal Opportunities

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

Levels of Responsibility

- 4.10 It is the Recruiting Manager's responsibility to identify a vacancy, seek budgetary authority for the position and to produce a Job Description for the role.
- 4.11 There are a number of recruitment related activities which require personnel to sign the relevant JD Addendum which clearly articulates the role and responsibility for which they are accountable.
- 4.12 The [Staff Requisition Form](#) or [Leavers Replacement Form](#) (if appropriate) must be approved prior to any recruitment activity including advertising, engaging with external agencies, interviewing or making verbal or written job offers. This is to ensure the new position and recruitment costs are within the approved budget.
- 4.13 The HR Department provides a [Recruitment Toolkit](#) to assist with the process.
- 4.14 Applicants or colleagues should never be informed of the outcome of the recruitment process until it has been completed.

Professional Standards

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

5 Related Policies, Guidelines, Templates and Forms

- Equal Opportunities Policy
- Preventing Radicalisation and Extremism Policy
- Recruitment Toolkit
- Safeguarding: Child Protection Policy
- Staff Code of Conduct Policy
- Whistleblowing Policy

6 Procedure

(STEP 1) SAFER RECRUITMENT TRAINING

- 6.1 All members of the Recruitment Community must have successfully completed Safer Recruitment Training and have obtained the certificate in Safer Recruitment.
- 6.2 We believe training further strengthens and safeguards children in schools by helping to deter and prevent abuse; as such this is also a mandatory requirement for all Cognita employees who have a lead role in the safeguarding/child protection of students in a school.
- 6.3 The online training is currently available from the NSPCC eLearning Portal (content formally managed by the UK Department for Education) via;
<http://www.nspcc.org.uk/what-you-can-do/get-expert-training/safer-recruitment-education-course/>
- 6.4 In addition face-to-face Safer Recruitment Training is also available from Cognita Accredited Safer Recruitment Trainers. Where your local authority provides face-to-face Safer Recruitment Training this can also be used but on completion of the training a copy of the certificate needs to be sent the HR Department - Learning & Development Team at the Regional Office in Milton Keynes.

(STEP 2A) JOB DESCRIPTIONS

- 6.5 Job Descriptions, including the Person Specification should be reviewed for each new vacancy and must include the main duties and responsibilities specific to the needs of the role. It must also include a statement about the individual's responsibility for promoting and safeguarding the welfare of children s/he is responsible for, or comes into contact with, as below:

"The job holder's responsibility for promoting and safeguarding the welfare of children and young person's for whom s/he is responsible, or with whom s/he comes into contact will be to adhere to and ensure compliance with the relevant

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Cognita Safeguarding; Child Protection Policy and Procedures at all times. If in the course of carrying out the duties of the role, the job holder identifies any instance that a child is suffering or likely to suffer significant harm either at school or at home, s/he must report any concerns to the School's Child Protection Officer/Designated Safeguarding Lead or to the Head or indeed to the Regional CEO so that a referral can be made accordingly to the relevant third party services."

(STEP 2B) ADVERTISEMENTS

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

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

(STEP 3) SCRUTINISING, SHORTLISTING AND INTERVIEWING

A. The Application Form

- 6.9 Applicants, both internal and external, must use Cognita's [Application Form](#) to apply for a vacancy in order to comply with the Safer Recruitment Policy. This ensures a common set of core data from all applicants is received. It is not good practice to accept a CV drawn up by the applicant in place of an Application Form because this will only contain the information they wish to present and may omit relevant details (however, CV's can be accepted in addition to an Application Form if the applicant feels it better illustrates their knowledge, skill and experience).
- 6.10 It is unacceptable for an applicant to be appointed in the absence of a fully completed signed Application Form. When an Application Form has been submitted electronically with only a typed name in the signature box, an applicant invited to attend an interview should be asked to sign the Application Form as part of the background compliance checks undertaken on the interview day or their first day of employment.
- 6.11 Application Forms within Wales must include a self-declaration by the applicant that they are not barred, disqualified from teaching or subject to sanctions where applicable.
- 6.12 It is strongly advised that two people shortlist applicants to avoid bias of opinion or prejudice in the process.

B. Internet Search

- 6.13 Applicants should be subject to a basic internet/media search to help identify the applicants' online identity and determine whether there may be any reputational risk to the school/Cognita based on comments made by or about them online. Any information requiring further consideration should be discussed with the applicant and noted on the summary report from the interview documenting the considerations made. Information relating to the personal protected characteristics of the applicant (e.g. their race or sexual orientation) will not be taken into account in considering their application.
- 6.14 Searches should cover all countries where the applicant has lived and/or worked to ensure a full picture of their past is captured.

C. Gaps in Employment History

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

D. Taking up References

- 6.16 Applicants should give a minimum of three professional reference contacts on the Application Form. A key purpose of the reference is to verify the applicant's suitability to work with children. These reference contacts must therefore include the most recent employer, the most recent employment working with children (if different) and cover a minimum of 5 years work history. References should be sought on all short-listed applicants, including internal ones.
- 6.17 The School must request all three written references directly from the referee. Cognita does not accept an open reference as part of the recruitment process e.g. "to whom it may concern". A minimum of two returned references are required on each personnel file.
- 6.18 As a rule, character references are not acceptable; this includes references from relatives or people writing solely in the capacity of friends. If there is a good reason the applicant cannot supply the requisite number of referees (e.g. because they are recent graduates or have only held a small number of jobs), references may be sought from high quality alternatives (e.g. University tutor).
- 6.19 References should be requested using the [Employer Reference Request Form](#) and the [Reference Request Letter](#).

Teaching staff:

- 6.20 Prior to the interview, all permissible references must be requested for shortlisted applicants, taking into account whether the applicant has requested their current employer should not be contacted at this stage.

- 6.21 Best endeavours must be made to obtain and scrutinise a minimum of two references before the interview, and applicants must not be interviewed without at least one reference being returned.
- 6.22 All job offers are conditional upon receipt of satisfactory references and any appointment must not be confirmed until all required references, which must include either the current or most recent employer, have been received.

Non-teaching staff:

- 6.23 Prior to the interview, at least one written reference must be taken up on shortlisted applicants. This does not have to include the current or most recent employer at this stage, the Application Form asks if the referee can be contacted prior to interview for this reason.
- 6.24 Once the successful applicant has been offered the role, the second and third references must then be requested, including from the current or most recent employer if this was not obtained before the interview, in order to complete the reference process.
- 6.25 All job offers are conditional upon receipt of satisfactory references

E. Concerns from a Reference

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

F. Invitation to Interview

- 6.29 The [Invite to Interview Letter](#) should include; the date, time and place of the interview, directions to the venue, names of those people on the interview panel, details of the selection process, the full length Safeguarding Commitment statement and a statement that the interview will include questions relating to safeguarding.
- 6.30 Applicants should be asked to bring three original documents:
 - two confirming their identity i.e. a current driving licence, passport and/or birth certificate (one of which must include their photograph)

- plus one document confirming their current name and address such as a utility bill or financial statement (dated within the last three months). It is not permissible for applicants to offer photocopied documents for the purposes of identity checking

G. Preparing for the Interview (Selection Process and Interview Panel)

Selection Process:

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

Interview Panel

- 6.33** It is recommended, but not mandatory to have a minimum of two interviewers, and in some cases, i.e. for senior or specialist roles, a larger panel might be appropriate. A recruitment panel allows for at least one member to observe and assess the applicant, and the other to make notes. It also allows for the corroboration of events within an interview should an applicant attempt to bring a claim for an alleged breach of process or legislation within the recruitment process. A manager who interviews alone does not have such a defence.
- 6.34** The members of the interview panel should meet before the interview to:
- Agree and understand the required standard for the role to which they are appointing
 - Consider the issues to be explored with each applicant and who on the panel will ask about each of those
 - Agree the assessment criteria in accordance with the Job Description and Person Specification
 - Review the [Interview Template](#) to select the relevant questions for the post, ensuring Safeguarding questions are a focus
- 6.35** The Recruiting Manager should also consult others involved in the selection process, such as teachers involved in the lesson observation, tours or informal meetings to obtain their feedback, and collate and assess any associated paperwork. These should be incorporated into the summary or interview record documentation as required.

H. Verify Identity

- 6.36 When verifying identity, those responsible are aiming to corroborate the person's full name, including forenames and last name, date of birth, and full permanent address. Where necessary applicants should also provide any official documentation regarding name changes.
- 6.37 Identity verification within our Welsh schools also includes the requirement to obtain details of the applicants National Insurance Number.
- 6.38 Where an applicant claims to have changed his or her name by deed poll or any other mechanism (e.g. marriage, adoption, statutory declaration) he or she is required to provide documentary evidence of the change.
- 6.39 A copy of the documents used to verify the successful applicant's identity and address must be kept on their personnel file for record-keeping purposes and the person verifying the documents must sign and date the copies.

I. Verify Professional Qualifications

- 6.40 Applicants must also be asked for evidence of their educational or professional qualifications that are necessary or relevant for the role (i.e. the original or certified copy of a certificate, or diploma, or a letter of confirmation from the awarding body). If the applicant cannot produce original documents or certified copies, written confirmation of his or her relevant qualifications must be obtained from the awarding body (for teaching positions) prior to the appointment being confirmed.
- 6.41 A copy of the qualifications must be kept on the personnel file and the person verifying the documents must sign and date the copies.

J. Interview (Scope of Interview, Outcome and Regrets)

- 6.42 The interview should assess the merits of each applicant against the role requirements. It is important to ensure that the interview process adopted for internal applicants is exactly the same as that for external applicants for the same role. It is also very important to explore each applicant's suitability to work with children.
- 6.43 Each applicant must be given a fair and equal opportunity to demonstrate that they have the skills, experience and personal attributes that are being sought. The selection process should reflect the requirements of the role, the necessary competencies to be successful in the role, and the personal qualities appropriate to the environment.
- 6.44 All applicants should be tested in the same areas, and should convincingly reach the level that was expected at the outset. An applicant should not be recruited based on being the 'best of the group', they should be the best person for the role. This may require commencing the search again if a suitable applicant is not sourced from the original search.
- 6.45 Having agreed the interview questions the panel will explore any issues with each applicant, based on the information provided in the Application Form and references received. An applicant's response to a question will determine whether and how that is followed up.

- 6.46 It is better to ask behavioural based questions which ask an applicant to relate how s/he has responded to or dealt with an actual situation in the past, or questions that test an applicant's attributes and understanding of key issues.
- 6.47 Interview notes should be taken by all panel members and collated at the end of the interview by the Recruiting Manager. Interview notes should be legible and cover all key topics discussed during the interview. At the very least the Recruiting Manager should prepare a legible or typed summary of the interview covering the points listed in section 6.46. Furthermore the Recruiting Manager should make summary comments as the responsible person.
- 6.48 The Recruiting Manager should ensure the interview notes are securely retained for a maximum of six months and then if the applicant is not successful they may be shredded. It is important that interview notes are retained for this period of time as they will provide justification in the event of a potential complaint about the selection process.
- 6.49 Interview notes for the successful applicant should be retained securely on their personnel file for record-keeping purposes for the duration of their employment and any required statutory period of time thereafter.
- 6.50 Please note, for Head recruitment, all interview notes must be collated by the Recruiting Manager and passed to the HR Department for secure and confidential filing.

Scope of the Interview

- 6.51 In addition to assessing and evaluating the applicant's suitability for a particular role, it is imperative that safeguarding questions are asked at interview to ensure the filtering process of unsuitable applicants, but also to gain an insight in to the knowledge, experience and attitude of the applicant towards safeguarding, as this information can facilitate early training requirements upon commencement of role.
- 6.52 The interview panel should also therefore explore:
- The applicant's attitude towards children and young people
 - His or her ability to support the School's policy for safeguarding and promoting the welfare of children
 - Gaps in the applicants' employment history
 - Periods of time spent overseas
 - Concerns or discrepancies arising from the information provided by the applicant and/or a referee
- 6.53 All applicants invited to interview are entitled to a meaningful interview irrespective of any change in circumstances (e.g. change of budget; identification of a preferred applicant; answers to early questions are poor) which might tempt the Recruiting Panel to abbreviate the process. This maintains a professional image of the school, of Cognita and will to some extent protect from potential claims of an unfair process.

The Outcome:

- 6.54 The recruitment decision should be based purely on the criteria required, so any outcome can be explained constructively to the unsuccessful applicants. Any feedback that can help them should be given honestly and, for internal applicants,

learning and development areas may be identified. The HR Department can assist with ensuring this feedback is constructive.

Regrets:

- 6.55 Unsuccessful applicants should never hear the result from a third party, so it is essential that the successful applicant is either told after the regrets or in confidence until all the outcomes are known. It is the Recruiting Manager's responsibility to ensure that this process is controlled effectively.

(STEP 4) OFFER LETTER AND CONTRACT OF EMPLOYMENT

- 6.56 There are a number of references/clauses in the offer letter and contract of employment which enable the management of a new employee's suitability to work with children.

"Any offer of appointment made to a successful applicant, including one who has lived or worked abroad, must be conditional on satisfactory completion of the necessary pre-employment checks. Where an enhanced DBS certificate is required, it must be obtained from the applicant before or as soon as practicable after the person's appointment. All other pre-employment checks must have been completed, including where the individual is in regulated activity, a Barred List check. Where a school allows an individual to start work in regulated activity, before the DBS certificate is available, they should ensure the individual is appropriately supervised." KCSIE 2016.

A. Terms and Conditions of Employment

- 6.57 The [Template Offer Letter](#) and [Contract of Employment](#) must be used in order to satisfy the conditions of employment relating to safeguarding.

B. Probation

- 6.58 The initial period of employment enables an observed judgement of an applicant's suitability to work with children. Please go to [\(STEP 7\) PROBATIONARY PERIOD INCLUDING INDUCTION](#) for more information.

C. Rehabilitation of Offenders

All applicants are required to give full details of convictions and cautions, including those which would otherwise be considered "spent" by virtue of the said Act.

D. Standards and Policies

- 6.59 Teaching staff are expected to conduct themselves in line with the following:-
- the DfE professional standards in England
 - the Welsh Government Guidance (revised) Professional Standards for Education Practitioners in Wales 020/2011

E. Safeguarding Declaration

All applicants will be required to sign a Safeguarding Declaration within the Contract of Employment to evidence their commitment.

(STEP 5) BACKGROUND CHECKS

- 6.60 An offer of employment must be conditional upon:
- The receipt of **at least two** satisfactory written references
 - Verification of the applicant's identity (if that could not be verified at the interview)
 - Right to work
 - An Enhanced Disclosure and Barring Service (DBS) check, (paper copy) must be shown to the ID checker by the applicant before starting work. An Enhanced DBS with Barred List check is required for people working in Regulated Activity and this is the default set up for Cognita's online application service with Capita.
 - The receipt of overseas criminal records checks for all other countries in which the applicant has lived or worked (for 3 months or more in any one country since the age of 16 years) (if applicable)
 - Country of Origin check (if applicable)
 - Childcare Disqualification (including by Association) declaration (if applicable)
 - Prohibition from Teaching check (if applicable)
 - Check for prohibition from teaching sanctions (since 18 January 2016) in other EEA member states by an EEA member state regulator of the teaching profession (if applicable)
 - Prohibition from Management check (if applicable)
 - Verification of the applicant's medical fitness
 - Verification of appropriate qualifications/professional status (where required)
 - Satisfactory completion of the probationary period
- 6.61 All checks should be recorded in writing, verified (date and signature) documented and retained on the employee's personnel file. A summary of the checks must be recorded on the [Single Central Record \(SCR\)](#).
- 6.62 The above checks must be completed **before** an applicant takes up the post, this may result in delaying the commencement of employment.
- 6.63 Any exceptions to this must have been discussed within a conference call involving the Head, HRBP and ADE following which the ADE confirms their agreement that it is necessary for the individual to start work before all the vetting checks are complete and that the proposed measures that will be taken are appropriate to safeguard students' welfare.
- 6.64 Any exceptional permission to appoint without all recruitment vetting checks completed will be subject to the following conditions:
- All vetting checks **must** have been applied for
 - A Barred List check **must** have been completed and confirmation obtained that the individual is not on the Barred List
 - A Prohibition from Teaching Check **must** have been completed (if applicable)
 - A Prohibition from Management Check **must** have been completed (if applicable)
 - At least one written reference **must** have been received, and the Recruiting Manager must have spoken personally over the telephone (or face to face) with the remaining referee(s), asked and obtained answers to all of the questions on the reference request form, and a full written note must have been taken of these discussions and placed on the personnel file

- Verification of the individual's identity, right to work in the UK, qualifications and medical fitness **must** have been completed
- A written Risk Assessment **must** be carried out using the standard **Risk Assessment Form** and this must be suitably approved then placed on the personnel file
- Steps must be taken to ensure mitigating arrangements, which will include appropriate supervision and restrictions on certain types of activity (such as school trips), are put in place pending completion of the vetting checks and documented on the **Risk Assessment Form**, which must be reviewed every two weeks, and updated notes produced as an audit trail
- Details of supervisory measures and restrictions on work **must** be discussed and agreed with the new employee prior to them starting.
- If the missing check is the DBS and there is no portable DBS available from working in an educational establishment immediately prior to their appointment at the school, then a note that there is a risk assessment in place should be recorded on the **Single Central Record (SCR)**

6.65 If any of the information contained in the pre-employment checks is unsatisfactory or has discrepancies, this should be followed up by the Recruiting Manager supported by a member of the HR Department. Any disclosure information relating to a conviction should be notified to the ADE for careful consideration of suitability to the post. Serious, deliberate fraud or deception in connection with an application for employment may amount to a criminal offence. In such cases the employer should, in addition to any planned disciplinary action, consider reporting the matter to the relevant authorities and/or regulators. The Regional CEO will be notified of any reporting to relevant authorities and/or regulators.

6.66 To assist you keeping track of this process, please use the **New Starter Checklist**.

A. References

6.67 Previously detailed in Sections 6.15 – 6.27 inclusive.

B. Verifying Identity

6.68 Previously detailed in Sections 6.37 to 6.40 inclusive.

C. Right to Work

6.69 When appointing new staff the person's right to work in the UK must be verified, advice can be sought on <https://www.gov.uk/check-job-applicant-right-to-work> Copies of documents should be verified (date and signature) and retained on the personnel file.

D. Enhanced Disclosure and Barring (DBS) check including the Barred List

6.70 UK DfE regulations for schools set out a statutory duty to obtain an Enhanced DBS, which must include Barred List information for newly appointed staff in regulated activity i.e. all permanent, fixed-term contracts and temporary staff (including bank supply staff) employed by the school/Cognita **before** they commence employment. Where the post holder will not undertake regulated activity, an Enhanced DBS must be carried out (again, **before** they commence employment), but schools are not permitted to carry out a Barred List Check on those not undertaking regulated activity.

- 6.71** The full legal definition of regulated activity is set out in Schedule 4 of the Safeguarding Vulnerable Groups Act 2006 as amended by the Protection of Freedoms Act 2012:
- 6.72** Regulated Activity includes:
- a) teaching, training, instructing, caring for or supervising children if the person is unsupervised or providing advice or guidance on wellbeing, or driving a vehicle only for children, or engaged in overnight activity, even if this happens only once.
 - b) work for a limited range of establishments (known as “specified places” which includes schools and colleges) with the opportunity for contact with children, but not including work done by supervised volunteers.
- Work under (a) or (b) is regulated activity only if done regularly. Some activities are always regulated activities, regardless of their frequency or whether they are supervised or not. This includes:
- c) relevant personal care, or health care provided by or provided under the supervision of a health care professional:
 - Personal care includes helping a child, for reasons of age, illness or disability, with eating or drinking or in connection with toileting, washing, bathing or dressing.
- 6.73** Regularly is once a week, on four or more days in a 30-day period or overnight. As a general rule, it is likely that all school personnel will be carrying out regulated activity, and so will require a Barred List check with their enhanced DBS check. However, in order to assess whether a particular role involves regulated activity, please consult the Keeping Children Safe in Education (September 2016) guidance or refer to the Recruitment Partner at Cognita c/o the HR Department.
- 6.74** The relevant DBS check must be carried out as a matter of priority for all new employees at the job offer stage via the online system. If the offer is made more than three months before the employment will commence, it is best practice to wait until three months before the commencement date before applying for the DBS check.
- 6.75** In addition, where an applicant is found to be on the Barred List, or the DBS Disclosure shows s/he has been disqualified from working with children by a court; or an applicant has provided false information in, or in support of, his or her application; or there are serious concerns about an applicant’s suitability to work with children, the facts must be reported to the Police, the DBS and:
- If the individual is a teacher in England, the DfE Children’s Safeguarding Operations Unit (formerly the Teachers Misconduct Team) must be informed
 - If they are a teacher in Wales the General Teaching Council of Wales must be informed.
- 6.76** All steps taken in following up such issues must be clearly documented and retained on the recruitment file.

- 6.77 The school is able to undertake a free, online status check as an alternative to making a full new DBS check if the applicant has subscribed to the “Update Service” and gives written permission to the school to do so. By using this service the school is able to check if any new information has come to light since the DBS certificate was originally issued. However, if the check does declare that something has changed the school will need to seek a new disclosure in order to use that information as evidence for a discussion with the applicant.
- 6.78 To carry out a status check of a DBS certificate, the school must:
- Have the applicant’s consent
 - Confirm that they are legally entitled to carry out the status check
 - See the original certificate to check it is the same type and level as they are legally entitled to apply for
 - Make sure that the right checks have been carried out and see what, if any, information was disclosed about the applicant
 - Check the person’s identity
 - Check the name on the DBS certificate matches this identity
 - Note the DBS certificate reference number, the person’s name and date of birth
- 6.79 If the successful applicant has not subscribed to the “Update Service” they should be instructed to log into the Capita online portal to commence their DBS check via; <https://disclosure.capitarvs.co.uk/cheqs/rbLogin.do>
- If the applicant did not provide appropriate identity documents on the interview day to meet the identity checking requirements for the DBS, then they will be required to bring their original (not copy) ID for checking to a school/Cognita verifier as part of the recruitment process. Copies of documents should be verified (date and signature), retained on the personnel file and recorded on the SCR.
- 6.80 If the position being offered also requires a Prohibition from Management check (see 6.101) it is important to advise the successful applicant of the need to include the words “Child Workforce Independent School” immediately after their job title within their application.
- 6.81 An Applicants' Guide can also be downloaded for further information via; <http://www.capitarvsclientzone.co.uk/e-bulk-guidance.aspx> .
- 6.82 Schools are required to update DBS checks (including Barred List checks if applicable to the role) for all staff, as from time to time determined by the Proprietor, or as soon as possible if concerns arise about an existing staff member's suitability to work with children. Additionally, staff are required to sign an annual self-declaration regarding their suitability to work with children.
- 6.83 Within our Welsh schools there is a requirement to undertake a new DBS should an employee be promoted to a position with significant greater responsibility for children and young people.
- 6.84 Please note that it is only permissible to keep a photocopy of a DBS and/or criminal/Police records for up to six months and for reasons of a formal recruitment query. A record of the check and confirmation that it was satisfactory will be recorded on the SCR, together with details of the certificate number.

E. Overseas Checks

- 6.85 It is also essential for staff that have lived and/or worked outside of the UK to undergo the same checks as all other applicants plus additional criminal/Police checks to account for their time overseas.
- 6.86 Criminal/Police records information must be sought for all other countries in which the applicant has lived and/or worked (for 3 months or more in any one country since the age of 16 years).
- 6.87 The standard for criminal/Police record checks vary, many countries will not offer such stringent checks as the UK. Nevertheless, criminal/Police checks should still be sought.
- 6.88 Where resources, such as Google translate, do not provide clarity for overseas checks, a reputable translation company should be used. Under no circumstances should a member of the school staff with the relevant language be asked to assist, unless they are a member of the Interview Panel and as such would reasonably be expected to have sight of such documents. Please contact a member of the HR Department for further support.
- 6.89 In the event that criminal/Police records are not available or forthcoming from the country from which you are requesting, certificates of good conduct (where available) together with full employment references may be an acceptable alternative from those countries. If no employment references are available consideration should be given to obtaining character references from individuals of good standing that knew the individual in the country. This should be recorded on a [Risk Assessment Form](#) and filed on the applicants personnel file for record-keeping purposes.
- 6.90 Any disclosures on overseas checks will need to be discussed with the ADE in order for an informed recruitment decision to be made.
- 6.91 UK Military Personnel:
- When British Forces personnel are serving at a base in another country, there is usually an agreement by which criminal offences committed on the base are dealt with under UK law and will appear on a DBS check. However, this agreement will not cover all offences committed off the base or involving nationals of the other country concerned.
 - Therefore, although a DBS check conducted on UK Service Personnel and their families should disclose convictions by them in the UK it may not capture all convictions overseas.
 - In addition to the appropriate DBS check, overseas criminal checks should also be requested for the relevant overseas jurisdictions where the individual has spent 3 months or more.
 - Copies of documents should be verified (date and signature), retained on the personnel file and recorded on the [SCR](#).

F. Country of Origin Check

- 6.92 Anyone born outside the UK (and who does not hold a British Passport) must provide either a copy of their birth certificate or a passport which shows their place of birth.

- 6.93 Copies of documents should be verified (date and signature), retained on the employee's personnel file and recorded on the [SCR](#).

G. Childcare Disqualification (including by Association)

- 6.94 Schools must ensure that they are not knowingly employing a person who is disqualified under the Childcare (Disqualification) Regulations 2009 in connection with relevant childcare provision.
- 6.95 Schools are responsible for ensuring that anyone who falls within the relevant categories of staff are made aware of the legislation including that they may be disqualified "by association" under regulation 9 of the 2009 Regulations where they live in the same household as a disqualified person or in a household in which a disqualified person is employed.
- 6.96 Therefore applicants applying to work in relevant childcare provision will be asked to complete a declaration confirming that they are not barred from providing childcare to children, including by association.
- 6.97 Whilst the Disqualification by Association check is not part of the guidance from the Welsh Assembly, Cognita require this check to be applied in the Welsh schools.
- 6.98 In line with Cognita Policy all staff who work at a school are required to sign an [Annual Staff Declaration](#) which ensures their knowledge and understanding of safeguarding related policy. For relevant categories of staff this Annual Staff Declaration will include a personal safeguarding declaration which verifies their continued right to be employed, i.e. that they continue not to be disqualified from providing childcare to children, including by association.
- 6.99 Copies of documents should be verified (date and signature), retained on the employee's personnel file and recorded on the [SCR](#).

H. Prohibition from Teaching Check

- 6.100 Anyone who is appointed to carry out teaching within England requires an additional check to ensure they are not prohibited from teaching.
- 6.101 Each School will need to register for Teacher Services provided by the NCTL by sending an email to: Employer.ACCESS@education.gsi.gov.uk with the following information:
- Name of the School
 - DfE number
 - Name and email address of the nominated person/s
- 6.102 The Teacher Services portal should be used to check successful applicants for any prohibitions by either entering their TRN number for an automatic search or alternatively manually checking all relevant lists for all known names.
- Prohibition lists are listed alphabetically by surname and can be found by clicking on the reference number adjacent to the name, this will then take you to more information about the sanctions that have been imposed.

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

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

6.104 Since 18th January 2016 it is also a requirement within England to check if any European Economic Area (EEA) teacher regulatory authority has imposed a restriction on a person's ability to work as a teacher. Any new sanctions must be shared with all other EEA Member States and schools in England can check for teachers sanction in other EEA member states online by using the Teacher Services - Employers portal.

- For teachers with a TRN number, this check will be included in the printed report outlined above
- For teachers without a TRN number, the appropriate list will need to be checked

6.105 Please note that although this check is not applicable for teachers who gained their qualification in Wales there is a requirement for schools in Wales to undertake a registration check. In order to do this they must send an email to registration@ewc.wales and ask the following questions:

- Whether an individual is registered, and
- Whether there are any suspensions or barrings placed upon them.

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

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

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

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

I. Prohibition from Management Check

- 6.107** All members of the proprietorial body (Cognita Schools Limited) and all staff with management responsibility who were recruited on or after 12th August 2016 must be checked to ensure that they are not subject to a direction under section 128 of the Education and Skills Act 2008 or section 167A of the Education Act 2002 prohibiting that individual from taking part in the management of independent educational institutions in England and/or Wales respectively.
- 6.108** For all those appointed to a teaching position with management responsibility the prohibition check should be done using both routes, via the DBS with Barred List check and also by checking the appropriate list through the NCTL Teacher Services portal in the same way as the Prohibition from Teaching check (see paragraphs 6.81, 6.103 and 6.104 above)
- 6.109** For those individuals in regulated activity, but who are not teaching, this check should be undertaken by requesting it with the DBS and Barred List check (see paragraph 6.81 above).
- 6.110** For those individuals who are not carrying out regulated activity but who nonetheless have management responsibility a prohibition from management check cannot be requested with the DBS as there is no right to request the Barred List check (which is a requirement to be able to use this route). Therefore the only route that can be used to undertake this check is via the NCTL Teacher Services portal in the same way as the prohibition from teaching check (see paragraph 6.103 above). Such a check can be made of any individual with management responsibility, irrespective of whether or not that individual is a teacher. For individuals who are based in or qualified in Wales a check should be made through NCTL and the EWC in accordance with paragraphs 6.103 and 6.106 respectively.

J Medical Fitness Check

- 6.111** At offer stage, a [Health Declaration Form](#) is required from each member of staff, duly signed, that they know of no reasons, on the grounds of mental or physical health why they should not be able to discharge their duties with respect to the job description and contract of employment.
- 6.112** Copies of [Health Declaration Forms](#) should be verified (date and signature), filed in a separate file (not on the personnel file) and recorded on the [SCR](#).

(STEP 6) RECORDING AND MONITORING NEW STARTERS

A. The Single Central Record (SCR)

- 6.113** Schools must keep a [Single Central Record \(SCR\)](#) to evidence they have carried out the range of checks required by law on their staff. All individuals who work in regular contact with children, including volunteers and those employed by third parties (including Teacher Trainees) must be included on the [SCR](#), along with details of all members of the Proprietor Body.
- 6.114** The [SCR](#) must contain the following fields:

- Full name of staff member
- Position and Start date
- Identity check
- Qualifications
- Enhanced DBS
- Barred List/List 99
- Right to Work in the UK
- Overseas checks
- References
- Application Form
- Prohibition from Teaching
- Prohibition from Management check (where appropriate)
- Childcare Disqualification (including by Association)
- Medical fitness declaration
- Notes

6.115 Best practice for all documents copied, dated and signed is to state they are "copy of original" so that there is no doubt on record. It also helps if the signature has the name printed underneath for future reference.

6.116 The checker must input the following on to the [SCR](#):

- the date the original documentation was seen
- their initials.
- the level of clearance as "satisfactory" if it complies with the requirement.
- the clearance level for Right to Work is "Yes"
- for most DBS entries the clearance level is "Enhanced with Barred List"
- where the Barred List check is obtained as part of the DBS check and not as a standalone, the clearance level should be the same as for the DBS
- where the Barred List check is obtained as a standalone check, the clearance level should be "Barred List clear"
- if there is no requirement to see documentation "N/A" must be entered as no field should be left blank.

6.117 If operating from a multi-site school and sharing staff all information listed above should be recorded on both schools' [SCRs](#).

6.118 Only one location, single registered school or Regional Office should be responsible for; holding the full personnel file of a staff member, obtaining the necessary documents and for undertaking any appropriate checks. They are then responsible for providing written confirmation of the checks to the other sites, together with any applicable risk assessments.

6.119 The Head at the second site is then responsible for reviewing the data and for documenting any site specific risk assessments on the basis of the information provided and their acceptance that all the necessary checks for the post within their school have been completed to their standard. Where necessary they should also undertake additional checks applicable to the arrangements at their school if the original risk assessment does not provide an appropriate mitigation for that site. If any additional check is required, the second school will complete the check and ask for the primary school to retain the information on file.

B. New Starter Checklist and Risk Assessment Form

- 6.120 The [New Starter Checklist](#) must be completed as an evidence tool that all necessary checks and returns have been received. This document is signed off by the Head and filed in the personnel file.
- 6.121 If any of the checks required are not fully compliant with the standard process this must be documented on a [Risk Assessment Form](#) whereby a discussion with the employee is recorded, the considerations noted, details of any mitigating actions are clearly defined and the outcome determined by the Head to enable a full audit trail.

C. Staff Annual Declaration

- 6.122 On an annual basis all staff will be required to complete the [Staff Annual Declaration](#) which ensures their knowledge and understanding of safeguarding related policy, procedure, key contacts in the school and (for all relevant staff) provides for a personal safeguarding declaration with regard to DBS and Childcare Disqualification (including by Association). The completed Declaration must be filed in the personnel file. Where an aspect of the annual declaration is not applicable to the role undertaken by the individual, then they should enter "N/A" against the relevant entry on the Declaration before signing and returning it.

D. Change of Employment

- 6.123 Where an employee's role changes, and the [Change of Employment Details Form](#) is used, the Recruiting Manager must give due consideration to the relevant checks now appropriate for the new role (i.e. has the existing member moved to a position involving regulated activity?).
- 6.124 Similarly if a member of staff moves from a position involving regulated activity into non-regulated activity only, ongoing relevant checks should be monitored and recorded.
- 6.125 In both cases the [SCR](#) should be updated accordingly.
- 6.126 All paperwork and checks associated with a change of employment must be filed in the personnel file.

(STEP 7) PROBATIONARY PERIOD INCLUDING INDUCTION

A. Induction

- 6.127 An induction programme should be made available to all new staff, regardless of role or previous experience. The purpose of the induction is to:
- Provide training and information about the School and Cognita's policies and procedures including the vision and values, objectives and ethos, with specific reference to safeguarding and promoting children's welfare, including child protection.
 - Support individuals in a way that is appropriate for the role to which they have been appointed;
 - Confirm the conduct that is expected of staff (Cognita's Code of Conduct including neutral notification)
 - Provide opportunities for new members of staff to discuss any issues/concerns about their role or responsibilities

- Enable the new member of staff's Line Manager to recognise any issues/concerns about the person's ability or suitability at the outset and address them immediately

- 6.128 The content and nature of the induction process will depend upon the role and previous experience of the new member of staff, but must include the information on the policies and procedures in relation to safeguarding and promoting the welfare of children eg:
 - (Education) Safeguarding; Child Protection Policy; which should also cover;
 - Safe practice and the standards of conduct and behaviour expected of staff and students in the School
 - How and with whom any concerns about those issues should be raised
 - (HR) Other relevant employment procedures which should include;
 - Disciplinary, performance improvement and whistleblowing procedures
 - Equal Opportunities Policy and the wider Employment Handbook

- 6.129 An [Induction Checklist](#) provides the means to document that safeguarding was covered in the first week of employment as a further demonstration of the school/Cognita's commitment to safeguarding our students. This [Induction Checklist](#) should be completed for each member of staff and filed in the personnel file.

- 6.130 The induction programme should also include Child Protection Training appropriate to the new member of staff's role to ensure their full understanding of their safeguarding responsibilities. In addition, this will help ensure they best understand the school/Cognita's commitment to safeguarding and promoting the welfare of children.

- 6.131 The new member of staff will be required to sign the [Staff Annual Declaration](#) upon joining the school and on an annual basis. A copy of the signed [Declaration](#) must be placed in the personnel file.

Probation

- 6.132 The initial period of any new role is inevitably a time of adjustment during which the new starter becomes acquainted with a new environment, different working practices, routines and standards of performance. This will take time and to enable both parties to realistically assess suitability for the role, as such all new starters employment is subject to a probationary period (the length is role dependant).

- 6.133 Performance will be monitored and discussed throughout this period including a formal review meeting to discuss how both parties feel about the role, school/department/Company and progress made in position and to ensure positive relationships with colleagues, students and parents have been made.

- 6.134 If the school/Company is not satisfied that the necessary level of performance has been reached during the probationary period and/or there are some other concerns, the probation may be extended. In some instances either party may decide to give notice to terminate employment (which is usually a shorter period during this time).

- 6.135 A new member of staff whose role places them in the Recruitment Community must undertake [Safer Recruitment Training](#) during their Probation Period.
- 6.136 The probation period is also a significant period during which the new starter's attitude to safeguarding should be assessed. No appointment should be confirmed until the Line Manager is satisfied that the new starter fully understands and embraces the school's safeguarding philosophy and understands their own personal accountability.
- 6.137 The [Probation Review Form](#) should be used to document the discussion and conclude the probationary period. No confirmation of successful completion of the probationary period should be issued if there is still an outstanding check required.

Notification Responsibilities

- 6.138 If any information regarding an applicant comes to light through the recruitment and selection process, to suggest that they may have harmed or pose a risk of harm to a child or vulnerable adult the matter should be discussed with the HRBP immediately to ensure we meet our legal duty to refer a 'cause for concern' of this nature to the relevant third parties.
- 6.139 This obligation regarding the legal duty to refer a "cause for concern" extends beyond the recruitment and selection process and applies to any volunteers, trainee teachers, supply staff, those on fixed term contracts, resignations, voluntary withdrawal and all contract workers. All such instances will be disclosed to the Independent Chair so that the Proprietor exercises their duty appropriately. In addition, all such instances will be disclosed to any external inspector as required.
- 6.140 We also follow the Teacher Misconduct: The Prohibition of Teachers (July 2014) where referral to the NCTL is required.

Non-Employee Groups

- 6.141 In order to safeguard the students in our care we require a similar rigorous approach to recruitment for all Non-Employee Groups. Schools must obtain written notification from any agency or third-party organisation that present staff to work within the school that they have completed all the checks we would have undertaken if employing directly, including any Barred List check required for the post. The school must also conduct their own identity check to ensure that the person presenting for work at the school is one and the same person for whom the 3rd party organisation have confirmed the checks have been undertaken. Under no circumstances should any Non-Employee in respect of whom no checks have been obtained, be left unsupervised or allowed to work in regulated activity. To this end individual booklets have been produced for the following:

- Volunteers
- Self Employed Individuals
- Third Party Contractors (which includes Supply)

7 Compliance

- 7.1 I have read and fully understand the above Policy and Procedure and accept and agree to all the terms and conditions outlined in this and the incorporated documents, or part documents, as specified.
- 7.2 If any provision of this Policy is or becomes illegal, void or invalid, that shall not affect the legality and validity of other provisions.

Full name	
Job title/roll	
Signature	
Date	

Ownership and consultation

Document sponsor (role)	Human Resources Director, UK
Document author (name)	
Specialist Advice	Farrer's and Co. (Lawyers) – Aug-Sept.2015

Audience

Audience	Heads Business Managers/Bursars Line/Recruiting Managers SCR Champions Recruitment Community personnel HRBPs Education Team
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Related documentation	Safer Recruitment Toolkit
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