

Safer Recruitment, Selection and Disclosure Policy

Millfield Enterprises staffing process is governed by the Keeping Children Safe in Education Guidelines (KCSIE), which Millfield School follows. The process is designed to achieve the best match between the individual's knowledge and skills, experience and character, the requirements of the vacant post and recognition of the need for flexibility to respond to changing conditions.

Millfield Enterprises relies on the skills, competencies and contribution of all employees to ensure the smooth running of all Millfield Enterprises Holiday Courses. The overall aim of this policy, therefore, is to safely attract, recruit and retain staff of the highest caliber.

Millfield Enterprises is committed to tackling discrimination and promoting inclusion through equality and diversity. We ensure that our recruitment procedures (advertisements, shortlisting and interview procedures) are without any hint of direct or indirect discrimination. Millfield Enterprises will make reasonable adjustments in order to ensure that disabled staff or prospective staff are not placed at a disadvantage in comparison with non-disabled staff.

The safety and wellbeing of all Children on our Holiday Courses is our highest priority. We all share an objective to help keep children and young people safe by contributing to providing a safe environment for children. We therefore take great care in the recruitment and selection process at Millfield Enterprises to achieve this to the best we can.

Scope of the Policy

The policy applies to all posts at Millfield Enterprises.

Authorisation of Posts

All posts must be authorised by the Director of Holiday Courses, Director of Studies (For teaching positions) and MELHC Manager (for all non-teaching positions) to ensure consistency of employment practice and that the budget requirements are met.

Advertising of Posts

Advertisements may be internal only or published simultaneously internally and externally. Posts may be advertised internally where it is anticipated that a suitable field of candidates exist and in response to specific needs such as redeployment. All advertisements, whether internal or external, must contain the Schools' safeguarding statement.

The aim of advertising is to attract a wide range of high quality candidates from diverse backgrounds.

Recruitment Documentation

Prior to advertising, a job description which describes the purpose, duties and responsibilities of the post should be prepared.

The qualifications, skills, experience, knowledge, aptitudes and abilities that are essential and desirable for the post should also be identified. They will not include any potentially discriminatory requirements.

All adverts will state that employment is subject to an enhanced DBS check, satisfactory references and any other employment checks.

Short listing

All applicants for employment will be required to complete an application form containing questions about their academic and employment history, as well as their suitability for the role. A curriculum vitae will not be accepted in place of a completed application form.

Short listing will be based on the selection criteria for the role and compared against the information contained within the candidates application form; this will assess the candidate's qualifications, skills, experience, knowledge, aptitudes and abilities. The capability of the individual to perform in the position will be the major factor and in certain roles the ability to work with others will be taken into account.

The Interview Process

At least one individual conducting the interview must have completed Safer Recruitment in Education Training. Candidates will be asked both technical / competency based questions as well as questions that attest to the match of the Person Specification in the Job Description. The interview team will ensure that candidates with a disability or special needs are fully provided for at the interview, providing notification has been made in advance.

After Interview

Offers of appointment are subject to the receipt of satisfactory checks (as outlined in the Selection and Recruitment Checklist). All appointments are subject to the continued declaration of any charges, arrests or convictions, including serious driving offences. Failure to disclose as stated could lead to the termination of employment.

Pre-Employment Checks

Pre-employment checks are an essential part of our responsibility under the Children Act and an expectation of the National Boarding Standards and DfE circular Keeping Children Safe In Education:

Statutory guidance for all schools and colleges. Whilst no system will guarantee that no one unsuitable is ever recruited to Millfield Enterprises, a high standard of scrutiny should reduce the potential for harm being done to the children in our care.

If it is decided that an offer of employment following an interview is to be made, any such offer will be conditional on the following pre-employment checks:

1. The receipt of two written references (one of which must be from the applicant's most recent employer) which Millfield Enterprises considers to be satisfactory. References should make specific reference to a candidate's suitability to work with or near children. The School will only accept references obtain directly from the referee by the School, and will ensure consistency with the information provided by the candidate. References will be verbally verified for all new staff and where necessary for returners.
2. An explanation of any gaps within the applicant's education or employment history since the age of 16 years.
3. Verification of relevant qualifications which Millfield Enterprises deems a requirement for the post, or which the applicant cites of their application.
4. Verification of the applicants' identity, including address and date of birth (where this has not previously been verified).
5. An Enhanced Disclosure and Barring Service (DBS) check which the School considers to be satisfactory.
6. Confirmation that the applicant is not named on the Children's Barred List*.
7. Should the individual have lived or worked abroad within the last 10 years for a period of 3 months or more, then a Certificate of Good Conduct will be required, where you have worked in a School in the UK since returning from overseas, the standard checks can be made for subsequent appointments.
8. Confirmation that the applicant is not disqualified from working in connection with early or later years provision through the completion of a Disqualification Declaration**
9. Medical Declaration form to be completed confirming the applicant's medical fitness for the role.
10. Verification of the applicant's right to work in the UK.
11. Where applicable confirmation that the applicant is not subject to a direction under section 142 of the Education Act 2002 which prohibits, disqualifies or restricts them from providing education at a school, taking part in the management of an independent school or working in a position which involves regular contact with children.
12. Where applicable confirmation that the applicant is not subject to a direction under section 128 of the Education and Skills Act 2008 which prohibits, disqualifies or restricts them from being involved in the management of an independent school.
13. Where applicable confirmation as to whether the applicant is subject to any restrictions imposed by all EEA authorities.
14. Any other employment check that may be necessary.

* The School is not permitted to check the Children's Barred List unless an individual will be engaging in "regulated activity". Whether the position amounts to "regulated activity" will therefore be considered by Millfield Enterprises. Any position undertaken at, or on behalf of Millfield Enterprises amount to "regulated activity" if it is carried out:

- Frequently, meaning once a week or more; or
- Overnight, meaning between 2.00am and 6.00am; or
- Satisfies the "period condition", meaning four times or more in a 30 day period; and
- Provides the opportunity for regular contact with children.

Roles which are carried out on an unpaid/voluntary basis will only amount to regulated activity if, in addition to the above, they are carried out on an unsupervised basis. It is likely that in nearly all posts at Millfield Enterprises, they will amount to regulated activity.

** Under the Childcare Act 2006, the Childcare (Disqualification) Regulations 2009 and the Keeping Children Safe in Education Guidelines (KCSIE), the School is required to ensure that all staff working or directly concerned in the management of Early Years settings (children aged 0-5 years), including reception and out of hours school care for children up to eight years of age are not "disqualified" from working within such a setting.

Once these safeguarding checks have been completed a newly appointed employee can begin their employment. Their details are recorded on Millfield Enterprises Central Register of Appointments, which is maintained by the Recruitment Co-ordinator.

Outside Providers and Contractors

Outside Providers and Contractors are deemed by the School as anyone engaged to undertake works or an activity on behalf of the School who is not considered to be a member of staff or a volunteer at the School.

The extent of the check required by the School will be dependent on the works and activity being undertaken further information can be found in the Policy for the Management of Outside Providers, Contractors and Ancillary Staff.

Visiting Speakers

In having regard for the Prevent Duty Guidance, Visiting Speakers, whether invited by pupils or staff, should be appropriately supervised by a member of Staff, under no circumstance should they be left alone with children and they are required to follow the Millfield Visitor Policy.

Appropriate actions should be taken by the member of staff inviting the Visiting Speaker into the School to ensure their suitability in doing so the School will always have regard to the Prevent Duty Guidance and the definition of "extremism" as set out in KSCIE.

For complete guidance please refer to the Millfield Visiting Speaker Protocol

Policy Recruitment of Ex-Offenders

Millfield Enterprises will not unfairly discriminate against any applicant for employment on the basis of conviction or other details disclosed. Millfield Enterprises makes appointment decisions on the basis of merit and ability. If an applicant has a criminal record this will not automatically bar them from employment. Each case will be decided on its merits in accordance with the objective assessment criteria.

All positions within Millfield Enterprises are exempt from the provisions of the Rehabilitation of Offenders Act 1974. All applicants must therefore declare all previous convictions and cautions, including those which would normally be considered "spent" except those received for an offence committed in the United Kingdom if it has been filtered in accordance with the DBS filtering rules.

A failure to disclose a previous conviction (which should be declared) may lead to an application being rejected or, if the failure to disclose is discovered after employment has started, may lead to summary dismissal on the grounds of gross misconduct. A failure to disclose a previous conviction may also amount to a criminal offence.

It is unlawful for Millfield Enterprises to employ anyone who is barred from working with children. It is a criminal offence for any person who is barred from working with children to apply for a position. Millfield Enterprises will make a report to the Police and / or the DBS if:

- it receives an application from a barred person;
- it is provided with false information in, or in support of an applicant's application; or
- it has serious concerns about an applicant's suitability to work with children.

Assessment criteria

In the event that relevant information (whether in relation to previous convictions or otherwise) is volunteered by an applicant during the recruitment process or obtained through a disclosure check, Millfield Enterprises will consider the following factors before reaching a recruitment decision:

- whether the conviction or other matter revealed is relevant to the position in question;
- the seriousness of any offence or other matter revealed;
- the length of time since the offence or other matter occurred;
- whether the applicant has a pattern of offending behaviour or other relevant matters;
- whether the applicant's circumstances have changed since the offending behaviour or other relevant matters; and
- the circumstances surrounding the offence and the explanation(s) offered by the applicant.

If the post involves regular contact with children, it is the Millfield Enterprise's normal policy to consider it a high risk to employ anyone who has been convicted at any time of any the following offences:

- murder, manslaughter, rape, other serious sexual offences, grievous bodily harm or other serious acts of violence; or
- serious class A drug related offences, robbery, burglary, theft, deception or fraud.

If the post involves access to money or budget responsibility, it is Millfield Enterprise's normal policy to consider it a high risk to employ anyone who has been convicted at any time of robbery, burglary, theft, deception or fraud.

If the post involves some driving responsibilities, it is Millfield Enterprise's normal policy to consider it a high risk to employ anyone who has been convicted of drink driving [within the last ten years].

Assessment procedure

In the event that relevant information (whether in relation to previous convictions or otherwise) is volunteered by an applicant during the recruitment process or obtained through a disclosure check, Millfield Enterprises will carry out a risk assessment by reference to the criteria set out above. The assessment form must be signed by the Director of Holiday Courses before a position is offered or confirmed.

If an applicant wishes to dispute any information contained in a disclosure, they may do so by contacting the DBS. In cases where the applicant would otherwise be offered a position were it not for the disputed information, Millfield Enterprises may, where practicable and at its discretion, defer a final decision about the appointment until the applicant has had a reasonable opportunity to challenge the disclosure information.

Retention and security of disclosure information

Millfield Enterprise's policy is to observe the guidance issued or supported by the DBS on the use of disclosure information.

In particular, the School will:

- store disclosure information and other confidential documents issued by the DBS in locked, non-portable storage containers, access to which will be restricted;
- not retain disclosure information or any associated correspondence for longer than is necessary, and for a maximum of six months. The School will keep a record of the date of a disclosure, the name of the subject, the type of disclosure, the position in question, the unique number issued by the DBS and the recruitment decision taken;
- ensure that any disclosure information is destroyed by suitably secure means such as shredding; and
- prohibit the photocopying or scanning of any disclosure information without the express permission of the individual to whom the disclosure relates.

Retention of Records

The School is legally required to undertake the above pre-appointment checks. Therefore, if an applicant is successful in their application, the School will retain on their personnel file any relevant information provided as part of the application process. This will include copies of documents used to verify identity, right to work in the UK, medical fitness and qualifications. Medical information may be used to help Millfield Enterprises to discharge its obligations as an employer e.g. so that the

School may consider reasonable adjustments if an employee suffers from a disability or to assist with any other workplace issue.

This documentation will be retained by the School for the duration of the successful applicant's employment with the School.

If the application is unsuccessful, all documentation relating to the application will normally be confidentially destroyed after six months.

The same policy applies to any suitability information obtained about volunteers involved with School activities.

Reviewed Zoe Barker February 2018

RECRUITMENT AND SELECTION CHECKLIST

Detailed below is the recruitment and selection process that should be followed in accordance with the Independent Schools

Inspectorate (ISI) requirements, and the Keeping Children Safe In Education guidelines, when recruiting and appointing a new member of staff for Millfield Enterprises. This process should be followed for all appointments, and all checks must be completed before an employee can commence their employment with Millfield Enterprises.

Millfield Enterprises recruitment process is governed by the Schools principles of non discrimination and is designed to achieve the best match between the individual's knowledge and skills, experience and character, the requirements of the vacant post and recognition of the need for flexibility to respond to changing conditions.

| Pre-Advertisement | | To be Completed By | Authorised By |
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| 2 | Job Description and Specification: Prior to advertising a vacancy, a job description describing the purpose, duties and responsibilities of the post should be prepared. This should also include a person specification outlining the qualifications, skills, experience, knowledge, aptitudes and abilities that are essential and desirable for the post. | DOS & MELHC Manager | Director of Holiday Courses |
| 3 | Advertising: All appointments will be advertised and subject to a competitive selection procedure. Advertisements may be internal only or published simultaneously internally and externally. Posts may be advertised internally where it is anticipated that a suitable field of candidates exists and in response to specific needs such as redeployment. The aim of advertising is to attract a wide range of high quality candidates from diverse backgrounds. All adverts should include the safeguarding policy i.e. statement of commitment to safeguarding and promoting welfare of children, and the need for successful applicants to be DBS checked. | DOS & MELHC Manager | Director of Holiday Courses |
| | Agencies: The use of employment agencies will only be utilised where advertisements have not produced an adequate field of candidates. The agency terms and conditions must be signed by the Director of Holiday Courses before any agreement is entered. | DOS & MELHC Manager | Director of Holiday Courses |

| Short Listing | | | |
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| 4 | Applications: During the recruitment process application forms can be downloaded from the Enterprises website. In addition the candidate has to confirm that they have read the job description, Application and Recruitment Guidelines, and the Schools Child Protection policy. For those applicants without access to the internet, a hard copy of all the above documents will be posted to them. | Line Manger and HR Department | |
| 5 | Short listing: short listing will be based on the selection criteria which assess the candidate's qualifications, skills, experience, knowledge, attitudes and abilities. The capability of the individual to perform in the position will be the major factor, but the ability to work with others and individual potential will be taken into account. Any discrepancies/anomalies/gaps in employment should be noted and explored during the interview should the candidate be short listed. | DOS & MELHC Manager | |
| Pre-Interview | | | |

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| 6 | Invitation to Interview: Candidates will be invited to attend an interview or attend one of our Trials Days. Candidates will be given all relevant information and instructions. All candidates will be asked to bring a form of identification and proof of any qualifications declared on their application form to the interview. | DOS, MELHC Manager & Recruitment Co-ordinator | |
| 8 | Interview Panel and Arrangements The interviewer should use the interview proforma where questions / assessment criteria/standards should be noted. For all vacancies, the interviewer must have undertaken the Safer Recruitment Training. | DOS & MELHC Manager | |
| Interview | | | |
| 9 | The interview: Explores applicants' suitability and where applicable their ability to work with children for the post. Identity and qualifications of interview candidates should be verified on the day of interview by scrutiny of appropriate original documents: copies of documents taken and placed on file. | DOS & MELHC Manager | |
| Conditional Offer of Appointment and Pre-Appointment Checks | | | |
| Offers of appointment should be made subject to the satisfactory completion of the following pre-appointment checks and relevant probationary period: | | | |
| 10 | References: 2 written references should be obtained, one of which should be from the last employer. | DOS, MELHC Manager & Recruitment Co-ordinator | |
| 11 | Identity: if this could not be verified during the interview, proof of identity should be obtained, verified and placed on file. | DOS, MELHC Manager & Recruitment Co-ordinator | |
| 12 | Qualifications: if these could not be verified during the interview, proof of qualifications should be obtained and placed on file. | DOS, MELHC Manager & Recruitment Co-ordinator | |
| 13 | Right to work in the UK: proof of right to work in the UK should be obtained and placed on file. | DOS, MELHC Manager & Recruitment Co-ordinator | |
| 14 | Evidence of additional overseas checks: Where the candidate has lived or worked abroad within the last 10 years a Certificate of Good Conduct is required from the country in which they were resident. This is to be obtained by the candidate. | Employee | |
| 15 | DBS: Satisfactory DBS Check to be received and checked for all new appointments. Where an offer of employment has been made to a previous employee of the School a new DBS will need to be obtained if there has been a break in service of 3 months or more. | Recruitment Co-ordinator | |
| 16 | Medical Declaration: A medical statement form is to be completed by the employee and placed on file, where necessary a medical declaration is to be obtained from the employees GP, and returned to the HR department and placed on file. If necessary the School's Doctor may be consulted. | Recruitment Co-ordinator | |
| 17 | Proof of Address: proof of address should be obtained and copy placed on file. | Recruitment Co-ordinator | |
| 18 | List 99 (Barred List Check) | Recruitment Co-ordinator | |
| 19 | Prohibition from teaching check (Teachers only) | Recruitment Co-ordinator | |
| 19 | Prohibition from Management - for those staff appointed to a managerial positions | Recruitment Co-ordinator | |

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| 20 | Full Employment History - If not obtained prior to interview full employment history should be obtain and placed on file. Any gaps of more than 3 months from leaving full time employment at the age of 16 years, should be scrutinised and explained. | DOS & MELHC Manager | |
| 21 | Disqualification Declaration - to be completed by those individuals working or directly concerned in the management of Early Years settings (children aged 0-5 years), including reception and out of hours school care for children up to eight years of age. | Recruitment Co-ordinator | |
| Following the satisfactory completion of the above pre-employment checks (points 10 - 20) an official start date will be confirmed with the candidate. | | | |

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