



Safer Recruitment Policy

This policy has been adopted by all
schools within The Golden Thread
Alliance

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Contents

1.	Policy Statement	3
2.	Scope	4
3.	Adoption Arrangements and Date	4
4.	Equal Opportunities Statement	4
5.	Prevent	4
6.	Prior to Advertising	4
7.	Job Description	5
8.	Person Specification	5
9.	Advertising	5
10.	Applications	6
11.	Shortlisting	6
12.	References	7
13.	Interview and Selection	9
14.	Pre-employment checks	9
	14.1 Right to Work	10
	14.2 DBS and Barred List Checks	11
	14.3 Regulated Activity	11
	14.4 Prohibition of Teachers	12
	14.5 Section_128_Management_Checks	12
	14.6 Overseas Checks	13
	14.7 Proof of Qualifications	13
	14.8 Follow Up References	14
	14.9 Pre-employment Medical History Questionnaire	14
	14.10 Childcare Disqualification	14
15.	Withdrawal_of_Offers	15
16.	Single Central Record	15
17.	Complaints	15
18.	Induction	15
19.	Record Keeping	15
20.	Existing Staff	16
21.	Agency and third-party staff (supply staff)	16
22.	Contractors	16
23.	Trainee/Student Teachers	17
24.	Volunteers	17
25.	Members, Trustees and Governors	17
26.	Confidentiality and Data Protection	17

1. Policy Statement

This policy has been adopted by the Board of Trustees of The Golden Thread Alliance to provide a policy framework for the recruitment and selection of staff to all posts within the approved staffing structure of The Golden Thread Alliance. The Golden Thread Alliance is committed to safeguarding and promoting the welfare of children and young people and requires all staff, volunteers, agency and third-party staff to share and demonstrate this commitment.

The Board of Trustees of The Golden Thread Alliance fully understand their responsibilities in ensuring that recruitment procedures are free from unlawful discrimination in line with the Equality Act 2010. The Board of Trustees also fully appreciate the importance of fair, open and effective procedures to enable The Golden Thread Alliance to recruit people with the right skills, aptitudes and attitudes.

The Board of Trustees of The Golden Thread Alliance will ensure compliance with all relevant legislation, recommendations and guidance including the statutory guidance published by the Department for Education (DfE), DfE Keeping Children Safe in Education (KCSIE), DfE Working Together to Safeguard Children-2018, Disqualification under the Childcare Act (DUCA) 2006 and related updates, the Prevent Duty Guidance for England and Wales 2015 (the Prevent Duty Guidance) and any guidance or code of practice published by the Disclosure and Barring Service (DBS).

The Board of Trustees of The Golden Thread Alliance fully understand their responsibilities in managing the personal data of job applicants in line with the General Data Protection Regulations (GDPR).

All staff, Board of Trustees and volunteers are expected to share a commitment to safeguard children and vulnerable groups and, as part of that commitment, follow 'Safer Recruitment' guidance in line Keeping Children Safe in Education – statutory guidance for schools and colleges.

As part of our commitment to safeguarding children and vulnerable groups, Enhanced DBS checks and/or Barred List checks on all posts must be carried out where they are required.

All staff and Board of Trustees involved in recruitment and selection decisions are required to work in ways that are entirely consistent with this policy at all times.

The Golden Thread Alliance will ensure that all selection panels will comprise at least one member who has successfully completed safer recruitment training. In addition, The Golden Thread Alliance will ensure that training is provided for all staff and Board of Trustees involved in the recruitment and selection of staff and that it is appropriate to their role. This forms part of the School Staffing (England) Regulations 2009.

Guidance Note:

More information about posts which require an Enhanced DBS and how to check the Barred List can be found at www.gov.uk/disclosure-barring-service-check.

2. Scope

This Policy applies to all employees, along with volunteers, contractors and agency staff working within The Golden Thread Alliance where appropriate.

3. Adoption Arrangements and Date

This policy was adopted by The Golden Thread Alliance in Autumn 2022 and supersedes any previous Recruitment Policy.

This policy will be reviewed by The Golden Thread Alliance annually or earlier to reflect any changes in guidance or notable incident. This will involve consultation with the recognised unions where necessary.

4. Equal Opportunities Statement

The Golden Thread Alliance is committed to ensuring that each stage of the recruitment and selection process is accessible to all. We will review the recruitment policy and procedure regularly to ensure that it takes account of the Equality Act 2010 and does not discriminate against applicants on the grounds of race, religion or belief, disability, age, pregnancy and maternity, gender reassignment, marriage and civil partnership, sex or sexual orientation.

5. 'Prevent'

The Golden Thread Alliance has a duty under section 26 of the Counter-Terrorism and Security Act 2015 ("the CTSA 2015") to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty.

In carrying out its obligations under 'Prevent' The Golden Thread Alliance will assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. The Golden Thread Alliance will not discriminate on the grounds of race, colour, nationality, ethnic or national origin, religion or religious belief, sex or sexual orientation, marital or civil partnership status, disability or age.

6. Prior to Advertising

When a vacancy occurs the Headteacher/Head of School will review the need for the post and consider all options (internal and external) before deciding that there is a need to recruit. If there is a need to recruit, the job description and person specification should be reviewed prior to seeking the approval of the Chief Executive Officer and the Chief Operating Officer to commence recruitment.

Consideration should also be given to the working hours and contractual arrangements for each post to ensure that posts are open to applicants wishing to work on a part-time or job-share basis where possible and practical.

7. Job Description

The job description is a statement of purpose and scope and defines both the job role and expectations. It will:

- Summarise the job purpose/impact
- Set out key responsibilities and accountabilities
- Set out reporting and line management arrangements

An up-to-date job description and person specification will be available for each vacancy advertised.

Managers will refer to the Professional Standards for Teachers and to the Teachers' Pay and Conditions Document (which sets out the expected attributes of Main Scale, Post Threshold, Advanced Skills and Excellent Teachers) when creating job descriptions for teaching posts.

All job descriptions should clearly state to what extent the role will involve contact with children, whether they will be engaged in regulated activity relevant to children, and the post holder's responsibility for promoting and safeguarding the welfare of children and young people.

8. Person Specification

The person specification is a description of the qualifications, experience, knowledge, skills, competencies and other attributes of the ideal person to fill the role.

It can classify each attribute as either 'Essential' to do the job or as a 'Desirable' attribute for the post holder to have and indicate how each attribute will be assessed e.g. application form, interview, reference, test etc.

All attributes should be measurable and quantifiable and should take care not to unlawfully discriminate against particular groups of people, either directly or indirectly.

9. Advertising

All vacant posts will be advertised in a fair, open and honest manner and will be advertised by means of The Golden Thread Alliance website or internal email as a minimum. In most cases, vacant posts will be advertised externally. All adverts need to ensure that shortlisted candidates are informed that they will be subject to an online check, following the changes to KCSIE.

All adverts should include the safeguarding responsibilities of the post as set out in the job description and person specification and state whether the post is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. This means that when applying for certain jobs, activities, some spent convictions and cautions are 'protected', so they do not need to be disclosed to employers, and if they are disclosed, employers cannot take them into account. Guidance about whether a conviction or caution should be disclosed can be found on the [Ministry of Justice website](#).

To demonstrate to potential job applicants our commitment to safeguarding and the welfare of children, the following statement should be included on any relevant advertisements and documentation sent out to applicants:

The Golden Thread Alliance and all its personnel are committed to safeguarding and promoting the welfare of the children. This post is subject to an Enhanced Disclosure Application to the Disclosure and Barring Service.

10. Applications

All applicants must complete the relevant application form in full to enable the panel to shortlist in a fair and objective manner. Applicants will no longer be asked to complete a separate Criminal Convictions Self Disclosure form as part of their application. Due to changes in the latest version of Keeping Children Safe in Education, this will be done at the shortlisting stage to ensure that processing of criminal data is targeted and proportionate. Please see 11. Shortlisting for more information.

The Golden Thread Alliance may reasonably decide to reject an application where incomplete and/or ambiguous information is provided. As stated in Keeping Children Safe in Education, applications by CV or letter alone will not be considered, and all applicants are required to sign and date their application.

The Golden Thread Alliance should include a statement in the application form, or elsewhere in the information provided to applicants, that it is an offence to apply for the role if the applicant is barred from engaging in regulated activity relevant to children. The Golden Thread Alliance should also provide a copy of the school's child protection policy and practices, and policy on employment of ex-offenders in the application pack or refer to a link on its website.

11. Shortlisting

Shortlisted candidates will be asked to complete a separate Criminal Convictions Self-Disclosure form and must be signposted to publicly available guidance and support on which cautions or convictions they must disclose and be given time to obtain advice. This information is available on the [Ministry of Justice website](#).

Candidates will be required to declare any unspent convictions or conditional cautions, any spent adult cautions (simple or conditional) or convictions that are not protected as defined by either the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 as amended in England, Scotland and Wales, or the Rehabilitation of Offenders (Northern Ireland) Order 1978 as amended in Northern Ireland.

Candidates will also be asked to declare:

- Whether they have ever been known to any Children's Services department or Police as being a risk or potential risk to children.
- Whether they have ever been the subject of any investigation and / or sanction by a professional body due to concerns about their behaviour towards children.
- Whether they have any overseas convictions; and
- Whether they are included on the DBS Children's Barred List
- If the role involves working with pupils under 5 and/or pupils under 8 in wraparound care whether they have any orders relating to the care of children as set out in schedule 1 of the Childcare Disqualifications Order (2018).

Failure to declare relevant information may disqualify the candidate from the appointment and, if appointed, may render the individual liable to immediate dismissal without notice.

A new addition to Keeping Children Safe in Education 2022 is for shortlisted candidates to be subject to an 'online' search. Applicants should have been made aware of this requirement prior to or at the time of application. Such checks can be carried out via online search engines and social media platforms; however, this is only with regards to information that is within the public domain. The aim of the search is to ensure there is no information held in the public domain relating to the candidate that would make the school question their suitability to work with children and/or could harm the reputation of the school should the candidate become part of the school's workforce. The search can be carried out by a member of staff who is not part of the recruitment process, with any information collated being recorded and passed to the recruitment panel. The candidate should be asked to explain any findings by the recruitment panel either prior to (if deemed appropriate), or during the interview process. The recruitment panel will then carry out a risk assessment as required. This process will be carried out for all shortlisted staff regardless of the job role being applied for.

All applicants are required to sign and date the declaration to confirm that the information they have provided is true. Where there is an electronic signature, the shortlisted candidate should physically sign a hard copy of the application at the point of interview.

It is recommended that at least two people are involved in the shortlisting process, one of whom should be the line manager.

All shortlisting decisions will be made with clear reference to the skills and qualities set out in the person specification.

The equal opportunities monitoring form will be separated from the main application form to reduce any likelihood of conscious or unconscious bias.

12. References

In order to comply with Keeping Children Safe in Education, it is the policy of The Golden Thread Alliance that all references will be obtained, and concerns resolved, before confirming an appointment. This will be done either by letter seeking to verify the skills, experience, competencies and employment history of the applicant, or by a standard reference form.

It is The Golden Thread Alliance's practice, with the consent of the applicant, to take up references before interview for all posts. If applicants have indicated that they do not consent to references being sought prior to interview, further information should be sought, and agreement obtained where possible.

On receipt, references will be checked to ensure that all specific questions have been answered satisfactorily. Any discrepancies or anomalies should be noted and addressed during the applicant's interview.

Specific questions should be included to explore the applicant's suitability to work with children and, if the referee has any concerns, they should be asked to give their reasons.

In order to comply with the Equality Act 2010, reference requests sent prior to an offer of employment will not request details of attendance or absence however; further information will be requested and compared with the medical questionnaire following the applicant's acceptance of a conditional offer of employment – see 14 below.

Applicants will be required to specify the details of two referees, one of which should be the current or most recent employer and completed by Senior person. References will only be obtained directly from the referee: testimonials or open references (those addressed 'To whom it may concern') will not be considered. Referees will be provided with a copy of the job description and person specification to assist them in their response.

References for staff working in an education setting will be sought from the Headteacher where possible or another Senior Leader who is able to provide accurate information in respect of disciplinary action. In other settings, it would be appropriate to seek a reference from the line manager of the applicant.

Where a candidate is not currently working in a school or childcare setting but has done so in the past, one reference should be from their most recent children's workforce employer in line with Safer Recruitment guidelines.

We reserve the right to request that the applicant provides alternative referees where the initial referees are deemed inappropriate for our purposes e.g. where the current or most recent employer is not provided.

We will seek to confirm whether the candidate has been subject to any formal disciplinary procedures within the last two years and to establish any details, outcomes or 'live' sanctions which are in place.

We will compare information on a candidate's application form with that in the reference to identify any inconsistencies and take up any discrepancies with the candidate.

In cases where there have been disciplinary concerns which involved children or safeguarding that have been substantiated, the referee will be required to confirm details.

In accordance Keeping Children Safe in Education, cases in which an allegation is proven to be false, unsubstantiated or malicious should not be included in employer references.

When recruiting to teaching posts we will seek to confirm whether candidates have been subject to formal capability proceedings in the past two years as part of our appointment process.

In the case of recruitment to all other posts we will ask referees to confirm whether candidates have been subject to formal capability proceedings in the past two years as part of our appointment process.

13. Interview and Selection

The Golden Thread Alliance is committed to ensuring that all interviewees are assessed according to their ability to meet the criteria of the job description and person specification and to fulfil their obligation regarding keeping children safe.

Applicants may have indicated on their application form that they have a disability and, in order to promote fairness and to meet our obligations under the Equality Act 2010, the letter of invitation will encourage applicants to contact The Golden Thread Alliance if they require any adjustments to enable them to attend the interview.

Candidates are required to bring evidence of relevant qualifications to the interview where the original documents must be checked, and signed and dated copy retained. When attending for interview, each candidate should be asked to sign a copy of their application form and their self-disclosure form in the presence of the person undertaking the document and identity checks

The interview panel will include at least one member who has undertaken safer recruitment training in accordance with the School Staffing (England) Regulations 2009 and should not include an employee where one of the applicants is a relative, partner or close friend. The interview will include questions in relation to safeguarding.

The panel will take notes during the interview to enable a scoring matrix to be completed and, at the conclusion of the interviews; the panel will consider each of the candidates against the criteria for the post before reaching their decision.

Specifically, when interviewing candidates, the panel:

- Probe any gaps in employment, or where the candidate has changed employment or location frequently
- Explore any potential areas of concern to determine the candidate's suitability to work with children
- Record all information considered and decisions made

14. Pre-employment Checks

All offers of employment will be conditional on the successful completion of the pre-employment checks listed below and will include confirmation of salary, start date and any information that the successful applicant needs to provide before commencing employment e.g. DBS form and pre-employment questionnaire.

All offers of employment will be subject to and conditional upon:

- Enhanced DBS check
- DBS Barred list check where applicable (i.e. if working in regulated activity)
- Verification of identity including Date of Birth
- Verification of entitlement to work in the UK
- Verification of any relevant qualifications including checking the TRA's Employer Access Service to verify Qualified Teacher Status
- Receipt of 2 satisfactory references
- Satisfactory pre-employment health clearance
- Prohibition checks for those in teaching work and those with previous teaching experience (including unqualified teachers, HLTAs, ATs etc.)
- A section 128 Prohibition from Management check for all staff employed in management positions, members, trustees and local governors. Whilst they are not employees, from September 2019, Keeping Children Safe in Education also recommends that maintained school governors have section

- 128 checks because a section 128 direction prohibits someone from serving as a maintained school governor.
- Overseas checks as appropriate including-
 - Obtaining an enhanced DBS certificate with barred list information even if the teacher has never been to the UK.
 - Criminal records checks for overseas applicants – Home Office guidance can be found [here](#) and for teaching positions From 1st January 2021, the Teacher Regulation Agency will no longer maintain a list of EEA teachers with sanctions.
 - Criminal records checks for overseas applicants - Home Office guidance can be found on GOV.UK; and for teaching positions
 - Obtaining a letter (via the applicant) from the professional regulating authority in the country (or countries) in which the applicant has worked confirming that they have not imposed any sanctions or restrictions, and or that they are aware of any reason why they may be unsuitable to teach.
 - Disqualification checks under the 2018 Childcare Disqualification Regulations for individuals employed to work in reception classes, or in wraparound care for children up to the age of 8 in schools providing childcare.
 - Verification of physical and mental fitness to carry out their work responsibilities.
 - Online search to identify if there are any concerns which would lead the school to question the candidate’s suitability to work with children, which will have been discussed with the candidate either before or at the interview

If these are not satisfactory an offer of employment may be withdrawn or where an individual has commenced work, employment may be terminated.

14.1 Right to Work

In order to comply with the Asylum and Immigration Act 1996 – Prevention of Illegal Working – interview candidates will be asked to bring certain documentation to the interview which shows their eligibility to work in the UK. No offer of employment can be made unless one of the original documents listed on the Home Office Right to Work Checklist is produced.

The candidate’s original documents must be checked, and a signed and dated copy retained in line with The Golden Thread Alliance retention policy. Documents relating to unsuccessful candidates will be retained with the interview papers and destroyed six months from the date on which the position was offered and accepted by the successful candidate.

The Home Office Right to Work Checklist shows the acceptable identity documentation as currently defined by the Home Office and further information on establishing an individual’s right to work can be found at:

<https://www.gov.uk/government/publications/right-to-work-checks-employers-guide/an-employers-guide-to-right-to-work-checks-31-august-2021-accessible-version>

14.2 DBS and Barred List Checks

All those directly employed by Schools and Academies in paid positions are required to obtain an enhanced Disclosure and Barring Service (DBS) check.

It is an offence to employ, in a school or academy, an individual who is barred from working with children. A check against the Children's Barred List will be requested as part of the enhanced DBS Disclosure for all employees working in regulated activity i.e. having unsupervised, frequent, or intensive contact with children.

It is The Golden Thread Alliance's practice that individuals obtain a satisfactory enhanced DBS check before commencing work. In exceptional circumstances where the applicant is required to commence work before the full disclosure certificate is received, where working in regulated activity, a barred list check must be carried out before employment commences and a risk assessment and supervision must be in place until a satisfactory DBS check is obtained.

The Golden Thread Alliance will obtain an enhanced DBS certificate (including barred list information) for all volunteers who are working in regulated activity.

The Golden Thread Alliance will obtain an enhanced DBS certificate for all Members, Trustees and Local Governors. A check against the Children's Barred List will only be carried out for Members, Trustees and Local Governors if they will be engaging in regulated activity in addition to their governance duties.

For existing staff, The Golden Thread Alliance will carry out new checks when an individual working within the Trust moves from a post that was not regulated activity with children into work which is considered to be regulated activity with children or where there has been a break in service of 12 weeks or more or there are concerns about an individual's suitability to work with children.

In cases where we are notified that a DBS check is positive for criminal convictions, cautions, warnings etc, the contents of the certificate will be discussed with The Golden Thread Alliance's Head of HR.

14.3 Regulated Activity

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. HM Government has produced a Factual note on regulated activity in relation to children: scope. Regulated activity includes:

a) teaching, training, instructing, caring for (see (c) below) or supervising children if the person is unsupervised, or providing advice or guidance on physical, emotional or educational well-being, or driving a vehicle only for children;

b) work for a limited range of establishments (known as 'specified places', which include 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.² Some activities are always regulated activities, regardless of 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 with eating and drinking for reasons of illness or disability or in connection with toileting, washing, bathing and dressing for reasons of age, illness or disability;³
- health care means care for children provided by, or under the direction or supervision of, a regulated health care professional.

²The Safeguarding Vulnerable Groups Act 2006 provides that the type of work referred to at (a) or (b) will be regulated activity if “it is carried out frequently by the same person” or if “the period condition is satisfied”. Paragraph 10 of Schedule 4 to this Act says the period condition is satisfied if the person carrying out the activity does so at any time on more than three days in any period of 30 days and, for the purposes of the work referred to at (a), apart from driving a vehicle only for children, it is also satisfied if it is done at any time between 2am and 6am and it gives the person the opportunity to have face to face contact with children.

³It is not intended that personal care includes such activities as, for example, parent volunteers helping with costumes for school plays or helping a child lace up football boots.

14.4 Prohibition of Teachers

The Golden Thread Alliance will verify that anyone appointed or who may on occasions be required to carry out teaching work (including TA’s, HLTA’s and unqualified teachers) has not been prohibited from doing so by the Secretary of State in accordance with the Teachers’ Disciplinary (England) Regulations 2012. All those in teaching work, or those with previous teaching experience, will require a prohibition check. Teaching staff will be checked on the Teacher Regulation Agency self-service portal (formerly known as the Employer Access Service) to ensure that they have the required teaching qualifications, have successfully completed statutory induction where it is necessary i.e., for teachers who obtained QTS after May 1999, and have not been prohibited from teaching.

A person who is prohibited must not be appointed to a role that involves teaching work.

14.5 Section 128 Management Checks

Section 128 directions are made by the Secretary of State under section 128 of the Education and Skills Act 2008, barring individuals from taking part in the management of Independent schools, Academies and Free Schools. The Golden Thread Alliance will undertake a section 128 check for those taking up management positions to ensure they are not prohibited under the provisions. This includes Board of Trustees, Directors, Members, Trustees and Local Governors.

14.6 Overseas Checks

In accordance with Keeping Children Safe in Education, The Golden Thread Alliance will ensure that individuals who have lived or worked outside the UK will undergo the same checks as all other staff in schools. This includes obtaining (via the applicant) an enhanced DBS certificate (including barred list information, for those who will be engaging in regulated activity), even if the individual has never been to the UK.

In addition, The Golden Thread Alliance will make any further appropriate checks so that any relevant events that occurred outside the UK can be considered. The same approach for any individuals who have lived or worked outside the UK regardless of whether or not it was in an EEA country or rest of the world will be applied. This should include:

- obtaining a criminal record check for time spent abroad where by reason of the individual's living or having lived overseas, obtaining an enhanced DBS certificate is not sufficient to establish his or her suitability to work and/or where the individual has lived outside of the UK for a period of more than 6 months in the last 5 years. Further information on how to obtain such a check can be found at: <https://www.gov.uk/government/publications/criminal-records-checks-for-overseas-applicants/guidance-on-the-application-process-for-criminal-record-checks-overseas>
- for teaching positions obtaining a letter (via the applicant) from the professional regulating authority in the country (or countries) in which the applicant has worked confirming that they have not imposed any sanctions or restrictions, and or that they are aware of any reason why they may be unsuitable to teach. Applicants can find contact details of regulatory bodies in the EU/EEA and Switzerland on the Regulated Professions database. Applicants can also contact the UK Centre for Professional Qualifications who will signpost them to the appropriate EEA regulatory body.

The overseas checks will be carried out in addition to obtaining an enhanced DBS check as the DBS check alone is not sufficient to establish the candidate's suitability to work with children.

Since 6 April 2017 for all Tier 2 Visa applicants it is a requirement that they must provide a criminal record certificate from any country where they have lived for 12 months or more (whether continuously or in total) in the last 10 years.

14.7 Proof of Qualifications

Proof of qualifications will be checked to ensure that they match with the candidate's application form. The name of the qualification, awarding institution, date of qualification and candidate name will be checked. A signed and dated copy of the certificate will be retained as evidence of when the check was carried out, and by whom.

In the case of teachers, Qualified Teacher Status (QTS) will be checked via the Teacher Regulation Agency's Self Service Portal at <https://teacherservices.education.gov.uk/>

In the event of any concerns regarding the validity of the qualification, a candidate may be required to obtain confirmation or clarification in writing from the exam board or awarding institution.

14.8 Follow-up References

Following a written conditional offer of employment to the successful candidate, a supplementary reference request will be sent to their original referees. This is an opportunity to request information about sickness absence and attendance records which cannot be requested prior to an offer of employment in order to comply with the Equality Act 2010.

The offer of employment is conditional of both parts of the reference being satisfactory.

14.9 Pre-employment Medical History Questionnaire

The Golden Thread Alliance will require all successful applicants to complete a medical history questionnaire to verify their medical fitness. There is also a requirement for schools to ensure that staff appointed to teaching posts have the necessary physical and mental fitness to teach under the Education (Health Standards) (England) Regulations 2003.

Completed medical history questionnaires will be considered in conjunction with the follow-up references which specifically explore sickness absence and attendance issues and, where appropriate, further advice about fitness to carry out a role will be sought from Occupational Health. In order to comply with the Equality Act 2010, reasonable adjustments will be made to enable a candidate to take up their role.

In circumstances where the candidate is assessed as medically unfit to carry out the role, or where it is not possible to make reasonable adjustments, an offer of employment may be withdrawn.

14.10 Childcare Disqualification

The Golden Thread Alliance will ensure that staff, who work in childcare provision, or who are directly concerned with the management of such provision, will have the appropriate checks carried out to ensure that individuals are not disqualified under the Childcare (Disqualification) Regulations 2018. The Childcare Disqualification check only applies to staff engaged to provide early years childcare i.e. staff working directly with children under 5 years of age or those providing 'wrap around' care with children up to 8 years of age.

Checks will include: -

- Completion of a self-disclosure form prior to interview that asks whether the individual has any orders relating to the care of children as set out in schedule 1 of the Childcare Disqualifications Order (2018).
- Requesting an up-to-date enhanced DBS certificate (with barred list check for those who will engage in regulated activity)
- Cross referencing the results of the checks with the list of relevant offences at [Disqualification under the Childcare Act 2006 - statutory guidance Appendices \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/674427/Disqualification_under_the_Childcare_Act_2006_-_statutory_guidance_Appendices.pdf) that would disqualify someone.

15. Withdrawal of Offers

In the event that the pre-employment checks are unsatisfactory, or where the identity, qualifications or right to work in the UK of a successful candidate cannot be verified, The Golden Thread Alliance will consider withdrawing the conditional offer of employment. Where the successful candidate has started in post and information becomes available which would have caused the offer to be withdrawn, employment may be terminated. In these circumstances advice should be sought from The Golden Thread Alliance's HR team.

16. Single Central Record

In accordance with the terms of the School Staffing (England) Regulations (as amended), The Golden Thread Alliance will retain details of recruitment and vetting checks undertaken in a Single Central Record (SCR). Details of each individual academy will be recorded on a separate Single Central Record that is accessible for inspection. This data will be collated, used and stored and deleted in line with GDPR.

17. Complaints

An individual who feels that their treatment during the recruitment and selection process is unfair may raise a formal complaint. This can be done by writing to the Headteacher/Head of School/Chief Executive Officer/Chair of Trustees setting out the key points of their complaint. The complaint will be investigated in line with The Golden Thread Alliance's Complaints Procedure.

Existing employees of The Golden Thread Alliance should raise their concerns through the Grievance Procedure.

18. Induction

Induction is essential in ensuring that new employees are properly equipped for work, their role in the life of The Golden Thread Alliance and feeling part of The Golden Thread Alliance community.

The Golden Thread Alliance will put in place an induction programme for all staff joining The Golden Thread Alliance. This will vary taking into account previous experience and the nature of the role but will ensure that all staff and volunteers receive guidance on safe working practices and the safeguarding policies of The Golden Thread Alliance.

19. Record Keeping

Accurate and contemporaneous records including copies of application forms and interview notes will be kept throughout the process and will be retained for a minimum of six months from the appointment date in line with The Golden Thread Alliance's document retention schedule.

At the end of the appointment process all copied identity documentation (passport/birth certificate etc.) relating to unsuccessful candidates should be securely destroyed however, copies of application forms, interview, references, details of any online checks and any resulting risk assessments carried out and details of scoring should be retained for six months from the date that the post is offered and accepted. All personal data will be stored and destroyed in line with GDPR.

Please note that original and copy DBS forms must not be retained on personal files and that the details should, instead, be recorded on the Single Central Record. Details of any online checks do not need to be recorded on the Single Central Record.

20. Existing Staff

If The Golden Thread Alliance has concerns about an existing member of staff's suitability to work with children, The Golden Thread Alliance will carry out all the relevant checks as if the individual was a new member of staff. The Golden Thread Alliance will also do this if an

individual, moves from a post that was not regulated activity into work which is considered to be regulated activity.

In addition to this, Ofsted, the governing body for schools in the UK, stipulates that DBS should be renewed every 3 years at least. Therefore, staff will be contacted in advance of this to provide the necessary documents to enable The Golden Thread Alliance to complete the checks.

The Golden Thread Alliance will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- the harm test is satisfied in respect of that individual;
- the individual has received a caution or conviction for a relevant offence, or if there is reason to believe that the individual has committed a listed relevant offence; and
- the individual has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left.

21. Agency and third-party staff (supply staff)

The Golden Thread Alliance will obtain written notification from any agency, or third party organisation they use that the organisation has carried out the checks (in respect of the enhanced DBS certificate, written notification that confirms the certificate has been obtained by either the employment business or another such business), on an individual who will be working at The Golden Thread Alliance that The Golden Thread Alliance would otherwise perform.

Where the position requires a barred list check, this must be obtained by the agency or third party prior to appointing the individual. The Golden Thread Alliance will also check that the person presenting themselves for work is the same person on whom the checks have been made.

22. Contractors

The Golden Thread Alliance will ensure that any contractor, or any employee of the contractor, who is to work at The Golden Thread Alliance has been subject to the appropriate level of DBS check. Contractors engaging in regulated activity will require an enhanced DBS certificate (including barred list information). For all other contractors who are not engaging in regulated activity, but whose work provides them with an opportunity for regular contact with children, an enhanced DBS check (not including barred list information) will be required. In considering whether the contact is regular, it is irrelevant whether the contractor works on a single site or across a number of sites.

Under no circumstances should a contractor in respect of whom no checks have been obtained be allowed to work unsupervised, or engage in regulated activity. The Golden Thread Alliance are responsible for determining the appropriate level of supervision depending on the circumstances.

If an individual working at The Golden Thread Alliance is self-employed, The Golden Thread Alliance should consider obtaining the DBS check, as self-employed people are not able to make an application directly to the DBS on their own account.

The Golden Thread Alliance will always check the identity of contractors and their staff on arrival at The Golden Thread Alliance.

23. Trainee/Student Teachers

Where applicants for initial teacher training are salaried by The Golden Thread Alliance, we will ensure that all necessary checks are carried out. Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

24. Volunteers

The Golden Thread Alliance will:

- Carry out a risk assessment in determining suitability and when deciding the level of DBS check appropriate. We will retain a record of this risk assessment
- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity

25. Members, Trustees and Governors

All trustees, local governors and members will have an enhanced DBS check without barred list information.

They will have an enhanced DBS check with barred list information if working in regulated activity.

The chair of the board will have their DBS check countersigned by the secretary of state.

All proprietors, trustees, local governors and members will also be required to have a section 128 check (to check prohibition on participation in management under section 128 of the Education and Skills Act 2008).

26. Confidentiality and Data Protection

The Golden Thread Alliance recognises its obligations under the General Data Protection Regulation and associated legislation, and the rights of Employees with regards to the personal data held on them.

All records relating to the recruitment process will be gathered, processed, held and shared in accordance with the requirements of the General Data Protection Regulation and Data Protection Act.

Please refer to The Golden Thread Alliance's Data Protection Policy and Privacy Notice for further details.