Safer Recruitment Policy

1. Introduction

This policy outlines CT Skills commitment to safeguarding the welfare of children, young people and vulnerable adult learners is part of our core business and all staff must be aware of their responsibilities in this regard. We have implemented procedures designed to deter, prevent and identify unsuitable people working with our learners. These procedures are designed to comply with the guidance given by the DfE as defined in "Keeping Children Safe in Education (KCSIE) September 2026" in conjunction with "Working Together to Safeguard Children 2023" and form an element of the CT Skills Safeguarding Policy to which reference should also be made.

The aim of this Safer Recruitment Policy is to ensure that CT Skills:

- recruit the best possible employees based on their merits, abilities and suitability for the role
- consider all applicants fairly and consistently
- ensure no job applicant is treated unfairly due to a protected characteristic
- comply with relevant employment legislation, recommendations and guidance including statutory guidance published by the Department for Education (DfE), Keeping Children Safe in Education – September 2026 guidance (or updated statutory guidance), the Prevent Duty Guidance for England and Wales (2023) (updated May 2024) and any guidance or code of practice published by the Disclosure and Barring Service (DBS) and adhere to the obligations set out by the Modern Slavery Act 2015
- meets its commitment to Safeguarding by completion of pre-employment checks
- ensure all stages of the recruitment process contain measures to deter, identify, prevent and reject unsuitable people from gaining access to vulnerable young people and adults within CT Skills
- ensure all personal data is collected and processed in line with the UK General Data Protection Regulations (UK GDPR) / Data Protection Act 2018, our Job Applicant Privacy Notice and Data Protection Policy

Employees involved in the recruitment and selection of staff are responsible for familiarising themselves with and complying with the provisions of this policy.

2. Recruitment and Selection Procedure

Advertising

To ensure equality of opportunity, CT Skills will advertise all vacant positions to encourage as wide a field of applicant as possible; this may entail an external advertisement.

All adverts will have an explicit statement regarding the Company's commitment to safeguarding and promoting the welfare of our learners and the requirement for enhanced DBS checks, as the role may include engagement with under 18's.

All posts advertised will have a job description that clearly defines the main duties of the role, person specification, minimum qualifications and experience required.

Applications

All documentation relating to applicants will be treated confidentially in accordance with the GDPR (2018).

All applicants will be required to submit their CV. CT Skills will then request all applicants to complete, 9.29.1 Application for Employment and Self Declaration form to be completed by the applicant to account for any gaps, missing information, repeated changes in employment, or moves to supply work without clear and verifiable reasons, ensuring information is consistent, can be verified and is accurate.

If the role being applied for falls into the scope of regulated activity that includes working with children under 18, and the applicant is on a DBS Barred List, then it is an offence for the applicant to continue to apply for the post and to seek to work in regulated activity with a group with which they are barred.

Please see the Safeguarding Vulnerable Groups Act 2006 and Safer Recruitment requirements as per KCSIE 2026 for further information and guidance.

Pre-employment checks

In line with KCSIE 2026 guidance, CT Skills recognises the importance of online safety and digital vetting as part of the safer recruitment process. This includes conducting appropriate online pre-recruitment checks, such as reviewing publicly available social media activity to help identify any safeguarding or suitability concerns relating to individuals applying to work with children, young people or vulnerable adults.

Interviews

There will always be a face-to-face interview, either in person or via Microsoft Teams, except in extreme circumstances, and wherever possible a minimum of two interviewers will interview the applicants for the vacant position. The interview process will explore the applicant's ability to carry out the job description and meet the person specification. It will also enable CT Skills to explore any anomalies or gaps that have been identified in order to satisfy themselves that the chosen applicant can meet the safeguarding criteria.

In addition to the interview, the recruiting manager, in conjunction with Human Resources, will decide on the most appropriate assessment methods and timetable for the role, eg initial assessments in English and Mathematics, microteach, presentation etc.

At invite to interview stage, it will be made clear that the role is exempt from the provisions of the Rehabilitation of Offenders Act 1974. Applicants will be specifically asked if, prior to a DBS check being carried out, there is anything they wish to notify the company. Applicants will be asked to complete, 9.29.2 Criminal Record Declaration Form (Exempt Positions).

We recognise the contribution that former or ex-offenders can make as employees and volunteers and welcome applications from them. A person's criminal record will not, in itself, debar that person from being appointed to a post. Any information given will be treated in the strictest confidence. Suitable applicants will not be refused posts because of offences which are not relevant to the role, and which do not make them a risk in the role for which they are applying.

References

All offers of employment are subject to the receipt of a minimum of two references which are considered satisfactory by the Company. One of the references must be from the applicant's current or most recent employer. References should cover at least the last 5 years of employment.

References will always be sought and obtained directly from the referee and their purpose is to provide objective and factual information to support appointment decisions. All referees will be asked whether they believe the applicant is suitable for the job they have applied and whether they have any reason to believe that the applicant is unsuitable to work with children, young people or vulnerable adults. All referees will be asked if they have any concerns that the applicant may have been radicalised so that they support terrorism or any form of 'extremism'.

No questions will be asked about health or medical fitness prior to any offer of employment being made.

Any discrepancies or anomalies will be followed up. Direct contact by phone will be undertaken with each referee to verify discrepancies in the reference.

CT Skills does not accept open references, testimonials or references from relatives.

Offers of employment

If it is decided to make an offer of employment following the formal interview, any such offer will be conditional on the following:

- Verification of the individual's identification
- Verification of the individual's right to work in the United Kingdom, by carrying out checks in person or using a certified Identification Service Provider (IDSP)
- At least two satisfactory previous employment references being obtained, one of which should be from their current employment (references should cover at least the last 5 years of employment)
- Verification of relevant qualifications
- Satisfactory 'basic' or 'enhanced' DBS check result including children's barred list (for enhanced checks only) where the post is deemed as "regulated activity"
- Completion of a health questionnaire
- Verification of full driving licence and appropriate motor insurance for business use (where applicable)

- Satisfactory completion of 6-month probationary period

A personal file checklist will be used to track and audit paperwork obtained in accordance with Safer Recruitment Training. The checklist will be retained on personal files.

All appointments will be issued with a written statement of employment particulars. All appointments are subject to a probationary period of 6 months during which time a reduced notice period applies enabling the termination of employment for whatever reason, by either the employee or CT Skills in a shorter time frame than would normally apply under the standard contract terms. The Company also reserves the right to extend the probationary period should it be deemed necessary.

DBS (Disclosure and Barring Service) Certificate

DBS certificates will be re-checked every 3 years for all employees. For those in job roles that are not learner or customer facing they will have a standard DBS check. Where a role is predominantly learner facing, these employees will be required to have an enhanced DBS check and certification with children's barred list. We also require employees in learner facing roles to register to the DBS Update Service, this allows:

- Applicants to keep their DBS certificates up to date
- Employers to check a DBS certificate

Please note, there is a cost to do this, however, CT Skills will refund this back to employees once completed.

In the unlikely event that it has not been possible to obtain a satisfactory Disclosure before the individual is scheduled to commence employment and CT Skills believe it is necessary for the individual to commence employment, the Directors have the discretion to allow the individual to commence work in the event that the employee is appropriately supervised and all the other pre-employment checks have been completed. A risk assessment *(9.47 Risk Assessment Form – Commencing Employment Prior to DBS Clearance*) will be carried out. This should reflect what is known about the person concerned, their experience, the nature of their duties and the level of responsibility they will carry.

The DBS no longer issues certificates to employers. Where a DBS certificate is returned clear, the DBS management system displays this as "certificate contains no information". The disclosure number and date of issue will be logged on our central register. The Company does not require sight of the original certificate sent to the employee in these circumstances.

Dealing with convictions

Where a DBS Certificate is returned with details of convictions, CT Skills will give consideration to the Rehabilitation of Offenders Act 1974 and also:

- the nature, seriousness and relevance of the offence
- how long ago the offence occurred

- one-off or history of offences
- changes in circumstances
- de-criminalisation and remorse

The applicant will be required to provide the Company with a copy of the certificate immediately. A meeting will take place face-to-face to with the manager (or senior manager) to establish facts and will be recorded on form 9.48 *DBS – Consideration of Cautions & Criminal Convictions*. HR may also be present. 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, the Company will evaluate all of the risk factors above before a position is offered or confirmed.

If the applicant wishes to dispute any information contained in a disclosure, they may do so by contacting DBS. In cases where the applicant would otherwise be offered a position were it not disputed information, the Company 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.

Modern Slavery and Human Trafficking

CT Skills recognises that we have an obligation to prevent slavery and human trafficking and will do all in its power to prevent it within its business, partners and other external relationships with whom it operates.

All CT Skills employees have access to a dedicated whistle blowing procedure which they can use to voice any concerns. We are committed to protecting the confidentiality of any employee who contacts this service.

Medical fitness

CT Skills is legally required to verify medical fitness of anyone appointed to a post at the Company, after an offer of employment has been made but before the appointment can be confirmed.

All applicants are requested to complete a medical questionnaire and where appropriate a doctor's medical report may be required. This information will be reviewed against the Job Description and Person Specification (Job Framework) for the role, together with details of any other physical or mental requirements of the role.

CT Skills is aware of its duty under the Equality Act 2010. No job offer will be withdrawn without first consulting with the applicant, obtaining medical evidence, considering reasonable adjustments and suitable alternative employment.

Induction Programme

All new employees will be given an induction programme which will clearly identify CT Skills' policies and procedures, including the Safeguarding Policy. Our Employee Handbook will make clear the contractual expectations which will govern how employees carry out their roles and responsibilities.

Record Retention/Data Protection

CT Skills is legally required to undertake the above pre-employment checks. Therefore, if an applicant is successful in their application, CT Skills will retain on their personal 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 the Company to discharge its obligations as an employer e.g. so that the Company may consider reasonable adjustments if an employee suffers from a disability.

This documentation will be retained by the Company for the duration of the successful applicant's employment with CT Skills. All information retained on employees is kept electronically in a secure drive and password protected.

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

CT Skills will retain the recruitment documentation on all unsuccessful applicants for a period of 6 months, after which time the notes will be confidentially destroyed.

Information about how we collect and process data as part of the recruitment process is detailed in our Job Applicant Privacy Notice and is in line with our Data Protection Policy and GDPR (2018).

Independent staff – Self Employed

All work undertaken by self-employed Independent staff will be subject to, and cannot be undertaken prior to, a signed copy of the contract agreement, the return of a satisfactory basic DBS check result, unless undertaking "regulated activity" where an enhanced DBS check will be completed, a copy of the individual's CV, and receipt of references that meet the requirements of the Company's policy.

Volunteers

CT Skills will request the following checks on all volunteers who are involved on a regular basis, undertaking regulated activity:

- Identity checks
- Enhanced DBS Disclosure with Children's Barred List
- Qualifications, if applicable
- References
- An informal interview

Appropriate Risk Assessment and/or additional supervision will be planned to ensure safety as necessary.

Work Experience

CT Skills will ensure that any individual on work experience is suitably inducted and a risk assessment will be carried out prior to commencement.

Monitoring and Evaluation

The HR Manager and Designated Safeguarding Lead will be responsible for ensuring that this policy is monitored and evaluated throughout the Company.

Documents
Policies, procedures and forms referenced in this policy are available on the CT Skills Cloud Document Store.