

About this document

The safe recruitment of colleagues is the first step to safeguarding and promoting the welfare of our students and colleagues. GC Education and Skills is committed to safeguarding and promoting the welfare of all our students and prospective students. As an employer, GC Education and Skills expects all its colleagues including contractors, associates, agency workers and volunteers (hereafter referred to as colleagues) to share this commitment.

Summary of what you will find in this document

Within this document, you will gain an understanding of the aims and objectives of safer recruitment within GC; the role of the board and managers; the full recruitment process including advertising, interviews, pre-employment checks, the DBS process and what action to take if a DBS check contains a conviction and document retention.

Who it applies to

This guide applies to all colleagues who have a responsibility for recruiting or engaging the services of colleagues, contractors and associates, agency workers and volunteers.

Key Principles

The Safer Recruitment guide aims to help deter, reject or identify people who might pose a risk to students or are otherwise unsuited to work with them, by having appropriate procedures for appointing new employees.

Our recruitment policies and procedures aim to ensure:

- that the best possible people are recruited based on their merits, abilities and suitability for the position.
- that all job applicants are considered equally and consistently.
- that no job applicant is treated unfairly on any grounds including race, colour, nationality, ethnic or national origin, religion or religious belief, sex or sexual orientation, gender identity, marital or civil partner status, disability or age.
- compliance with all relevant legislation, recommendations and guidance including the statutory guidance published by the Department for Education (DfE), Keeping Children Safe in Education - September (KCSIE), 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).
- that GC Education and Skills meet its commitment to safeguarding and promoting the welfare of students and colleagues by carrying out all necessary pre-employment checks.

The recruitment and selection of colleagues will be conducted in a professional, timely and responsive manner and in compliance with current employment legislation, relevant safeguarding legislation and statutory guidance (including KCSIE September and Prevent Duty Guidance).

If any hiring manager or panel member involved in the recruitment process has a close personal or family relationship with an applicant, they must declare it as soon as they are aware of the individual's application. Once known they should avoid any further involvement in the recruitment and selection decision-making process.

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GC Education and Skills aim to operate this procedure consistently and thoroughly while obtaining, collating, analysing and evaluating information from and about applicants applying for job vacancies.

Roles/ Expectations/ Behaviours

Board responsibilities

- ensure that GC Education and Skills has effective policies and procedures in place for recruitment of all colleagues, in accordance with DfE guidance and legal requirements.
- monitor GC Education and Skills' compliance with them.

Manager responsibilities

- ensure that GC Education and Skills operates safe recruitment procedures and make sure that appropriate checks are carried out on all colleagues who work at GC Education and Skills'.
- monitor contractors and recruitment agency compliance with this document.
- promote the welfare of students at every stage of the procedure.

Recruitment and Selection process

Role Profile

A role profile is a key document in the recruitment process and must be finalised before taking any other steps in the process. It will clearly and accurately set out the duties and responsibilities of the job role.

Advertising

To ensure equality of opportunity, GC Education and Skills will advertise all vacant posts on the GC website and (where appropriate) external sites, to encourage as wide a field of applicants as possible.

All advertisements will make clear GC Education and Skills' commitment to safeguarding and promoting the welfare of students. The advertisement will set out clearly that the role requires a DBS check and that no applicant should apply should they be barred to work with the client group.

All documentation relating to applicants will be treated confidentially following the General Data Protection Regulation (GDPR).

Application Process

GC Education and Skills uses its own application process and is supported by an applicant tracking system (Hireserve). This requires applicants to apply via the Applicant Tracking System . Should the candidate be shortlisted the internal recruitment team will contact the applicant should they have any gaps in employment. This information will be provided to the hiring manager for further probing at the interview.

It is unlawful for GC Education and Skills to employ anyone who is barred from working with children and it is a criminal offence for any person who is barred from working with children to apply for a position at GC Education and Skills. All applicants will be made aware that providing false information is an offence which could result in the application being rejected, or summary dismissal if the applicant has been selected, and referral to the appropriate 3rd party agency.

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Ban the Box

Education and Skills are committed to Ban the Box, this campaign aims to increase opportunities for people with convictions to compete for jobs. We're supporting the campaign by removing conviction questions at the application stage. However, all candidates who are offered a role are required to disclose confidentially any convictions, child protection investigations or disciplinary sanctions. GC Education and Skills will only ask applicants to self-disclose after accepting a conditional offer.

Conditional offers may be withdrawn should an applicant be deemed unsuitable to work with the client group.

Interviews

There will be a face-to-face interview in every case, and a minimum of two interviewers will see the shortlisted applicants. The interview process will explore the applicant's ability to carry out the role. It will enable the panel to explore any anomalies or gaps that have been identified to satisfy themselves that the chosen applicant can meet the safeguarding criteria.

For each role, interviewers will use a standard list of core questions, tailored for the role. This will always include at least one safeguarding question.

All applicants who are invited to an interview will be required to bring evidence of their identity, address and qualifications. Only original documents will be accepted and photocopies will be taken. Unsuccessful applicants' documents will be destroyed 6 months after the recruitment process.

No questions will be asked about health or medical fitness prior to any offer of employment being made, apart from any requirements that an applicant may have at interview.

References

All offers of employment will be conditional on the receipt of a minimum of references that are considered satisfactory by GC Education and Skills which cover the last 3 years of employment. One of the references must be from the applicant's current or most recent employer. If the current/ most recent employment does/ did not involve work with young people or adults at risk, then the second reference should be from the employer (if any) with whom the applicant most recently worked with young people or vulnerable adults. The referee should not be a relative. 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 for which they have applied and whether they have any reason to believe that the applicant is unsuitable to work with young people and vulnerable adults.

Any discrepancies or anomalies will be followed up where necessary. Direct contact will be made by telephone to verify the reference by the HR Service Desk Team.

GC Education and Skills does not accept open references "to whom it may concern", testimonials or references from relatives. Where references are addressed generically the HR Service Desk Team will contact the referee to verify the validity of the reference.

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All reasonable steps will be taken to obtain full references, however, there are some circumstances that arise which may mean GC Education and Skills are unable to. In those events, SLT will be asked to consider any gaps in references.

Offer of Appointment and New Employee Process

GC Education and Skills carries out several pre-employment checks in respect of all prospective employees.

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

- the agreement of a mutually acceptable start date and the signing of a formal contract that incorporates GC Education and Skills 's standard terms and conditions of employment.
- verification of the applicant's identity (if not previously been verified).
- the receipt of references satisfying the above detailed process.
- where the position amounts to "regulated activity" the receipt of an enhanced disclosure from the DBS which GC Education and Skills considers to be satisfactory and confirmation that the applicant is not named on the children's barred list, the adults' barred list or both (depending on the role being recruited). Enhanced disclosure shows any spent and unspent convictions, cautions, reprimands and final warnings.
- where the position being recruited to, does not require an enhanced DBS, a Basic or Standard level will be carried out, as per Pre-Employment Checks Position Register.
- Completion of the Health Questionnaire
- Satisfactory Social Media check
- verification of the applicant's right to work in the UK;
- any further checks which are necessary as a result of the applicant having lived or worked outside the UK; and
- verification of professional and academic qualifications which GC Education and Skills deems a requirement for the post, or which the applicant otherwise cites in support of their application (where not previously verified).

Whether a position amounts to "regulated activity" must therefore be considered by GC Education and Skills in order to decide which checks are appropriate. A full register of roles and their required DBS can be found and advice be sought through the Quality and HR Teams.

The Rehabilitation of Offenders Act 1974

The Rehabilitation of Offenders Act 1974 does not apply to positions that involve working with, or having access to, students aged under 18 (which is the case with all positions at GC Education and Skills). Therefore, any convictions and cautions that would normally be considered 'spent' must be declared, this will be done directly with the internal recruitment team when any conditional offer of employment is being made. Applicants will be made fully aware of the requirements throughout the recruitment and selection process.

DBS (Disclosure and Barring Service) Checks

As outlined above in the section "Offer of Appointment and New Employee Process", appropriate DBS checks are required for all new colleagues

Details regarding these checks and their expiry dates are retained on the Single Central Record, which is reviewed and audited routinely by the Managing Director, Head of Quality, and HR.

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Colleagues at GC Education and Skills are reminded of their responsibility to notify the Managing Director of any cautions or convictions that arise between these checks taking place.

DBS Certificate

Only in exceptional circumstances will a colleague be permitted to start employment without a DBS. This would need to be authorised by the Managing Director or another appropriate person in their absence, and a risk assessment will be put in place by an appropriate manager until the DBS certificate is obtained. No lone working in regulated activity is permitted until the DBS is returned.

Dealing with convictions

GC Education and Skills operates a formal procedure if a DBS Certificate is returned with details of convictions. Consideration will be given to the Rehabilitation of Offenders Act 1974 and also:

- Whether the information is legally allowed to be considered
- Whether the offence is relevant to the position applied for
- The seriousness of the offence(s)
- The age at the time of the offence(s)
- The length of time since the offence(s)
- Whether there is a pattern of offending behaviour
- The circumstances surrounding the offence(s), and the explanation(s) provided
- Whether circumstances have changed since

If relevant information (whether about previous convictions or otherwise) is volunteered by an applicant during the recruitment process, or obtained through a disclosure check, a Senior Leader Team member or the Managing Director will evaluate all of the risk factors above 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, GC Education and Skills 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.

Proof of identity, Right to Work in the UK and Verification of Qualifications and/or Professional Status

All applicants invited to attend an interview at GC Education and Skills will be required to bring their identification documentation (such as passport, birth certificate,) with them as proof of identity/eligibility to work in the UK in accordance with the Immigration, Asylum and Immigration Act 2006 and DBS identity checking guidelines.

Where an applicant claims to have changed their name by deed poll or any other means (e.g., marriage, adoption, statutory declaration) they will be required to provide documentary evidence of the change. In addition, applicants must be able to demonstrate that they have actually obtained any academic or vocational qualification required for the position and claimed in their application.

Social Media Check

This is a statutory requirement for schools, colleges and providers of further education, as set out in the KCSIE (Keeping Children Safe in education) guidance. These checks came into force in May 2023. Any colleagues who internally move within Skills will not have a check carried out.

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Checking Process

The social media check will be completed by a third-party provider and GC will receive a report which will indicate if any content is deemed a risk.

Where the panel deem that the individual is not suitable to continue within their role, the hiring manager must inform the HR Service Desk who will withdraw the offer.

If an individual does not consent to a social media check, the recruitment process is immediately ended, and any conditional offers are withdrawn.

In some circumstances the colleague may be asked to change security settings on accounts. Failure to do so may result in the conditional offer of employment being withdrawn.

Medical Fitness

GC Education and Skills will verify the medical fitness of anyone to be appointed to a post, after an offer of employment has been made but before the appointment can be confirmed.

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

GC Education and Skills are aware of its duties under the Equality Act 2010. No job offer will be withdrawn without first consulting with the applicant, obtaining medical evidence and considering reasonable adjustments.

Induction Programme

All new employees will be given an induction programme which will clearly identify GC Education and Skills policies and procedures, including our Safeguarding, Health and Safety, Equality and Diversity and Prevent policies, and make clear the expectations which will govern how colleagues carry out their roles and responsibilities.

All colleagues are required to complete all units of compulsory training as soon as practicable during induction.

Single Central Record Colleagues

In addition to the employment records kept on individual personnel files, a single central record of recruitment and vetting checks is kept. This is kept up-to-date and retained by the HR Department. The Single Central Record contains details of the following:

- all employees who are employed to work at GC Education and Skills;
- all employees who are employed on a self-employed basis whether employed directly or through an agency; and, in each case:
- confirmation of the receipt references or rational should this not have been possible
- confirmation of proof of ID and address
- their DBS certificate numbers and expiry dates
- verification of qualifications
- completion of compulsory training/reads on safeguarding and related topics

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Record Retention

GC Education and Skills is legally required to undertake the above pre-employment checks. Therefore, if an applicant is successful, GC Education and Skills 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.

Employment records are retained for the period as defined in the [Retention and Destruction Policy](#). Should there be a safeguarding concern on those records, their details and any subsequent discussions/referral arising as a result of the concern(s), will be retained with no end date. Only authorised colleagues have access to this information.

GC Education and Skills will retain all interview notes on all unsuccessful applicants for a period of 6 months, after which time the notes will be confidentially destroyed.

Ongoing Employment

GC Education and Skills recognises that safer recruitment and selection is not just about the start of employment but should be part of a larger policy framework for all colleagues. GC Education and Skills will therefore provide ongoing training and support for all colleagues, as identified through the PDR process.

Referrals to the DBS

Despite our best efforts to recruit safely, there may be occasions when allegations of serious misconduct or abuse against young people or vulnerable adults are raised. This guide is primarily concerned with the promotion of safer recruitment and details the pre-employment checks that will be undertaken prior to employment being confirmed. Whilst these are pre-employment checks, GC Education and Skills also has a legal duty to make a referral to the DBS in circumstances where an individual:

- has applied for a position at GC Education and Skills despite being barred from working with children or adults;
- has been removed by GC Education and Skills from working in regulated activity or has resigned prior to being removed, because they have harmed, or pose a risk of harm to, a child or a vulnerable adult.

Contractors and agency colleagues

Contractors engaged by GC Education and Skills must complete the same checks for their employees that GC Education and Skills is required to complete for its colleagues. GC Education and Skills requires confirmation that these checks have been completed before employees of the Contractor can commence work at GC Education and Skills.

Agencies who supply colleagues to GC Education and Skills must also complete the pre-employment checks which GC Education and Skills would otherwise complete for its colleagues. Again, GC Education and Skills requires confirmation that these checks have been completed.

Data protection

We process personal data collected during this procedure in line with GC's privacy notice. You should ensure you are familiar with the [Privacy Notice](#). If you require any further information, you should liaise with the Group Data Protection Officer (DPO) or your HR Business Partner, who may refer your query to the DPO.

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Internal Supporting documents and policies

- Role Profile
- Recruitment and Selection Policy and Managers Guide
- Reference form
- Gaps in employment form
- Health Questionnaire
- DBS Policy and Procedure
- Equality and Diversity Policy
- Recruitment and Selection policy – manager guide etc

The above policies are Group wide. This guidance document applies to Education and Skills only.

External Resources

- Keeping Children Safe in Education - September (KCSIE),
- Prevent Duty Guidance for England and Wales 2015 (the Prevent Duty Guidance)
- Disclosure and Barring Service (DBS) guide and code of practice.
- DDC

Available training

- Safer Recruitment training for Managers
- Recruitment and Selection training
- Introduction to Equality, Diversity and Inclusion training

Version Control

This guide will be monitored on an ongoing basis and will be reviewed annually and/ or in light of any relevant GC requirement or legislative changes. The current version of all GC policies are available on the intranet. To ensure employees are referring to the current version, GC recommend employees refrain from printing and storing copies.

Version	Date	Lead	Authoriser	Details of the change	Next review date
Version 1	September 2024	Rachel Davey	Rebecca Cronin	New guide	01 September 2025

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