Recruitment, selection and vetting policy

# Introduction

Recruit2Schools Ltd is an employment business supplying temporary workers to work within the education sector. The work seekers that we engage must pass thorough and robust vetting procedures before we can consider them for any placement or assignment with our clients and this policy sets out our commitment to comply with the highest standards at each stage of the recruitment process.

Our processes are compliant with relevant legislation and the Department for Education’s statutory guidance: **Keeping Children Safe in Education (KCSIE)**. We ensure our temporary workers remain compliant throughout their time with Recruit2Schools by undertaking the checks set out in this policy.

We have processes in place whereby we obtain feedback from our clients once placements are made.

# Recruitment and Selection

## Face to face interviews

Before placing any work seekers on assignments, Recruit2Schools meets with them face to face either in person or via video. Before meeting the work seeker, we ask them to forward a copy of their CV and advise them of the documentation they are required to forward to us or bring with them to the interview.

During the interview, a suitably trained and competent consultant will assess the work seekers suitability for the role by discussing their previous work history and qualifications. Recruit2Schools uses a template of standard relevant questions to ensure equality of approach and seek to understand the work seeker’s knowledge and understanding of protocols and to assess how they would react to various scenarios.

Provided the outcome of the interview is satisfactory, Recruit2Schools will then start the pre-employment checks.

## Right to work checks

Recruit2Schools conducts right to work checks on every work seeker we intend to supply to our clients to comply with immigration requirements, recruitment industry legislation and to ensure that guard against the risk of supplying a person who is not permitted to work, to a client. All checks are carried out in line with best practice and equality law. We will conduct **a manual document check, a digital identity verification check through an Identity Service Provider (IDSP)** or **an online check using the Home Office Online or Employers checking service** to establish a candidate's right to work. Where a right to work check is conducted using the online service, the information is provided in real-time, directly from Home Office systems and so there will be no requirement to see the documents listed below.

### Manual right to work checks

For physical document checks we follow the three-step process set out in the [Home Office Guidance: An employer's guide to right to work checks:](https://www.gov.uk/government/publications/right-to-work-checks-employers-guide)

* **Step one:**

We **obtain** the work seekers original documents. The work seeker must provide us with either one document (or a combination of documents where applicable) from [LIST A](https://www.gov.uk/government/publications/right-to-work-checks-employers-guide/an-employers-guide-to-right-to-work-checks-6-april-2022-accessible-version#annex-a-lists-of-acceptable-documents-for-manual-right-to-work-checks) of the Home Office right to work checklist or any of the documents or combination of documents from [LIST B](https://www.gov.uk/government/publications/right-to-work-checks-employers-guide/an-employers-guide-to-right-to-work-checks-6-april-2022-accessible-version#annex-a-lists-of-acceptable-documents-for-manual-right-to-work-checks) of the checklist. We only accept original documents. Photocopies or electronic scans are not acceptable, and we must be in receipt of the physical documents.

* **Step two:**

We take reasonable steps to check that the document is genuine and that the work seeker is the person named in the document.

For each document we complete the following checks:

* check any photographs are consistent with the appearance of the work seeker;
* check any dates of birth listed are consistent across documents and that we are satisfied that these correspond with the appearance of the work seeker;
* check that the expiry date for permission to be in the UK has not passed;
* check that the documents are valid and genuine, have not been tampered with and belong to the holder; and
* if given two documents which have different names, we ask for a further document to explain the reason for this. The further document could be a marriage certificate, a divorce decree absolute, a deed poll or a statutory declaration.
* check that in relation to restrictions on permission to work in the UK the work seeker is allowed to do the type of work they have applied for. For students, we will obtain a copy of their academic term times from the relevant institution.
* **Step three:**

We make a copy of the relevant page/s of the document in a format which cannot be subsequently altered. This can include a photocopy or a scan in a non-rewritable format.

Where the work seeker has provided us with a passport, we will photocopy or scan the following: any page with the document expiry date, the holder’s nationality, date of birth, signature, leave expiry date, biometric details, photograph and any page containing information indicating that the holder has an entitlement to enter or remain in the UK and undertake the work in question.

For all other documents, we make a clear copy or scan of the document in full.

All copies of documents taken will be kept securely for the duration of the work-seeker’s engagement with Recruit2Schools and for two years afterwards. The copy will then be securely destroyed.

We will make a note of the date on which the check was conducted by either a declaration on the hardcopy or on a separate record.

### Digital identity verification check

For digital document checks we follow the three-step process set out in the [Home Office Guidance: An employer’s guide to right to work checks:](https://www.gov.uk/government/publications/right-to-work-checks-employers-guide)

* **Step one:**

We will use the services of an Identification Service Provider (IDSP) who can satisfy a minimum of a Medium Level of Confidence check.

* **Step two:**

Once we have received the output form from the IDSP confirming details of the check, we will satisfy ourselves that both the photograph and biographic details of the work-seeker such as their date of birth, are consistent with the person presenting themselves to us for work finding services. We may conduct this check via video call or in person.

* **Step three:**

All copies of the output forms will be kept securely for the duration of the work-seeker’s engagement with Recruit2Schools and for two years afterwards. The copy will then be securely destroyed.

### Online right to work checks

For online right to work checks we will follow the three basic steps set out in the the [Home Office Guidance: An employer's guide to right to work checks:](https://www.gov.uk/government/publications/right-to-work-checks-employers-guide)

* **Step one:**

Where the work-seeker provides us with a valid share code we will use the Home Office online right to work checking service and will only supply the person if the online check confirms they are entitled to do the work in question;

* **Step two:**

We satisfy ourselves that any photograph on the online right to work check profile page is of the individual presenting themselves for work; and

* **Step three:**

We retain a clear copy of the profile page provided by the online right to work check (storing that response securely, electronically or in hardcopy) for the duration of the work-seekers engagement with Recruit2Schools and for two years afterwards. The copy will then be securely destroyed.

### Employers checking service checks

If we are unable to conduct an online check because:

* we have not been provided with any acceptable documents listed in List A or B of the guidance and we have been unable to obtain an online check via share code;
* we have been provided with a non-digital Certificate of Application (CoA), email or acknowledgement letter confirming an application for the EU Settlement Scheme (EUSS) was made on or before 30 June 2021;
* we have been provided with evidence that the worker is a long-term resident of the UK who arrived before 1988 but have not received documents in List A or B;
* we have been provided with a non-digital CoA confirming an application for the EUSS was made on or after 01 July 2021
* we have not been provided with any acceptable documents but have been given information that indicates an application for permission to stay was made to the Home Office prior to the expiry of the workers previous permission or there is an appeal or administrative review pending;
* we have been provided with a valid application registration card.

In these circumstances we will use the Home Office’s employers checking service and await receipt of a positive verification notice before supplying the work seeker to a client.

## ID checks and proof of address

In addition to the above right to work documents, we also require the work seeker to provide us with two original[[1]](#footnote-1) documents, one to confirm their identity and one to confirm their address. The type of documents that we accept are a valid driving licence, Passport, utility bill, bank statement, government document/letter which includes the work seeker’s national insurance number.

Copies of documents will be taken and noted with the date the documents were checked. Copies will be kept securely for the duration of the work-seeker’s engagement with Recruit2Schools and for at least 1 year after. The copy will then be securely destroyed.

## References

In accordance with Regulation 22 of the Conduct of Employment Agencies and Employment Businesses Regulations 2003 (and the terms of the Welsh Government Supply Teacher Framework), we require (at least) two references that must cover the previous two years of employment for all work seekers. One reference must be from the work seekers' most recent employer. References must be from non-family members who give their consent for the reference to be forwarded to our clients.

We will verify all references by contacting the referees directly, either by telephone or email.

Verbal references will be recorded, and a copy of the record will be sent to the referee via their school email address to obtain their written confirmation that the record is correct and their consent to forward it to a third party. If the referee does not provide their written confirmation that the record is correct and does not give their consent, the reference will not be accepted.

Open references will not be accepted. References from other employment businesses must, as a minimum, include dates of employment and details of any safeguarding issues if they are known.

# Vetting

## Rehabilitation of Offenders Act Declaration

During the registration process, all work seekers are required to complete our Rehabilitation of Offenders Act Declaration and as required for regulated sectors, disclose all spent and unspent convictions, subject to the filtering rules.

If a work-seeker discloses any convictions or cautions, Recruit2Schools will consult the Education Workforce Council, and the REC’s legal helpline to obtain advice and guidance on whether the work seeker can work in the education sector. We will also ensure that the school has a policy on the treatment of ex-offenders, is aware of the conviction/s to allow them to conduct their own risk assessment and determine their assessment of a candidate’s suitability for the role in accordance with its policy on ex-offenders.

## Rehabilitation of Offenders Policy

As an organisation assessing applicants’ suitability for positions which are included in the Rehabilitation of Offenders Act 1974 (Exceptions) Order and using criminal record checks processed through the Disclosure and Barring Service (DBS), Recruit2Schools complies fully with the [DBS code of practice](https://www.gov.uk/government/publications/dbs-code-of-practice) and undertakes to treat all applicants for positions fairly.

Recruit2Schools undertakes not to unfairly discriminate against any subject of a criminal record check on the basis of a conviction or other information revealed.

Recruit2Schools can only ask an individual to provide details of convictions and cautions that Recruit2Schools are legally entitled to know about. Where a DBS certificate at either standard or enhanced level can legally be requested (where the position is one that is included in the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 as amended), and where appropriate (Police Act Regulations as amended),

Recruit2Schools can only ask an individual about convictions and cautions that are not protected.

Recruit2Schools is committed to the fair treatment of its staff, potential staff or users of its services, regardless of race, gender, religion, sexual orientation, responsibilities for dependents, age, physical/mental disability or offending background.

Recruit2Schools has a written policy on the recruitment of ex-offenders, which is made available to all DBS applicants at the start of the recruitment process.

Recruit2Schools actively promotes equality of opportunity for all with the right mix of talent, skills, and potential and welcomes applications from a wide range of candidates, including those with criminal records.

Recruit2Schools selects all candidates for interview based on their skills, qualifications and experience.

Recruit2Schools ensures that all staff of Recruit2Schools are involved in the recruitment process have been suitably trained to identify and assess the relevance and circumstances of offences.

Recruit2Schools also ensures that they have received appropriate guidance and training on the relevant legislation relating to the employment of ex-offenders, e.g. the Rehabilitation of Offenders Act 1974.

At interview, or in a separate discussion, Recruit2Schools ensures that an open and measured discussion takes place on the subject of any offences or other matter that might be relevant to the position. Failure to reveal information that is directly relevant to the position sought could lead to withdrawal of an offer of employment/assignment.

Recruit2Schools makes every subject of a criminal record check submitted to DBS aware of the existence of the code of practice and makes a copy available on request.

Recruit2Schools undertakes to discuss any matter revealed on a DBS certificate with the individual seeking the position before withdrawing a conditional offer of employment.

## Disclosure and Barring Service and Update Service checks

Recruit2Schools requires all our work seekers to have an enhanced Disclosure and Barring Service (DBS) check which includes a check on the Children’s Barred List, where appropriate/required.

We view and take a copy of the physical and original DBS certificate and, with consent from the work seeker, carry out a status check on the DBS Update Service. We record details of the check and the date the check is undertaken on the work seeker’s file. If the Update Service check states that there is new information, we will require the work seeker to apply for a new DBS certificate before proceeding with their registration.

If a work seeker wishes to register with Recruit2Schools and they are not already on the Update Service, a new DBS check will be required, and we would encourage the work seeker to subscribe to the Update Service. If they do not subscribe to the Update Service, we will require a new DBS check to be undertaken at least once a year. More frequent checks may be required in certain circumstances, such as if required by a school/client or if we receive information about a work-seeker/candidate that requires us to carry out additional checks.

Recruit2Schools will undertake repeat status checks on the Update Service at least once a year, or more often if required by our clients, but no more than four times a year. We always obtain the work seeker’s consent to undertake a status check.

If the DBS check shows details of a conviction or caution, in line with The School Staffing (England) Regulations 2009[[2]](#footnote-2), we must email a copy of the DBS to the school.

Following the decision of the Department for Education to remove access to the stand-alone Barred List checking system for employment businesses from 1 April 2021, we cannot conduct this standalone check and we will not place any work seekers in a role without a full enhanced DBS check being completed. This check includes a Barred List check where required.

When reviewing a work seeker’s DBS certificate, Recruit2Schools will check that the certificate is for the Child Workforce only and status checks on the Update Service will only be for the Child Workforce. Unless the role being applied for involves regulated activity with both children and adults in accordance with the definition of Regulated activity contained in the Safeguarding Vulnerable Groups Act 2006, we will not accept a previously issued DBS that covers both adult and child workforces.

The definition of ‘work with adults’, as set out in the Police Act 1997 (Criminal Records) Regulations is narrower than the definition of ‘work with children’ and refers to providing personal care to the adult. It is, therefore, not always the case that we will be entitled to view information relating to the adult barred lists. If there is any uncertainty as to whether a particular role is eligible for a criminal record check, we can use the [DBS eligibility tool](https://www.gov.uk/find-out-dbs-check) and, if necessary, obtain guidance from the DBS.

If a particular role is not eligible for an enhanced check against both the child and adult barred lists, we must not proceed with the check and if the work seeker has an existing DBS certificate covering both the child and adult workforces, we will require them to undertake a new DBS for the child workforce only.

## Overseas Police Checks

All work seekers who have lived and worked in a single overseas country for six months or more in the last five years must provide an overseas police check. This will be done in accordance with the [Government Guidance](https://www.gov.uk/government/publications/criminal-records-checks-for-overseas-applicants) particular to each country. Anything else a candidate provides will not be accepted.

If the work seeker is unable to provide a police check from the relevant country (for example, if the relevant country does not provide police checks), Recruit2Schools may accept a statement of good conduct from the work seeker's previous employer within the relevant country. We would require the statement to include confirmation that, to the best of their knowledge, the work seeker has no criminal convictions and that they know of no reason why the work seeker should not work with children.

If we are unable to obtain a police check or a statement of good conduct, we will advise the school that we have been unable to obtain these and the reasons why in order for the school to advise us of any further checks they may require or carry out a risk assessment based on the information we have been able to obtain.

## Letter of professional standing for work seekers that have lived or worked overseas

For work seekers seeking teaching roles, which have lived or worked overseas, Recruit2Schools will request sight of a letter of professional standing issued by the professional regulatory authority in the country/countries where the individual worked. This check is completed to confirm the work seeker’s suitability for the role in line with Recruit2Schools obligations under the Conduct Regulations. We will obtain details of the Regulated bodies in the EU/EEA and Switzerland via the [Regulated Professions database](https://ec.europa.eu/growth/tools-databases/regprof/professions/generic) or for any other part of the world from [the UK Centre for Professional Qualification (UKCPQ)](https://cpq.ecctis.com/individuals/professionalstanding).

Where the letter cannot be obtained and all reasonably practicable steps have been taken to obtain it, Recruit2Schools will request that the work seeker to provide an alternative document which confirms their suitability for the role. This may be a letter of good standing from the head teacher in the school that they worked in or additional professional references. In such a case where the letter of professional standing cannot be obtained, Recruit2Schools may also refer to the Education Workforce Council for guidance on what other document/s might confirm suitability.

Recruit2Schools will then inform the client of the steps taken to comply with the suitability requirements which are set out in Regulation 22 of the Conduct Regulations.

## Online/social media checks

In accordance with the updated guidance in [KCSIE 221](https://assets.publishing.service.gov.uk/media/64f0a68ea78c5f000dc6f3b2/Keeping_children_safe_in_education_2023.pdf), Recruit2Schools will conduct an online search of a shortlisted candidate as part of our due diligence checks/ should this form part of a school’s recruitment policy. We will take into account any specific checks that form part of the school’s own online checks policy or procedure. We will inform all candidates that this will form part of the recruitment process prior to conducting a search and update our privacy policy and retentions policy accordingly.

## Qualifications and newly qualified teachers (NQTs)

Where the client, legislation or any professional body requires the work seeker to have a particular qualification or authorisation to work in the position offered by the client, we will obtain copies of original qualifications and authorisations, and these will be available to our clients upon request.

Work seekers being supplied into a teaching position must be qualified to teach. In addition to checking the qualifications, we will also check the teacher's qualified teacher status via the Education Workforce council website. We will check overseas qualifications via [UK ENIC](https://www.enic.org.uk/) the UK’s National Information Centre.

A qualified teacher who has been awarded QTS but who has not yet completed an induction period has to complete all sessions within 5 years from the award of the QTS. Recruit2Schools will ensure that a teacher who has not satisfactorily completed an induction period is eligible to carry out short term supply work.

Wherever possible, we will work with schools and NQTs to find suitable induction placements. NQTs must complete 3 school terms and this can be done by working 380 sessions (a session is equivalent to either a morning or an afternoon of teaching).

## Teacher Regulation Agency / Education Workforce Council (Wales)

Recruit2Schools will undertake checks via the [Education Workforce Council](https://www.myewc.wales/en/) (EWC), to check a teacher’s UK qualified teacher status to ensure that qualification certificates are genuine and that there are no prohibitions or sanctions imposed against the work seeker. We will retain a screen print on the teacher’s file as a record of these checks.

## Referrals

Recruit2Schools as an employment business is a 'personnel supplier' and has a legal requirement under the **Safeguarding Vulnerable Groups Act 2006** to refer information to the DBS about individuals who have either harmed, or placed at risk of harm, a child or vulnerable adult.

Where Recruit2Schools supplies or introduces a work seeker to a client, and the client subsequently removes the work seeker from carrying out ‘regulated activity’ because the client believes that the person has engaged in ‘relevant conduct’ or the ‘harm test’ is satisfied, Recruit2Schools must provide information to the DBS about this matter. Additionally, if Recruit2Schools decides to withdraw our services from the work seeker because we believe that the work seeker engaged in ‘relevant conduct’ or that the ‘harm test’ is satisfied, we must provide information to the DBS about this.

‘Relevant conduct’ is defined as:

* Conduct which endangers a child or vulnerable adult or is likely to endanger a child or vulnerable adult,
* Conduct which, if repeated against a child or vulnerable adult would endanger or would be likely to endanger him,
* Conduct involving sexual material relating to children (including possession of such material),
* Conduct involving sexually explicit images depicting violence against human beings,
* Conduct of a sexual nature involving a child or vulnerable adult.

Recruit2Schools a duty to refer information to the DBS if the ‘harm test’ is satisfied, i.e. if Recruit2Schools thinks that that the person may:

* Harm a child or vulnerable adult,
* Cause a child or vulnerable adult to be harmed,
* Put a child or vulnerable adult at risk of harm,
* Attempt to harm a child or vulnerable adult,
* Incite another to harm a child or vulnerable adult.

To ensure compliance with the DBS referral rules, we have processes in place to ensure that all staff are aware of the legal duty to make a DBS referral where necessary and know the process for doing so.

##  Fitness to teach.

Recruit2Schools will ask all work seekers to advise us of any health or disability issues that they believe are relevant to the role and which make it difficult for them to carry out functions that are essential to the role.

If a declaration is made, with consent from the work seeker, we will obtain confirmation from the work seeker’s doctor that the work seeker is fit to teach. If we are unable to obtain this confirmation, we will not proceed with the registration.

# Other checks

## Continued suitability

In order to ensure that all work seekers registered with Recruit2Schools meet the safeguarding and suitability requirements on an ongoing basis, at least once a year we will conduct status and Education Workforce Council checks (subject to any shorter period imposed by a client).

Where a work seeker has not worked with us for a period of three to six months, we will conduct status and Teacher Regulation Authority/Education Workforce Council checks and obtain an additional reference/s to cover the period in question.

Where a work-seeker has not worked with us for over six months the registration process will be repeated in full.

I have read and understood this policy and agree to abide by its terms.

Signed ……………………………………….

Dated ……………………………………….

1. Please note that it is a requirement of the REC Audited Education Criteria to see original ID documentation. [↑](#footnote-ref-1)
2. Regulation 18(1)b The School Staffing (England) Regulations 2009 [↑](#footnote-ref-2)