



Safer Recruitment Policy

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Safer Recruitment Policy and Procedures

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Safer Recruitment Policy and Procedures

SAFER RECRUITMENT KEY FACTS:

There are seven steps to safer recruitment:

1. Safer Recruitment Training

NSPCC Safer Recruitment e-learning Online Portal *(to provide the interviewer with the context and knowledge to explore their safeguarding responsibility)*

2. Role Profile and Advertisements

Safeguarding commitment statement to be included in both Role Profile and Job Advertisement *(to deter unsuitable personnel)*

3. Scrutinising, Shortlisting and Interviewing

Application form *(to be used as main tool for scrutinising)*

Internet search *(to gather any public domain information)*

Gaps in employment history *(to be noted for further exploration)*

Taking up references *(to verify previous experience)*

Concerns from a reference *(to be noted for further exploration)*

Invitation to interview *(to prepare applicants for interview)*

Preparing for the interview *(Selection Process and Interview Panel)*

Verify identity

Verify professional qualifications

Interview *(Scope of Interview, Outcome and Regrets)*

4. Offer letter and Contract of Employment *(specific reference is made to professional expectations to safeguard the company)*

Terms and Conditions of Employment

Probation

Rehabilitation of Offenders *(UK only)*

Disciplinary and Performance Improvement Procedure

Standards and Policies:

Ofsted Framework *(England only)*

Welsh Government Guidance (revised) Professional Standards for Education Practitioners in Wales 020/2011

Safeguarding Declaration

5. Background Checks *(in addition to pre-interview checks, the following ensure the person is who they state they are and complies with our safeguarding requirements)*

References

Identity check

Right to Work

Enhanced Disclosure and Barred List Check

Overseas criminal records checks *(if applicable)*

Country of Origin check *(if applicable)*

Prohibition from Teaching check (including EEA Sanctions) *(if applicable)*

Prohibition from Management check (*if applicable*)

Social Media check

Medical fitness

6. Recording and Monitoring New Starters (*to evidence all background checks have been completed and suitably returned*)

SCR – updated for all new starters

New Starter Checklist (*to be completed and filed on personnel file*)

Risk Assessment Form (*to be completed and filed on personnel file*)

Annual Staff Declaration (*Safeguarding and Compliance Record*)

Change of Employment

7. Probationary Period including Induction

The attitude and expectations regarding safeguarding are clearly articulated including personal behaviours and reporting lines for any concerns

Annual Child Protection Training should be completed during this time

Assess performance, conduct and final suitability for working with children in your organisation before confirming permanent appointment

A. Purpose

A.1 The Safer Recruitment Policy explicitly details Sophia Technologies' position, standards and expectations associated with its commitment to safeguarding and promoting the welfare of children and expects all staff to share this commitment, wherever they work and in whatever role.

A.2 Sophia follows the UK Guidance on Safeguarding Children and Safer Recruitment in Education (2006), its replacement Keeping Children Safe in Education (September 2023), Disqualification under the Childcare Act (2006), Working Together to Safeguard Children (July 2018).

Applicability

A.3 The following policy and procedure must be used for the recruitment and selection of all staff throughout Sophia High School.

B. Definitions and Scope

B.1 This Safer Recruitment Policy sets out our safeguarding responsibilities as an organisation recruiting staff to work with students and also provides group-wide, consistent and best practice recruitment procedures.

B.2 This policy must be read by any member of staff who is actively involved in the recruitment and selection of staff or who has a lead role in the safeguarding/child protection of students. These members of staff are deemed to be part of the "Sophia Recruitment Community".

B.3 For compliance purposes, a signed copy of this policy should be retained in the personnel file for record-keeping purposes of anyone who is required to have read, understood and taken accountability for the contents of this document.

B.4 Safeguarding is an ongoing process and will continue throughout employment. Safer Recruitment is only the first step in the whole Safeguarding cycle and must be embraced as part of our wider commitment to Safeguarding and Child Protection.

C. Policy

C.1 Across Sophia High School we share a common objective to help keep students safe by contributing to:

- providing a safe environment for students to learn and
- taking appropriate action to keep them safe (where a risk is identified)

C.2 Achieving this objective requires systems designed to:

- prevent unsuitable people working with students
- promote safe practice and challenge poor and unsafe practice
- identify instances where there are grounds for concern and take appropriate action
- contribute to effective partnerships to provide services to students who may require third party intervention
- Create a culture and environment where staff feel comfortable, if appropriate, to discuss matters outside of work, which may have implications for the safeguarding of students in the workplace.

C.3 Sophia High School continually implements strategies to ensure the best people are employed. The *Seven Steps to Safer Recruitment* have been created to deter and prevent unsuitable personnel from applying and/or being recruited. In order to achieve the aim, it requires the recruiting team to adhere to the *Seven Steps to Safer Recruitment*.

C.4 Recruiting Managers and leaders must be clear about the expectations they place on staff, including where their relationships and associations both within and outside of the workplace (including online) may have implications for the safeguarding of students.

C.5 Due to the reliance on the recruiting team taking personal accountability, disciplinary action will be taken, which may include termination of employment, against any employee, who is found to have breached this policy.

Equal Opportunities

C.6 Our policy is to treat job applicants and employees in the same way regardless of their gender, marital status, age, race, sexual orientation, gender reassignment, religion, pregnancy/maternity or disability and the sole criteria for selection or promotion will be an applicant's suitability for the role.

C.7 In turn, we expect our staff to recognise and respect the many different racial groups, religious cultures and languages represented by the students who at use the Sophia Platform, in order to help them to develop positive attitudes to diversity and to equip them to prevent them from being drawn into extremism or terrorism.

C.8 We will aim to utilise the richness this brings to our organisation.

Levels of Responsibility

C.9 For Sophia Technologies appointments, it is the CEO / Chair of the Board responsibility to identify a vacancy, seek budgetary authority for the position and to produce a Role Profile/Job Description for the role. The recruitment and onboarding of teachers is handled by members of the Education Team.

C.11 Applicants or colleagues should never be informed of the outcome of the recruitment process until it has been completed.

Professional Standards

C.13 Strict confidentiality must be maintained at all times by those who participate in the recruitment process. Confidential documents containing applicant details, application form, interview notes, employment offers etc. must be securely filed away.

C.14 Declaration of close personal or financial relationships with any applicant must be made to the Recruiting Manager. Anyone in this category will not be allowed to participate in the recruitment decision (this excludes ordinary working relationships).

D. Related Policies, Guidelines and Forms

- Behaviour Policy
- Equality and Diversity Policy
- Code of Conduct and Acceptable Use Policy
- Preventing Extremism and Radicalisation Policy
- Safeguarding and Child Protection Policy and Procedure
- Online Safeguarding Policy
- Whistleblowing Policy
- SHS Employee Handbook

E. Procedure

(Step 1) Safer Recruitment Training

E.1 It is best practice for members of the Recruitment Community to have successfully completed Safer Recruitment Training and have obtained the Certificate in Safer Recruitment.

E.2 We believe training further strengthens and safeguards students by helping to deter and prevent abuse; as such this is also a mandatory requirement for all Sophia employees who have a lead role in the safeguarding/child protection of students.

E.3 The online training is currently available from the NSPCC eLearning Portal (content formally managed by the UK Department for Education) via;
<http://www.nspcc.org.uk/what-you-can-do/get-expert-training/safer-recruitment-education-course/>
and currently all members of the SLT, CEO, Director of Education, Executive Principal and Admissions have completed the NSPCC training in Safer Recruitment in Education.

(Step 2a) Role Profiles

E.4 Role Profiles, including the Person Specification should be reviewed for each new vacancy and must include the main duties and responsibilities specific to the needs of the role. It must also include a statement about the individual's responsibility for promoting and safeguarding the welfare of children s/he is responsible for, or comes into contact with, as below:

- To comply with safeguarding policies, procedures and code of conduct
- To demonstrate a personal commitment to safeguarding and student/colleague wellbeing
- To ensure that any safeguarding concerns or incidents are reported appropriately in line with policy
- To engage in safeguarding training when required.

(Step 2b) Advertisements

E.5 When advertising a role, either internally or externally, it is important to outline the requirements in terms of the duties and responsibilities, the experience/background needed, and the personal qualities sought. The advertisement should then be written to reflect these in a way that makes the position attractive to applicants, but also has sufficient benchmarks to dissuade those who clearly do not have the required skills from applying.

E.6 Sophia High School actively encourages internal moves and promotion, but also reserves the right to advertise externally in the quest to find the best person for the job.

E.7 Advertisements should always include the following abridged Commitment Statement which sets out Sophia's commitment to safeguarding children:

"Sophia High School is committed to safeguarding and promoting the welfare of children and young people and expects all staff, volunteers and other third parties to share this commitment. Safer recruitment practice and pre-employment background checks will be undertaken before any appointment is confirmed."

(Step 3) Scrutinising, Shortlisting and Interviewing

The Application Form

E.8 Head Office Applicants, both internal and external, must use Sophia's *Application Form* to apply for a vacancy in order to comply with the Safer Recruitment Policy. Prospective Staff complete their registration via the Sophia platform and are then required to complete the SHS Teacher Application Form. This ensures a common set of core data from all applicants is received. It is not good practice to accept a CV drawn up by the applicant in place of an Application Form because this will only contain the information they wish to present and may omit relevant details (however, CV's can be accepted in addition to an Application Form if the applicant feels it better illustrates their knowledge, skill and experience). All applicants for Sophia High School must use the School Application Form.

E.9 It is unacceptable for an applicant to be appointed in the absence of a fully completed signed Application Form. When an Application Form has been submitted electronically with only a typed name in the signature box, an applicant invited to attend an interview should be asked to sign the Application Form as part of the background compliance checks undertaken on the interview day or their first day of employment.

E.10 It is strongly advised that two people shortlist applicants to avoid bias of opinion or prejudice in the process.

Internet Search

E.11 Applicants should be subject to a basic internet/media search to help identify the applicant's online identity and determine whether there may be any reputational risk to Sophia based on comments made by or about them online. Applicants will be informed of this before the search is carried out. Any information requiring further consideration should be discussed with the applicant and noted on the summary report from the interview documenting the considerations made. Information relating to the personal protected characteristics of the applicant (e.g. their race or sexual orientation) will not be taken into account in considering their application.

E.12 Searches should cover all countries where the applicant has lived and/or worked to ensure a full picture of their past is captured.

Gaps in Employment History

E.13 All Application Forms should be scrutinised to ensure they are fully and properly completed and that the information provided is consistent and does not contain any discrepancies, including identifying any gaps in employment. Where there are gaps in employment, a note of this should be made and used in consideration of whether to short list the applicant. Together with obvious gaps in employment, the reasons for a history of repeated changes of employment without any clear career

or salary progression should be explored and verified. This can also include a mid-career move from a permanent role to supply teaching or temporary work.

Taking up References

E.14 Applicants working in direct contact with children, should give a minimum of two professional reference contacts on the *Application Form*. A key purpose of the reference is to verify the applicant's suitability to work with children. These reference contacts must, therefore, include the most recent employer, the most recent employment working with children (if different) and cover a minimum of 5 years work history. References should be sought on all short-listed applicants, including internal ones and should be from their present/previous Line Manager or a senior person within the organisation.

E.15 The recruitment manager must request all written references directly from the referee. Sophia does not accept an open reference as part of the recruitment process e.g. "to whom it may concern". A minimum of two returned references are required on each personnel file.

E.16 As a rule, character references are not acceptable; this includes references from relatives or people writing solely in the capacity of friends. If there is a good reason the applicant cannot supply the requisite number of referees (e.g. because they are recent graduates or have only held a small number of jobs), references may be sought from high quality alternatives (e.g. University tutor).

E.17 References, sent by Sophia High School, are requested by a member of the recruiting team to the named referees directly. These staff have successfully completed the Safer Recruitment in Education Training Course.

E.18 Prior to the interview, all permissible references must be requested for shortlisted applicants, taking into account whether the applicant has requested their current employer should not be contacted at this stage.

E.19 Prior to the interview, at least two written references must be requested for shortlisted applicants. Where possible, best endeavours must be made to ensure these are received and scrutinised before the interview. There must be at least one suitable reference received prior to an Interview being offered.

E.20 All offers of employment are conditional upon receipt of satisfactory references and any appointment must not be confirmed until all required references, which must include either the current or most recent employer, have been received.

Concerns from a Reference

E.24 All references should be scrutinised by the CEO and the SLT upon receipt and special attention paid to questions regarding disciplinary issues, suitability to work with children,

re-employment and whether the dates of employment, role and duties match the information supplied on the Application Form. Referees should be contacted for a follow-up conversation if any of these elements are unclear or give cause for concern. Notes of the conversation should be made and dated and retained on the applicant's personnel file. Any issues of significant concern should be escalated to the Head of HR.

E.25 Where an individual has not listed relevant or logical referees Sophia High School may ask the applicant to provide more suitable referees and/or should consider contacting those referees who have not been listed. Any such contact should be discussed with the applicant in advance, documented, dated and included in their personnel file if they are subsequently appointed. Reasons for leaving former employers should also be sought.

E.26 In the event that suitable references cannot be obtained, the matter should be escalated to the CEO for advice on how to proceed prior to any job offer being made.

Invitation to Interview / Teacher Induction

E.27 The *Invite to Interview / Induction Letter* should include; the date, time and place of the interview or link to virtual interview platform, directions to the venue, names of those people on the interview panel, details of the selection process, the full length Safeguarding Commitment statement and a statement that the interview will include questions relating to safeguarding.

E.28 Prior to the interview, applicants should be asked to bring / upload three original documents, a copy of which must be kept on the personnel file and the person verifying the documents must note the date received.

- Confirming their identity i.e. a current driving licence, passport and/or birth certificate (one of which must include their photograph) and confirmed in remote video interview.
- Confirming their current name and address such as a utility bill or financial statement (dated within the last three months) and confirmed in remote video interview.

Preparing for the Interview (Selection Process and Interview Panel)

Selection Process:

E.29 In order to help select the most appropriate applicants a number of different selection techniques may be deployed. In all cases, there should be an interview and this can be complemented by a carousel format such as; assessments, numeracy and/or literacy tests, a lesson observation and/or case study/presentation, etc. If appropriate, the final decision may be reached via a second interview.

E.30 It is important to prepare thoroughly prior to beginning the selection process, and the interview content is a key part of this. It is important to identify who should be involved in the

selection process, assigning responsibility and setting aside sufficient time for the work needed at each stage. This ensures all elements of recruitment safeguards are not rushed or overlooked.

Interview Panel:

E.31 It is recommended, but not mandatory to have a minimum of two interviewers, and in some cases, i.e. for senior or specialist roles, a larger panel might be appropriate. A recruitment panel allows for at least one member to observe and assess the applicant, and the other to make notes. It also allows for the corroboration of events within an interview should an applicant attempt to bring a claim for an alleged breach of process or legislation within the recruitment process. A manager who interviews alone does not have such a defence.

E.32 The members of the interview panel should meet before the interview to:

- agree and understand the required standard for the role to which they are appointing
- consider the issues to be explored with each applicant and who on the panel will ask about each of those
- agree the assessment criteria in accordance with the Role Profile and Person Specification
- review the *Interview Template* to select the relevant questions for the post, ensuring Safeguarding questions are a focus

E.33 The Recruiting Manager should also consult others involved in the selection process, and collate and assess any associated paperwork. These should be incorporated into the summary or interview record documentation as required.

Verify Identity

E.34 When verifying identity, those responsible are aiming to corroborate the person's full name, including forenames and last name, date of birth, and full permanent address. Where necessary applicants should also provide any official documentation regarding name changes. There must be three pieces of evidence to verify identity.

E.35 Where an applicant claims to have changed his or her name by deed poll or any other mechanism (e.g. marriage, adoption, statutory declaration) he or she is required to provide documentary evidence of the change.

E.36 A copy of the documents used to verify the successful applicant's identity and address must be kept on their electronic drive personnel file for record-keeping purposes and the person verifying the documents must record the date received on the SCR.

- Make sure that any details of current passport, driving licence and National Insurance Number are included on the electronic application form.
- Follow the two route ID checking guidance set out below.
- Seek photographic identity documents (passport, driving licence, e-Visa or PASS card) in the first instance. This can be used to compare the applicant's likeness.
- Check and validate the information provided on the electronic application form by the applicant.

- Check that the application form is completed in full and the information it contains is accurate. For example, that all addresses lived at in the last 5 years and all names known by have been declared accurately. Failure to do this can result in delays caused by conflicted applications that may be withdrawn.
- Make sure the applicant fills in the address part of the form correctly if they have an [unusual address](#), for example if they live abroad, in student accommodation or a hostel.
- Use a document type only once in the document count. For example, don't accept two bank statements as two of the required documents if they are from the same bank.
- Not alter or amend the application form without the knowledge or agreement of the applicant.
- Keep a record of the documents used to validate each identity for a minimum of 2 years. This is in line with compliance activity carried out by DBS. DBS will ask for records of documents checked as part of ID verification as part of this process. Documents can be recorded as copies of physical documents or PDF evidence of eVisa. If it is not possible to keep copies you should record:
 - document type
 - country of issue
 - any expiry date
 - any reference numbers, and
 - notes if there were any discrepancies discussed as part of the ID verification process.

Social Media Check

The SHS recruiting team will undertake a Social Media check of each candidate. Social media checks are conducted on job candidates to assess their online presence for potential red flags and to gain a more comprehensive understanding of their suitability for a role and company culture. These checks help employers identify potential risks, verify qualifications, and assess cultural fit beyond what is typically revealed in traditional hiring methods.

This screening typically includes an analysis of:

- Public posts and photos
- Comments and replies
- Shared content and likes
- Bio information or hashtags used

1. Identifying Red Flags:

Inappropriate Content:

Social media checks can reveal concerning content like hate speech, discriminatory remarks, or offensive language that might indicate a poor cultural fit or potential for future misconduct.

Illegal Activity:

Employers can identify potential red flags related to illegal activities, such as drug use or involvement in criminal activity, which could pose risks to the company.

Negative Impact on Reputation:

Social media checks can reveal posts or comments that could damage the company's reputation, especially in roles that are public-facing or involve sensitive information.

2. Verifying Qualifications and Skills:

Confirming Claims:

Social media can be used to verify information provided on a resume, such as skills, experience, and accomplishments.

Discovering Hidden Skills:

Employers may find evidence of skills or qualifications not explicitly mentioned on the resume, like coding experience or relevant industry knowledge.

3. Assessing Cultural Fit:**Personality and Values:**

Social media posts can reveal a candidate's personality, values, and how they interact with others online, which can help assess their potential fit within the company culture.

Professionalism:

Employers can assess a candidate's communication style and overall professionalism through their online interactions.

4. Protecting the Company Brand:**Preventing Damage:**

By identifying potential risks before hiring, social media checks help prevent employees from engaging in behaviors that could negatively impact the company's reputation.

Maintaining Brand Reputation:

Social media checks can help ensure that new hires align with the company's values and will represent the brand positively.

5. Legal and Ethical Considerations:**Bias and Discrimination:**

Employers must be mindful of potential bias and discrimination in their social media screening and ensure they are not violating privacy laws like [GDPR](#), [FCRA](#), [EEOC](#), and [CCPA](#).

Transparency and Fairness:

It's crucial to conduct social media checks fairly and transparently, ensuring all candidates are assessed equally.

Focus on Public Information:

Employers should focus on publicly available information and avoid accessing private or sensitive information.

Verify Professional Qualifications

E.37 Prior to interview, applicants must also be asked for evidence of their educational or professional qualifications that are necessary or relevant for the role (i.e. the original or certified copy of a certificate, or diploma, or a letter of confirmation from the awarding body). If the applicant cannot produce original documents or certified copies, written confirmation of his or her relevant qualifications must be obtained from the awarding body (for teaching positions) prior to the appointment / verification being confirmed.

E.38 A copy of the qualifications must be kept on the personnel file and the person verifying the documents must sign and date the copies.

Interview (Scope of Interview, Outcome and Regrets)

E.39 The interview should assess the merits of each applicant against the role requirements. It is important to ensure that the interview process adopted for internal applicants is exactly the same as that for external applicants for the same role. It is also very important to explore each applicant's suitability to work with children.

E.40 Each applicant must be given a fair and equal opportunity to demonstrate that they have the skills, experience and personal attributes that are being sought. The selection process should reflect the requirements of the role, the necessary competencies to be successful in the role and the personal qualities appropriate to the environment.

E.41 All applicants should be tested in the same areas and should convincingly reach the level that was expected at the outset. An applicant should not be recruited based on being the 'best of the group', they should be the best person for the role. This may require commencing the search again if a suitable applicant is not sourced from the original search.

E.42 Having agreed the interview questions the panel will explore any issues with each applicant, based on the information provided in the Application Form and references received. An applicant's response to a question will determine whether and how that is followed up.

E.43 It is better to ask behavioural based questions which ask an applicant to relate how s/he has responded to or dealt with an actual situation in the past, or questions that test an applicant's attributes and understanding of key issues.

E.44 Interview notes should be taken by all panel members and collated at the end of the interview by the Recruiting Panel. Interview notes should be legible and cover all key topics discussed during the interview. At the very least the Recruiting Panel should prepare a legible or typed summary of the interview covering the points listed in section, space for which is provided on the SHS Interview Form 6.43. Furthermore, the Interview Team should make summary comments as the responsible persons. Collaborative Interview Forms are prepared, completed and stored in a secure Drive.

E.45 The Admissions Manager (in the role of Office Manager) should ensure the interview notes are securely retained for a maximum of six months and then if the applicant is not successful, they may be shredded/archived. It is important that interview notes are retained for this period of time as they will provide justification in the event of a potential complaint about the selection process.

E.46 Interview notes for the successful applicant should be retained securely on their personnel file for record-keeping purposes for the duration of their employment and any required statutory period of time thereafter.

Scope of the Interview:

E.47 In addition to assessing and evaluating the applicant's suitability for a particular role, it is imperative that safeguarding questions are asked at interview to ensure the filtering process of unsuitable applicants, but also to gain an insight in to the knowledge, experience and attitude of the

applicant towards safeguarding, as this information can facilitate early training requirements upon commencement of role.

E.48 The interview panel should also therefore explore:

- the applicant's attitude towards children and young people
- his or her ability to support Sophia's policy for safeguarding and promoting the welfare of children
- gaps in the applicants' employment history
- periods of time spent overseas
- concerns or discrepancies arising from the information provided by the applicant and/or a referee

E.49 All applicants invited to interview are entitled to a meaningful interview irrespective of any change in circumstances (e.g. change of budget; identification of a preferred applicant; answers to early questions are poor) which might tempt the Recruiting Panel to abbreviate the process. This maintains a professional image of the company and will to some extent protect from potential claims of an unfair process.

The Outcome:

E.50 The recruitment decision should be based purely on the criteria required, so any outcome can be explained constructively to the unsuccessful applicants. Any feedback that can help them should be given honestly and, for internal applicants, learning and development areas may be identified. The HR Department can assist with ensuring this feedback is constructive.

Regrets:

E.51 Unsuccessful applicants should never hear the result from a third party, so it is essential that the successful applicant is either told after the regrets or in confidence until all the outcomes are known. It is the Admissions Manager's (in the role of Office Manager) responsibility to ensure that this process is controlled effectively.

Terms and Conditions of Employment / Consultancy Agreements

E.52 The *Template Offer Letter and Contract of Employment* must be used in order to satisfy the conditions of employment relating to safeguarding.

E.53 Consultant LTO based teachers are not considered employees of Sophia High School, thus a Contract of Engagement & Terms and Conditions are in place in order for Sophia to continue to fulfil all Safer Recruitment in Education obligations with regards to verification checks on consultant staff.

Probation

E.54 The initial period of employment enables an observed judgement of an applicant's suitability to work with children.

Rehabilitation of Offenders

All applicants are required to give full details of convictions and cautions, including those which would otherwise be considered "spent" by virtue of the said Act.

Standards and Policies

E.55 All Sophia High Employees are expected to conduct themselves in line with our Code of Conduct and Acceptable Use policy.

Safeguarding Declaration

E56 All applicants will be required to sign a Safeguarding Declaration within the Contract of Employment / Terms and Conditions to evidence their commitment.

(Step 5) Background Checks

E.57 An offer of employment must be conditional upon:

- The receipt of at least two satisfactory written references
- Verification of the applicant's identity
- Right to work
- An Enhanced Disclosure and Barring Service (DBS) check, (paper copy) must be shown to the ID checker by the applicant before starting work. An Enhanced DBS with Barred List check is required for people working in Regulated Activity and this is the default set up for Sophia's online application service with Security Watchdog Capita.
- The receipt of overseas criminal records checks for all other countries in which the applicant has lived or worked for three months or more in the past ten years (if applicable)
- Country of Origin check (if applicable)
- verification of appropriate qualifications/professional status (where required)
- Satisfactory completion of the probationary period

E.59 All checks should be recorded in writing, verified (date and signature) documented and retained on the employee's personnel file. A summary of the checks must be recorded on the *Single Central Record (SCR)*.

E.60 The above checks must be completed before an applicant is verified; this may result in delaying the commencement of Verified status.

E.61 Any exceptions to this must have been discussed within a conference call involving the Chair of the Board who confirms their agreement that it is necessary for the individual to start work before

all the vetting checks are complete and that the proposed measures that will be taken are appropriate to safeguard students' welfare.

E.62 Any exceptional permission to appoint without all recruitment vetting checks completed will be subject to the following conditions:

- All vetting checks **must** have been applied for
- A Barred List check **must** have been completed and confirmation obtained that the individual is not on the Barred List
- A Prohibition from Teaching Check (including EEA Sanctions) **must** have been completed (if applicable)
- A Prohibition from Management Check **must** have been completed (if applicable)
- At least one written reference **must** have been received, and the Recruiting Manager must have spoken personally over the telephone (or face to face) with the remaining referee(s), asked and obtained answers to all of the questions on the reference request form, and a full written note must have been taken of these discussions and placed on the personnel file
- Verification of the individual's identity, right to work in the UK, qualifications **must** have been completed
- A written Risk Assessment must be carried out using the appropriate *Risk Assessment Form* and this **must** be suitably approved then placed on the personnel file
- If the missing check is the DBS and there is no portable DBS available from working in an educational establishment immediately prior to their appointment, then a note that there is a risk assessment in place should be recorded on the *Single Central Record (SCR)*

E.63 If any of the information contained in the pre-employment checks is unsatisfactory or has discrepancies, this should be followed up by the Recruiting Manager supported by a member of the HR Department. Any disclosure information relating to a conviction should be notified to the CEO for careful consideration of suitability to the post. Serious, deliberate fraud or deception in connection with an application for employment may amount to a criminal offence. In such cases the employer should, in addition to any planned disciplinary action, consider reporting the matter to the relevant authorities and/or regulators. The CEO will be notified of any reporting to relevant authorities and/or regulators.

E.64 To assist you in keeping track of this process, please use the *New Starter Probation Checklist*.

References

E.65 Previously detailed in Sections 6.16 – 6.28 inclusive.

Verifying Identity

E.66 Previously detailed in Sections 6.36 to 6.39 inclusive.

Right to Work

E.67 When appointing new staff the person's right to work in the UK must be verified, advice can be sought on <https://www.gov.uk/check-job-applicant-right-to-work>
Copies of documents should be verified (date and signature) and retained on the personnel file.

Enhanced Disclosure and Barring (DBS) check including the Barred List

E.68 UK DfE regulations for educational establishments set out a statutory duty to obtain an Enhanced DBS, which must include Barred List information for newly appointed staff in regulated activity i.e. all permanent, fixed-term contracts and temporary staff employed by the Sophia before they commence employment. Where the post holder will not undertake regulated activity, an Enhanced DBS must be carried out (again, before they commence employment), but Sophia is not permitted to carry out a Barred List Check on those not undertaking regulated activity.

E.69 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:

E.70 Regulated Activity includes:

- a) Teaching, training, instructing, caring for or supervising children if the person is unsupervised or providing advice or guidance on wellbeing, or driving a vehicle only for children, or engaged in overnight activity, even if this happens only once.
- b) Work for a limited range of establishments (known as "specified places" which includes 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. Some activities are always regulated activities, regardless of their 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, for reasons of age, illness or disability, with eating or drinking or in connection with toileting, washing, bathing or dressing.

E.71 Regularly is once a week, on four or more days in a 30-day period or overnight. As a general rule, it is likely that all company personnel will be carrying out regulated activity, and so will require a Barred List check with their enhanced DBS check. However, in order to assess whether a particular role involves regulated activity, please consult the Keeping Children Safe in Education (September 2023) guidance or refer to the HR Department.

E.72 The relevant DBS check must be carried out as a matter of priority for all new employees at the job offer stage via the online system. If the offer is made more than three months before the employment will commence, it is best practice to wait until three months before the commencement date before applying for the DBS check.

E.73 In addition, where an applicant is found to be on the Barred List, or the DBS Disclosure shows s/he has been disqualified from working with children by a court; or an applicant has provided false information in, or in support of, his or her application; or there are serious concerns about an applicant's suitability to work with children, the facts must be reported to the Police, the DBS and:

- If the individual is a teacher in England, the DfE Children's Safeguarding Operations Unit (formerly the Teachers Misconduct Team) must be informed
- If they are a teacher in Wales, the General Teaching Council of Wales must be informed.

E.74 All steps taken in following up such issues must be clearly documented and retained on the recruitment file.

E.75 Sophia is able to undertake a free, online status check as an alternative to making a full new DBS check if the applicant has subscribed to the "Update Service" and gives written permission to the company to do so. By using this service, Sophia is able to check if any new information has come to light since the DBS certificate was originally issued. However, if the check does declare that something has changed the company will need to seek a new disclosure in order to use that information as evidence for a discussion with the applicant.

E.76 To carry out a status check of a DBS certificate, Sophia must:

- Have the applicant's consent
- Confirm that they are legally entitled to carry out the status check
- See the original certificate to check it is the same type and level as they are legally entitled to apply for
- Make sure that the right checks have been carried out and see what, if any, information was disclosed about the applicant
- Check the person's identity
- Check the name on the DBS certificate matches this identity
- Note the DBS certificate reference number, the person's name and date of birth

E.77 If the successful applicant has not subscribed to the "Update Service" they should be instructed to log into the Capita online portal to commence their DBS check via; <https://disclosure.capitarvs.co.uk/cheqs/rbLogin.do>

If the applicant did not provide appropriate identity documents prior to/on the interview day to meet the identity checking requirements for the DBS, then they will be required to bring their original (not copy) ID for checking to a Sophia verifier as part of the recruitment process. As an alternative, applicants may submit Post Office Certified copies of ID and Proof of Address Documents via the Sophia Online portal. Copies of documents should be verified (date and signature), retained on the personnel file and recorded on the SCR.

E.78 An Applicants' Guide can also be downloaded for further information via; <http://www.capitarvsclientzone.co.uk/e-bulk-guidance.aspx>

E.79 It is best practice to update DBS checks (including Barred List checks if applicable to the role) for all staff, as from time to time determined by the CEO, or as soon as possible if concerns arise about an existing staff member's suitability to work with children. Additionally, staff are required to sign an annual self-declaration regarding their suitability to work with children.

E.80 Please note that it is only permissible to keep a photocopy of a DBS and/or criminal/Police records for up to six months and for reasons of a formal recruitment query. A record of the check and confirmation that it was satisfactory will be recorded on the *SCR*, together with details of the certificate number.

Overseas Checks

E.81 Staff that have lived and/or worked outside of the UK must undergo the same background checks as all other applicants, plus additional criminal/Police record checks (overseas checks) to account for their time spent overseas. Copies of documents should be verified (date and signature), retained on the personnel file and recorded on the *SCR*.

E.82 Criminal/Police record checks must be sought for:

- All other countries in which the applicant has lived and/or worked for a period of three months or more in the past ten years. Please note that checks are not required prior to the age of 16.
- Country where applicant completed teacher training or post-secondary education (or relevant teaching qualifications) (if not within the UK).

E.83 If an overseas check is not in English, a reputable translation company should be used to translate the document. To ensure data protection, no member of the staff or department must be asked to assist with translation, unless they are a member of the Interview Panel. Please contact a member of the HR Department for further support.

E.84 In the event that criminal/Police record checks are not available or forthcoming from a country, alternative documents to evidence their time spent in the country must be sought, such as certificates of good conduct (where available) or, if they worked in the country, full employment references. If no employment references are available, character references from professionals that knew the individual in the country can be sought. This should be recorded on an *Overseas Criminal Checks Risk Assessment Form* and filed on the applicant's personnel file.

E.85 Any disclosures on overseas checks will need to be discussed with the Head of HR / CEO / Chairman to allow an informed recruitment decision to be made.

E.86 UK Military Personnel:

- If an applicant has spent time overseas serving in the British Forces, criminal/Police record checks should still be requested for all countries where the individual has spent three months or

more in the past ten years, as offences committed away from the base are not always recorded by the forces and documented in a DBS check.

Location Change

SHS teachers who work online may change location within reasonable time zones to meet personal needs. If a teacher changes country, they must provide a Police Clearance Certificate for the country they are leaving to be retained on file, and if possible, update their UK DBS certificate.

Country of Origin Check

E.87 Anyone born outside the UK (and who does not hold a British Passport) must provide either a copy of their birth certificate or a passport which shows their place of birth.

E.88 Copies of documents should be verified (date and signature), retained on the employee's personnel file and recorded on the SCR.

(Step 6) Recording and Monitoring New Starters

The Single Central Record (SCR)

E.89 Sophia keeps a *SCR* to evidence they have carried out the range of checks required by law on their staff. All individuals who work in regular contact with children, including volunteers and those employed by third parties (including Teacher Trainees) must be included on the SCR, along with details of all members of the Proprietor Body.

E.90 The *SCR* must contain the following fields:

- Full name of staff member
- Position and Start date
- Identity check
- Qualifications
- Enhanced DBS
- Right to Work in the UK
- Overseas checks
- References
- Application Form

E.91 Best practice for all documents copied, dated and signed is to state they are "copy of original" so that there is no doubt on record. It also helps if the signature has the name printed underneath for future reference.

E.92 The checker must input the following on to the *SCR*:

- The date the original documentation was seen
- Name of person checking the documentation
- The clearance level for Right to Work is “Yes”
- For most DBS entries the clearance level is “Enhanced with Barred List”
- if there is no requirement to see documentation “N/A” must be entered as no field should be left blank.

E.93 Only one location should be responsible for; holding the full personnel file of a staff member, obtaining the necessary documents and for undertaking any appropriate checks. They are then responsible for providing written confirmation of the checks to the other sites, together with any applicable risk assessments.

New Starter Checklist and Risk Assessment Form

E.94 The *New Starter Probation Checklist* must be completed as an evidence tool that all necessary checks and returns have been received. This document is signed off by the CEO and filed in the personnel file.

E.95 If any of the checks required are not fully compliant with the standard process this must be documented on a *Risk Assessment Form* whereby a discussion with the employee is recorded, the considerations noted, details of any mitigating actions are clearly defined and the outcome determined by the CEO to enable a full audit trail.

Staff Annual Declaration

E.96 On an annual basis all staff will be required to complete the *Staff Annual Declaration* which ensures their knowledge and understanding of safeguarding related policy, procedure, key contacts and (for all relevant staff) provides for a personal safeguarding declaration with regard to DBS and Childcare Disqualification. The completed Declaration must be filed in the personnel file. Where an aspect of the annual declaration is not applicable to the role undertaken by the individual, then they should enter “N/A” against the relevant entry on the Declaration before signing and returning it.

(Step 7) Probationary Period including Induction

Induction

E.97 An induction programme should be made available to all new staff, regardless of role or previous experience. The purpose of the induction is to:

- Provide training and information about the platform and Sophia’s policies and procedures including the vision and values, objectives and ethos, with specific reference to safeguarding and promoting children’s welfare, including child protection.

- Support individuals in a way that is appropriate for the role to which they have been appointed;
- Confirm the conduct that is expected of staff (Sophia's Code of Conduct including neutral notification)
- Provide opportunities for new members of staff to discuss any issues/concerns about their role or responsibilities
- Enable the new member of staff's Line Manager to recognise any issues/concerns about the person's ability or suitability at the outset and address them immediately.
- (See SHS New Teacher Induction checklist with allocated roles).

E.98 The content and nature of the induction process will depend upon the role and previous experience of the new member of staff, but must include the information on the policies and procedures in relation to safeguarding and promoting the welfare of children e.g.:

- (Education) Safeguarding and Child Protection Policy and Procedure; which should also cover;
- Safe practice and the standards of conduct and behaviour expected of staff and students
- How and with whom any concerns about those issues should be raised
- (HR) Other relevant employment procedures which should include;
- Disciplinary, performance improvement and whistleblowing procedures
- Sophia Acceptable Use and Code of Conduct
- Equal Opportunities Policy and the wider Employment Handbook available on the School Staff Drive Folder

E.99 An *Induction Checklist* provides the means to document that safeguarding was covered in the first week of employment as a further demonstration of Sophia's commitment to safeguarding our students. This *Induction Checklist* should be completed for each member of staff and filed in the personnel file.

E.100 The induction programme should also include Child Protection Training appropriate to the new member of staff's role to ensure their full understanding of their safeguarding responsibilities. In addition, this will help ensure they best understand Sophia's commitment to safeguarding and promoting the welfare of children.

E.101 The new member of staff will be required to sign the *Staff Annual Declaration* upon joining the company and on an annual basis. A copy of the signed *Declaration* must be placed in the personnel file.

Probation

E.102 The initial period of any new role is inevitably a time of adjustment during which the new starter becomes acquainted with a new environment, different working practices, routines and standards of performance. This will take time and to enable both parties to realistically assess

suitability for the role, as such all new starters employment is subject to a probationary period (the length is role dependent).

E.103 Performance will be monitored and discussed throughout this period including a formal review meeting to discuss how both parties feel about the role, department/Company and progress made in position and to ensure positive relationships with colleagues, students and parents have been made.

E.104 If the Company is not satisfied that the necessary level of performance has been reached during the probationary period and/or there are some other concerns, the probation may be extended. In some instances, either party may decide to give notice to terminate employment (which is usually a shorter period during this time).

E.105 A new member of staff whose role places them in the Recruitment Community must undertake *Safer Recruitment Training* during their Probation Period.

E.106 The probation period is also a significant period during which the new starter's attitude to safeguarding should be assessed. No appointment should be confirmed until the Line Manager is satisfied that the new starter fully understands and embraces the company's safeguarding philosophy and understands their own personal accountability.

E.107 The Probation Review Form should be used to document the discussion and conclude the probationary period. No confirmation of successful completion of the probationary period should be issued if there is still an outstanding check required.

Suitability

E.108 The initial period of engagement as Sophia Employee is inevitably a time of adjustment during which the new teacher becomes acquainted with the use of the platform, timetable, standards and working practices, reporting and feedback from wider staff, parents and students This will take time and to enable both parties to realistically assess suitability for the role, as such all new teachers are subject to a probationary period.

E.109 Performance and ongoing feedback from clients will be monitored and discussed throughout this period in order to ensure positive relationships with students and parents have been made. Negative reports and feedback will be followed up with both parents and clients via the School Leadership Team.

E.110 If Sophia is not satisfied that the necessary level of performance has been reached during the probationary period and/or there are some other concerns, the probation may be extended or ability to continue in employment with Sophia High School brought to an end.

Notification Responsibilities

E.111 If any information regarding an applicant comes to light through the recruitment and selection process, to suggest that they may have harmed or pose a risk of harm to a child or vulnerable adult the matter should be discussed with the Director of Education immediately to ensure we meet our legal duty to refer a 'cause for concern' of this nature to the relevant third parties.

E.112 This obligation regarding the legal duty to refer to a "cause for concern" extends beyond the recruitment and selection process and applies to any HQ staff, volunteers, trainee teachers, supply staff, those on fixed term contracts, resignations, voluntary withdrawal and all contract workers. All such instances will be disclosed to the Chair, so that the Proprietor exercises their duty appropriately. In addition, all such instances will be disclosed to any external inspector as required.

7. Compliance

7.1 I have read and fully understand the above Policy and Procedure and accept and agree to all the terms and conditions outlined in this and the incorporated documents, or part documents, as specified.

7.2 If any provision of this Policy is or becomes illegal, void or invalid, that shall not affect the legality and validity of other provisions.

JOB TITLE/ROLE:	_____
PRINT NAME:	_____
DATE:	_____
EMPLOYEE SIGNATURE:	_____