



CATS
GLOBAL SCHOOLS

DECEMBER 2024

Stafford House Recruitment Policy

Going further than others

Aims

To ensure the safeguarding and promotion of the welfare of children and young people. Stafford House expects all staff and volunteers to share this commitment:

- To ensure that we select the best possible person-to-job fit, therefore contributing significantly towards the organisation's effectiveness.
- To ensure all statutory requirements when it comes to Recruitment & Employment. To that end, this policy should ensure that all laws and regulations are met.
- To ensure that our staff work in accordance with British Values and the values of the school. This is not only restricted to those who present as 'a risk of harm' to children. Applying safer recruitment principles, practice and checks, including our Countering Extremism & Terrorism ('Prevent') procedures based on Government guidance, will help deter and/or identify people who are possibly unsuitable for appointment for a wide variety of reasons.
- To be non-discriminatory on the grounds of sex, race, age, religion and belief, sexual orientation, pregnancy and maternity, gender reassignment, marriage and civil partnership or disability

This policy is a combination of elements that are statutory, recommended by the Department for Education and the British Council, or considered as good practice.

To ensure that these policy aims are achieved, all appointing managers should receive training in effective recruitment and selection.

Relationship to other policies: This policy is in line with Keeping Children Safe in Education (KCSIE, September 2024), Safeguarding Policy Teacher Misconduct: The Prohibition of Teachers and the Equality and Diversity Policy.

Responsibility

Ultimate responsibility for this policy and procedure lies with the Principal for each centre and Head of Young Learners for Stafford House Study Holidays.

All staff responsible for selection and recruitment of staff into the organisation will be responsible for adhering to this policy.

The Recruitment Process

Due to the fact that most employees will have the potential for significant access to young people and children, Stafford House will adopt the procedures set out below. This will apply regardless of the employment status of the post, i.e., permanent or casual.

It will be the responsibility of all staff involved in the recruitment and selection of individuals who will work in any capacity for Stafford House to ensure that they have familiarised themselves with the document Keeping Children Safe in Education 2024.

In addition, the immediate line manager who is responsible for recruitment and selection will be responsible for the following:

ADVERTISING

Any form of advertising used to recruit staff to a role with access to young people or children will include or reflect:

- A statement about the employer's commitment to safeguarding and promoting the welfare of children. That the successful applicant is subject to the satisfactory completion of safer recruitment pre-employment checks in line with KCSIE guidelines, including the undertaking of an Enhanced DBS check via the Disclosure and Barring Service and online checks which may include social media.
- The school's commitment to our policy on equal opportunities
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CATS Global Schools are committed to safeguarding and promoting the welfare of our students and expect everyone connected with the organisation to share this commitment. All positions are subject to the satisfactory completion of safer recruitment pre-employment checks in line with KCSIE guidelines. All shortlisted candidates will be required to complete a criminal declaration form prior to interview and be subject to online checks which may include social media.

PRE-APPLICATION INFORMATION

Pre-application information (that meets the Department for Education KCSIE, September 2024 statutory regulations and British Council requirements) available to potential applicants will contain:

- A job description and person specification that states the level of checks that are required for a role that meets the Department for Education statutory regulations. (Reference to Department for Education KCSIE, September 2024)

- An application form that must be completed for all vacancies within the school. The application form must contain all relevant information, in accordance with KCSIE, September 2024.

We will not accept curriculum vitae drawn up by applicants in place of an application form as the application form allows for checking all employment history. Interviews may be conducted prior to applications being completed; however, this does not waive the requirement for the application form to be completed as part of the pre-employment check process.

SCRUTINISING AND SHORT-LISTING

- Applicants must be chosen against the Person Specification
- All application forms and accompanying documentation should be scrutinised to ensure that they are fully and properly completed. Incomplete applications should not be accepted and should be returned for completion.
- Gaps in employment should be identified in accordance with KCSIE, September 1, 2024
- Shortlisted candidates should be asked to complete a self-declaration of their criminal record or information that would make them unsuitable to work with children²
- ~~Shortlisted candidates may be required to undergo online checks which may include social media³~~

References

- Open testimonials should never be accepted as references.
- At least two written references, including the current or most recent employer wherever possible, with a reference request letter that specifically asks all referees to state any known reason why the person should not be employed to work with children and that there should be no material misstatement or omission relevant to the suitability of the applicant.
- Where an applicant is coming straight from education and no professional references can be provided, references from a suitable member of staff from their school, university or college will be acceptable.
- Suitability references should also be sought for internal candidates. Internal references are permissible where appropriate.
- Oral references are acceptable if a suitable checklist is followed, and a record is kept of responses.

¹ Keeping Children Safe in Education 2024; Sections 219 (Application), 225 (Shortlisting), 231 (Selection)

² Keeping Children Safe in Education 2024; Section 221 (Shortlisting)

³ Keeping Children Safe in Education 2024; Section 226 (Shortlisting)

- For internal or external appointments references should ideally be from a senior person with appropriate authority (in a position to be aware of issues), not usually just a colleague.
- On receipt, references will be checked to ensure that all specific questions have been answered satisfactorily. The referee will be contacted to provide further clarification as appropriate, for example if the answers are vague. References will also be compared for consistency with the information provided by the candidate on their application form. Any discrepancies will be taken up with the candidate directly.
- Electronic references should be verified as originating from a legitimate source.
- Any disciplinary warnings, including time-expired warnings that relate to the safeguarding of children, young people, and vulnerable adults will be considered and discussed with the candidate, with further clarification sought from the relevant employer as needed.
- It is vital that the references are obtained and scrutinised before a person's appointment is confirmed and before they start work. Referees will always be asked specific questions regarding:
 - The applicant's suitability to work with children and young people
 - Whether the applicant has ever been the subject of any child protection allegations or concerns and if the answer is yes, what was the outcome of the enquiry.

Invitation to Interview

Wherever possible, the invitation to interview should contain time and place, directions to the venue and membership of the interview panel.

The invitation should also stress that the identity of the successful candidate will need to be checked thoroughly. All candidates should be instructed to bring with them relevant documentary evidence to satisfy DBS and UKVI requirements.

Interview Panel

Best practice suggests that it is better to have a minimum of two interviewers, although it is reasonable for interviews to be conducted by a single person, particularly for short term positions and returning staff.

Interviewers should:

- Have the necessary authority to make decisions about appointment.
- Be appropriately trained, (one member of interview panel must hold a current Safer Recruitment certificate)

- Meet before the interviews to reach a consensus about the required standard for the job to which they are appointing.
- Consider the issues to be explored with each candidate and who on the panel will ask about each of those; and agree their assessment criteria in accordance with the person specification.
- The panel should agree a set of questions they will ask all candidates relating to the requirements of the post, and the issues they will explore with each candidate, based on the information provided in the candidate's application and references (if available)

Interviewers should also explore:

- The candidate's attitude toward children and young people; and the candidate's ability to support the establishment's agenda for safeguarding and promoting the welfare of children.
- Any gaps in the candidate's employment history that have not been explained to a satisfactory level and concerns or discrepancies arising from the information provided by the candidate and/or a referee.
- Whether the candidate wishes to declare anything in light of the requirement for an enhanced DBS Disclosure
- Whether the candidate wishes to declare anything in light of questions that have been (or will be) put to their referees, if references are not obtained prior to the interview.
- Details of disclosures made within the criminal declaration form
- Any concerns resulting from online checks (if applicable)

Offer of Appointment

All offers of employment should be conditional based upon satisfactory checks including the receipt of at least two satisfactory references; verification of the candidate's identity; a satisfactory enhanced DBS Disclosure; a barred list check; an overseas check; (if applicable), a prohibition order check (if applicable); prohibition from management (s.128) (if applicable); verification of the candidate's medical fitness, completion of a criminal declaration, verification of qualifications (if required in line with the Job Description), and not verified at Interview); explanation of gaps in education/employment as required, verification of professional status where required and ensuring the candidate meets the relevant right to work criteria in line with UKVI legislation.

- All checks should be confirmed in writing; documented and retained on the personnel file (subject to relevant advice contained in the DBS Disclosure Code of Practice and the School's data protection arrangements located in the Den (intranet site); and followed up where they are unsatisfactory or there are discrepancies in the information provided.

- Staff promoted internally to a management position are subject to a prohibition from management check (section 128).
- Where a candidate is found to be on the Barred List, or the DBS Disclosure shows they have 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 will be reported to the police and/or the Disclosure & Barring Service and/or The Department for Education Children's Safeguarding Operations Unit (formerly the Teachers Misconduct Team)
- Staff may, as an exception not a rule, commence employment in advance of receipt of their DBS certificate providing that a separate barred list check has been received and their DBS application is cleared⁴. A risk assessment will be undertaken and monitoring/supervision to be in place and reviewed every two weeks until all necessary checks are completed. Any risk assessment must be signed off by the Principal and General Manager before the person starts work. Guidance from the Department for Education and Disclosure and Barring Service to be followed at all times.
- Residential staff will not generally be allowed to start work on a risk assessment, unless it can be guaranteed that they will have no unsupervised contact with under 18's and will be staying away from the campus/where other under 18's are residing.
- Guidance from the Department for Education, Disclosure & Barring Service, Accreditation UK, and British Council Standards is to be followed at all times.
- Where a member of staff has been employed from overseas, a police certificate of good conduct should be requested from that country. Where this is not possible, further checks should be carried out such as additional references from the employer in the country overseas.
- Members of staff transferring between schools are permitted to transfer checks within the Stafford House group, providing appropriate additional checks are completed as required, to ensure policy is adhered to for the relevant position. Checks may include additional barred, prohibition and reference checks, online checks and Principals checklist.
- Principals (or their nominated manager) will complete a checklist prior to appointment, confirming that they have sighted all necessary pre-employment checks and are satisfied that the requirements under this policy have been met.

⁴Cleared: A visible account via UKCrb's application portal that the Enhanced DBS certificate has been completed and contains no information for investigation.

DBS checks

In accordance with British Council requirements, Stafford House staff will have a new enhanced DBS check run every 3 years. This will be done at set times throughout the year for those with a DBS due to expire. If staff have joined the DBS update service, then an update check will be run instead.

In the instance of a candidate joining us with a pre-existing enhanced DBS registered to the DBS update service, we will obtain permission to and conduct an update check. In addition, we will conduct a separate barred list check.

The only group of staff that do not require a DBS check are remote CELTA trainers who do not engage in regulated activity, and therefore do not meet the requirements for an enhanced DBS check.

Recruiting remote CELTA trainers

In the case of recruiting remote CELTA trainers, Stafford House will complete a qualification, reference and right to work check only. To ensure that those who have previously been engaged on a remote CELTA trainer contract do not inadvertently transfer into a face-to-face CELTA trainer (and therefore require a DBS and additional checks), the principal will sign a declaration which will be saved on that individual's file stating that they understand this person may not come into the school premises unless supervised at all times.

CELTA Trainers working remotely from overseas must provide officially certified copies of their ID and right to work documents from their country of residence. In addition, they require qualifications, and reference checks as above.

Recruiting Permanent Staff – Stafford House International, London

Permanent⁵ employees of Stafford House International London are subject to ISI⁶ checks. This is to permit permanent staff members access to the shared services at Guildhouse School⁷. Additional checks required within policy may include Online social media checks, full and

⁵ Summer, sessional or fixed-term contracts are not considered permanent employees

⁶ Independent Schools Inspectorate

⁷ Guildhouse School – Part of CATS Global Schools are subject to ISI checks as standard

complete education/employment continuity, qualifications, overseas police checks for any country resided in for 3+months within the previous 5-years, birth certificate and Teacher registration check. Full information on CATS Global Schools recruitment policy can be accessed via the Den (intranet site),

All checks should be confirmed by a responsible employee from Guildhouse School; documented and retained on the personnel file. Checks should be reviewed by the Principal of Guildhouse school, signing a Principals Checklist prior to the employee being granted unaccompanied access within the Guildhouse school and canteen.

Returning Staff

Staff who work on a sessional basis are considered returners where their period of inactivity of work with Stafford House exceeds 3 calendar months + 5 calendar days. In this instance, staff must complete the pre-employment checks process as a new starter, with the exception of reference and qualification requirements.

References: should there have been only 1 employer between the period of leaving/returning with Stafford House, we will obtain that reference. Should staff have worked for 2 or more employers within the leave/return period, we will obtain 2 new, satisfactory references.

Qualifications: Any relevant, sighted qualifications obtained during previous pre-employment checks may be carried forward to the new 'employee file'. In this instance, a suitable note will be made on the Single Central Register and a new Prohibition from Teaching/Management check, as appropriate, will be obtained. New, relevant qualifications obtained within the leave/return period will be obtained as usual.

Overseas Police Checks

In line with British Council requirements, staff recruited who arrive with us from directly residing overseas, or where their last employment, or place of study was physically based overseas, will require an Overseas Police Check.

Where an Overseas Police Check cannot be obtained, a total of 4 satisfactory references, including 2 obtained from that country may be acceptable.

Where we have satisfactory evidence that an Overseas Police Check is in process, staff may, as an exception not a rule, commence employment in advance of receipt of their Overseas Police Check. A risk assessment will be undertaken and monitoring/supervision to be in place

and reviewed every two weeks until all necessary checks are completed. An additional reference from that country will be obtained and remain on file. Any risk assessment must be signed off by the Principal, Head of Student Experience or General Manager before the person starts work and all other satisfactory checks must be in place.

Agency staff, contractors, and volunteers

Agency staff

When using an employment agency to recruit staff, we will complete all the same checks as if we had recruited the individual directly.

When using an employment agency to provide staff on a supply basis, a signed 'Letter of Assurance' letter must be received to ensure that the agency understands their responsibilities in relation to safeguarding and recruitment.

For each member of staff, the agency must provide written confirmation that the following have been undertaken:

- Identity check
- A check to establish whether the individual is barred from regulated activity relating to young people; or is not subject to any disqualification, prohibition, or restriction.
- Qualification checks have been made.
- 2 satisfactory references have been obtained.
- An enhanced DBS disclosure was obtained.
- Right to work in the UK check was made.
- CV Checked against Vetting and Screening Standard and Documents (Continuity of employment, and any gaps explained).
- Overseas checks undertaken if appropriate.
- Teacher Prohibition Check if appropriate.
- Management Prohibition Check if appropriate.
- Medical fitness for post
- Criminal Declaration is completed.

In addition to the above checks being undertaken the supply staff member must also provide original proof of identity and original DBS on arrival at the school.

Contractors

Any contractor, or any employee of a contractor, who is to work at the school must have had the appropriate suitability checks. These checks will be confirmed in writing by the employer and will include full names and details of checks undertaken. The appropriate level of DBS check is as follows:

- 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.

Regular taxi drivers arranged by the school are considered to be contractors in regulated activity and will require an enhanced DBS check (generally done by the taxi company and confirmed by letter).

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.

We will 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 students on a regular basis, for example, supervised volunteers. We will obtain an enhanced DBS check with barred list information for all volunteers who will be working in regulated activity unless they are able to present a valid enhanced DBS certificate.

We will carry out a risk assessment when deciding whether to seek an enhanced DBS check for any volunteers not engaging in regulated activity.

Arrangements for Monitoring and Evaluation

Stafford House will keep and maintain a Single Central Record (SCR). The SCR will list all staff who are employed at the school, including casual staff, agency staff and volunteers. The SCR will confirm that the required pre-employment checks have been completed, what documents have been checked, when and by whom. Leavers will be removed at appropriate stages throughout the year to ensure this document is up to date.

The principal, along with the P&E Team is responsible for monitoring and evaluating the effectiveness of this policy. This is achieved by monitoring the SCR and reviewing personnel files.

Any reference about difficulties concerning an applicant will be made to the Disclosure & Barring Service and the Teaching Regulation Agency (if applicable).

If a member of staff is dismissed the school is under a duty to consider making a referral to the Teaching Regulation Agency including if a member of staff resigns who may otherwise have been dismissed and a prohibition order may be appropriate.

This policy has regard to guidance from the Secretary of State for Education and also:

- ISSRs Part 4, paragraphs 18-21
- Department for Education guidance Keeping Children Safe in Education (KCSIE, September 2024)
- Teacher Misconduct: the prohibition of teachers July 2014
- ~~Government Guidance on Countering Extremism/Terrorism~~

Teaching Standards

Stafford House are committed to ensuring consistency in teaching quality and provide a framework for professional development, evaluation, and accountability. More information on our commitment to Teaching Standards is available upon request or via the Den (intranet site).



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