

Safer Recruitment Policy and Procedure

This Policy Relates to the following Legislation

- The Children Act 1989
- The Protection of Children Act 1999
- The Care Standards Act 2000
- Education Act (Section 157) 2002
- The Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- The Protection of Freedoms Act 2012

This Policy Relates to the following Regulations

- The Education (Independent School Standards) Regulations 2014
- Children’s Homes (England) Regulations 2015

This Policy Relates to the following Guidance

- Every Child Matters (2004)
- Statutory Guidance on making arrangements to safeguard and promote the welfare of children under section 11 of The Children Act (2004)
- The Bichard Inquiry: final report (2005)
- Regulated activity (children): supervision of activity with children which is regulated activity when unsupervised (DfE 2012)
- Helping employers make safer recruiting decisions (H.O. 2015)
- The PREVENT duty: for schools and childcare providers (2015)
- Safeguarding children and young people and young vulnerable adults policy (2015)
- Guide to Children’s Home Standards Including Quality Standards (April 2015)
- Keeping Children Safe in Education (DfE 2016)
- Working Together to Safeguard Children (updated February 2017)
- The Pan-Sussex Child Protection and Safeguarding Procedures Manual:
 - <https://sussexchildprotection.procedures.org.uk/#>
- Reference to the Brighton and Hove statutory Local Safeguarding Children Boards (L.S.C.B. also known as F.D.F.F. – Front Door For Families).

This Policy Applies To:

- a) All those directly employed by The Lioncare Group and who are in positions and roles that require them to interact with or work alongside or around or in proximity to the children in our care and includes those who will have contact with children within the organisation and will be seen as safe and trustworthy and/or have access to confidential and sensitive information e.g. Administrators, House Keepers, Cleaners, Maintenance Workers.
- b) All those indirectly employed by The Lioncare Group by virtue of being sub-contracted or commissioned and paid by The Lioncare Group to carry out work on behalf of The Lioncare Group and where such work causes them to interact with or work alongside or around or in proximity to the children in our care.

- c) All those working in partnership with The Lioncare Group in the form of voluntary work or student placements and where such work or activity involves interacting with or work alongside or around or in proximity to the children in our care.
- d) The principles of safe recruitment should also be included in the terms of any contract or service level agreements drawn up between the organisation and contractors or agencies that provide services for, or staff to work with, children and young people. Any service level agreement or contract should contain a safeguarding statement, which makes explicit the standards expected. The agreement should be regularly reviewed.

Responsibilities Associated with this Policy:

All employees, whether they are 'front-line' engaged directly in the task of caring for, educating, and supporting the children in our care, or 'ancillary' (e.g. House Keeper, Maintenance Worker, Administrator etc.), are personally responsible for managing their own conduct in relation to following this policy.

All employees whether they are 'front-line' or 'ancillary' are also responsible for supporting their colleagues and co-workers to follow this policy.

Members of the Management Team (Senior Therapeutic Carers, Deputy Managers, and Registered Managers) are responsible for ensuring all those employed directly or indirectly or on a voluntary basis or as a student placement are made aware of this policy and guidance, and for monitoring their safe and proper conduct whilst interacting with or work alongside or around or in proximity to the children in our care and for taking such action as necessary to prevent children being at risk of harm because of an adult's failure to follow this policy and guidance.

The Executive Team (Service Managers and Executive Director) are responsible for reviewing this policy and at least annually and more frequently if and when it is considered necessary to do so, and for ensuring this policy remains fit-for-purpose.

Monitoring and Review of this Policy:

The implementation of this policy and its corresponding guidance will be monitored continuously, and the policy itself will be reviewed at least annually in August of each year by the Executive Team and in consultation with relevant others including where possible and feasible those involved in caring for, educating, and supporting the children in our care, and consultation with the children themselves.

Policy Statement

The Lioncare Group is a specialist environment providing therapeutic care and education for children and young people who have been profoundly damaged by their early life experiences, and who display behaviour that can challenge those who work with them. The task of caring for and teaching our children and young people needs very special adults who have the capacity to be kind, reflective, resilient, boundaried, imaginative, conscientious, robust, professional, and knowledgeable in their approach to daily work under great pressure. While equality and safety are at the heart of this policy, we also seek to offer a description of how we choose and develop those adults who will offer the best opportunities for our children and young people to thrive.

Safer Recruitment

The Lioncare Group puts the welfare of children and adults at the center of all of its work. This policy and the procedures within are written with reference to Keeping Children Safe in Education, part 3 (2016) and outlines in full the measure taken to **deter, reject, prevent** and **detect** those who might abuse children or who are unsuited to work with them.

Equal Employment Opportunity

We believe in equal employment opportunity for all regardless of race, national origin, religion, gender, age, disability, or sexual orientation. We aim to ensure non-discrimination is maintained towards all clients,

suppliers and sub-contractors. We provide multiple opportunities for applicants to talk to us about any aspect of the process that may be a barrier to equality of opportunity.

Internal Staff Promotion

We enable and actively encourage employees and colleagues to progress within their workplace, where availability of position and employee's abilities and qualifications permits. We seek to fill vacancies through internal promotions where possible and appropriate. We also insist that current employees must submit written applications, attend interview, and follow selection processes as expected of external applicants.

Appointments are based on personal merit and ability to perform the required task. If the position cannot be filled internally, it may be advertised externally. Promotions are not based on length of service, and never considered as 'a given', and equal opportunity principles are always applied.

Ongoing Culture of Vigilance

All prospective candidates seeking employment with The Lioncare Group should take note that everyone involved in the organisation, along with the children themselves, promote ongoing awareness and vigilance about welfare and safety. There is awareness by all that adults who may want to harm children could seek to work in or gain access to our Homes and School, or that those who currently work in our Homes and School could create circumstances where children come to harm.

There are clear and well promoted procedures for raising concerns, including Whistle Blowing, and the culture of the organisation is open and reflective. There are regular mechanisms such as training, coaching, surveys and practice based discussions to explore and develop practice, knowledge, skills and attitudes. Robust liaison with external colleagues including regulators, local authorities, the police and other safeguarding agencies means that challenge and support is inherent in daily life.

The Recruitment and Selection Process

Planning

The Executive Director, in consultation with Senior Managers across the organisation and at the regular Senior Team Meetings, decides that there is a vacancy.

The process in the Homes is co-ordinated by the Service Manager and supported by the Administrators, and in the School by the Head Teacher supported by the Senior and Junior School Administrators, including dates for interviews, screening and short listing, interview questions, and pre-interview planning.

The Job Description and Person Specification are written and/ or reviewed, including a description of safeguarding responsibilities and the requirement to pass pre-employment checks.

Advertisement

All vacant positions are advertised initially using internal notifications posted to The Lioncare Group's internal information system known as the GDrive and posted on notice boards in each setting. Interested parties request and receive an Application Pack from the Administrator at Lioncare House. Requests for application packs can be made via e-mail, telephone, in writing, or in person.

If no suitable internal candidate is identified, or if the position has been deemed to require skills and/or expertise known to be not held by current employees, the role is advertised externally and also to The Lioncare Group's website (www.lioncare.co.uk).

An advertisement is created that accurately lists the details of the position to be filled. The advertisement will include a safeguarding statement and include the need to pass pre-employment checks. The advertisement will include details of who to contact if the applicant wishes to discuss any concerns as to the accessibility of the process.

External advertisements will be placed in appropriate and 'safe' publications and/or online recruitment websites that offer scope of attracting the most suitable candidates for the position whilst deterring those that may be seeking to gain access to vulnerable children in order to do them harm.

Employee Referral Scheme

We also operate an Employee Referral Scheme Policy whereby if certain conditions are met an existing employee can be awarded a bonus payment if someone they refer for consideration of employment with the organisation is successful in their application and remain employed for a set period of time.

Application Packs

Application Packs are downloaded from The Lioncare Group's website or sent on request; requests for application packs are responded to by email or post and usually within 3 working days of the request being received by The Lioncare Group. A copy of this Safer Recruitment Policy is also available on our website and applicants are strongly advised to read the policy, including the statements on and commitment to Safeguarding before completing the application form.

Application Forms include opportunity for self-disclosure of details of cautions or convictions not protected by the rehabilitation of offenders act 1974 which are returned in separate sealed envelope Applicants are made aware that there are no circumstances where a CV is an appropriate method of application for the post and only fully completed forms will be accepted.

Applications

On receiving back a completed application form, the Administrator carries out an initial check to confirm the form is completed correctly and that any additional information candidates have been asked to provide has been enclosed.

Where incomplete applications are received, or information is missing, the Administrator contacts the candidate, informs them of the situation, and advises their application cannot be considered in its current state. The applicant then has 24 hours to provide the necessary information, or withdraw their application.

The following must happen prior to any short-listing:

- Self Disclosure Forms and Equality Monitoring Forms are separated from the application form.
- Application forms are scrutinised for inconsistencies or gaps in employment history since leaving full time education.
- Any such gaps or inconsistencies are noted for follow up at interview should the candidate be interviewed.
- Applications must be signed or sent from an email account named for an individual, not using a pseudonym or generic account.

Short-list

At least two people will meet to short list. Applications will be scrutinised against the job description and person specification and further checks for inconsistencies or gaps will be undertaken. All decisions of the short listing panel will be recorded.

As well as looking for candidates who meet the Person Specification the panel will be looking for evidence of safe, reflective and well-balanced approaches to working with children. Candidates who demonstrate open self-awareness, a commitment to personal development and a sense of themselves as experiential learners are likely to do well in our selection process, if all other criteria are met.

A Schedule for Interview is produced and the Administrator sends a standard Letter of Invite to Interview to each short-listed candidate, detailing the position they have applied for, the time, date, and location of the formal interview, an outline of the interview processes and a request to confirm their attendance for interview. It also reminds candidates to bring to interview original copies of identification. Candidates without these must account for this and agree to provide them within reasonable time scales. Failure to do so may influence the panel's decisions.

Reference seeking

References must be requested prior to interview. The Administrator sends out standardised letters and reference forms to the referees specified on the application form. Two employment references are sought for prospective new employees prior to them starting employment. If an applicant does not give permission for a current employer to be approached then the most recent employer in a setting where the applicant has worked

with children must be approached. If permission is given for the current employer but that is not a setting where the applicant works with children, then the most recent employer in a setting where the applicant has worked with children must also be approached.

A consistent pro-forma must be used to seek references and there is a separate pro-forma for candidates who have never worked with children. Referees should be sent the Job Description and Person Specification. Referees must be asked about the candidate's suitability to work with children and specifically about any allegations that have been made against the candidate and details of any disciplinary process.

An additional verbal reference or telephone enquiry to the referee is also sought, with the aim of verifying the authenticity of the referee, and in line with safeguarding procedures and good practice. Where a prospective new employee has previously worked in a position involving work with children, children, or vulnerable adults, the opportunity is taken during the verbal reference or telephone enquiry to verify the reason why the employment or position ended.

Any barriers to the gathering of all information should be highlighted immediately to the Service Manager (for the Homes) or Head Teacher (for the School) who may in consultation with the Executive Director decide that a telephone conversation with the referee is necessary.

Open references or testimonials are never accepted.

Invitation to Interview

It will be usual to give candidates at least one week's notice of interview. All information is sent at this time including that concerning any task the interviewee may be requested to undertake. The invitation will also include an opportunity for the candidate to inform the interview panel of any access requirements.

Prior to interview

The interview panel will meet prior to interview to ensure they have a consistent set of questions for each candidate. In addition they will have a further discussion of each candidate based on the references and on any self disclosure forms that have been received and prepare questions in response to these.

The Formal Interview Process

Identity and qualifications of candidates are verified by the administration team before the interview starts by scrutiny and copying of original documents. The Job Descriptions for all positions that relate to carrying out the therapeutic care task have a section titled "Core Competencies for Therapeutic Practitioners" that has been designed and researched and promoted by The Consortium of Therapeutic Communities (TCTC) and the Royal College of Psychiatrists Community of Communities Quality Improvement Network. Questions based on the Teachers Standards (DfE) are used for teaching positions.

Each candidate is assessed against these core competencies as part of the selection process, to ensure The Lioncare Group has the most suitable and competent adults caring for and teaching the children and young people it has been tasked to look after.

During the interview, the panel will be taking care to find out who people "are" as well as what they know and can do. We promote an interactive and participative atmosphere and encourage candidates to openly explore with us whether The Lioncare Group is the right environment for them.

The interview panel consists of no less than two and no more than four people to minimise risk of biased decisions. Wherever possible, all panel members will have received Safer Recruitment training prior to conducting interviews. Panel members hold seniority status at Deputy Manager level and above.

The initial interview is standardised and includes the following:

- candidates are greeted by the Administrator, informed of facilities in the building, and offered refreshments. They are asked to wait in an area away from the interview room.
- a panel member introduces themselves to the candidate and invites them to join the panel in the interview room.
- the lead panel member introduces the candidate to each member of the panel, checks that the candidate is comfortable and ready to begin the interview.
- the lead panel member welcomes the candidate and introduces themselves and the other panel members.

- they explain the standard format to be used, involving a set of standard questions for each candidate delivered by each member of the panel, the opportunity to ask additional questions where appropriate, and for the candidate to ask questions of the panel.

For certain positions, candidates may be asked to carry out additional selection tests including producing a piece of writing within specified time scales in support of their application.

Candidates are informed they will be notified of the outcome of their interview within a set timeframe, and of the next stages should they be successful at this initial interview.

The 2nd Informal Stage of Interview Process

The panel compiles a final short-list of candidates invited to attend a second informal group interview (where more than one candidate has been short-listed) or a second informal individual interview (where only one candidate has been short-listed as successful at first interview).

The second informal stage of the interview takes place (and depending on the nature of the position for which the candidates has applied) in the Homes and is facilitated by the respective Registered Manager or in the School and is facilitated by the Head Teacher.

Candidates meet with current employees, view the work settings, observe day-to-day life in the setting and, where appropriate, meet some or all of the children (but only those that have previously expressed a wish to be involved in the process). The children will have been offered the choice to either prepare questions to ask the candidates, or which can be put to the candidates by the Registered Manager or Head Teacher on their behalf, or to undertake less formal conversations.

For teaching posts a specific piece of work is done with candidates on second interviews to help them understand the task of providing therapeutic education and convergences and divergences between this work and other teaching and learning settings that they have experienced

All candidates attending second interviews are closely supervised, and allocated a current employee responsible for maintaining direct supervision of the candidates throughout. No candidate is left unsupervised for any reason whilst on the premises. There will be a debrief session provided either straight after or by telephone to help them make meaning from their experience.

Selection

Following the second informal interview the panel meets and endeavours to reach a unanimous decision to recruit. Where a unanimous decision cannot be reached, the Executive Director's decision is final. Where there are minor concerns around suitability of a candidate, the panel may invite them to an informal meeting to discuss these further before making a final decision.

Once a decision has been reached, the Administrators contact each candidate by telephone and inform them of the outcome of their interview. This will normally take place within two days of the panel's agreement on decision to recruit.

Candidates who are realistic about the work, aspirational about the impact good practice can have on outcomes for children and young people and who make efforts to show their own individuality and to get to know our way of working are likely to do well, given all other criteria are met.

Conditional offer of appointment

Successful candidates are contacted first, and verbally informed of the conditional offer of employment. The offer is conditional on the pre-employment checks (listed below) being satisfactory and there being no concerns raised from on any further references from any further references being sought and obtained.

Unsuccessful candidates are contacted last. The Administrator sends a formal letter (or email) thanking them for their time and interest in our organization, and wishing them success in their search for employment.

Pre-Employment Checks¹

- a. Identity (if not confirmed at interview)
- b. Proof of address

¹ If there is any uncertainty at all about the type of check that should be undertaken in any circumstance then Keeping Children Safe. Part 3 (2016) should be referred to.

- c. Qualifications (if not confirmed at interview)
- d. Further references if required
- e. Health checks
- f. Permission to work in the UK
- g. Enhanced DBS certificate
- h. DBS barred list
- i. Overseas checks including EEA restrictions on teachers
- j. Qualified Teacher Status for teaching positions
- k. Prohibition from teaching checks for teaching positions
- l. Prohibition from management checks (Section 128 Check) for Senior Leaders, Board Level and Governance appointees

Note: People who are barred from working with children will never be offered employment with the Lioncare Group. Relevant authorities will be notified that the barred person has attempted to seek employment working with children.

Formal Offer of post

The Executive Director writes a formal letter of conditional offer to the successful candidate stating the basic terms and conditions of employment and given in accordance with the terms of the Employment Rights Act 1996, Employment Act 2002 and Working Time Regulations 1998, and including starting basic salary and pay, hours of employment, position, work base and other relevant details. They are asked to provide a written formal response to the Executive Director of their intentions regarding taking up employment.

Creation of single central record entry

After the candidate accepts their post and before they take up work with The Lioncare Group the details of all the above checks will be entered on to;

- a. For all those employed to work at or in connection to the School: The Single Central Record held and maintained by the school (relevant details are also held on the Personnel Database maintained from Lioncare House)
- b. For all other employees: the Personnel Database held and maintained from Lioncare House

The Administrators at Lioncare House and/or at The Lioncare School take formal responsibility for over-seeing the recruitment of the candidate from this point until they start induction. The Administrators at Lioncare House prepare a standardised digital Personnel File, stored securely on the Share Drive at Lioncare House. All enquires relating to the recruitment and employment process from herein are directed to Administrators.

New employees commence employment only after the Executive Director is satisfied that all references, checks, ID, and documentation are complete and in order, including confirmation of the right to work in the UK and in the case

Start of work and Induction

We are aware how difficult it can feel adjusting to a new workplace, a new team of colleagues, and a new group of children to work with, while learning about the specialist ethos and culture of our therapeutic practice model. Therefore our induction programme offers planned support in the initial few months of a new colleague's employment.

Newly appointed employees are assigned a named supporter / mentor to help show them the ropes, and our open-door policy means they can seek advice or information or help when they need it. We hope that from the very beginning, all colleagues can be and feel part of creating and maintaining a healthy culture of enquiry and challenge.

Initial induction includes Safeguarding and Child Protection coaching and training, an introduction to Health and Safety practice including Risk Assessment and Management policies and procedures, and access to the Employee Handbook including (for school-based colleagues) the Staff Code of Conduct. Secure login access for the newly recruited employee is also set up on the organisation's records management systems (GDrive, ClearCareSolutions and BehaviourWatch) and instruction is given in safe records management.

New starters are supported to make full use of daily team debriefs and one to one supervision sessions (held more frequently at the start of employment and then on an agreed frequency thereafter – see Supervision and Induction Policy) to explore their role and reflect on their practice, and to work with their colleagues to make induction a meaningful learning experience. At the end of six months, an End of Probation Performance Review is carried out to confirm permanent employment status.

Disposal of Personal Information

In line with the Data Protection Act, information relating to unsuccessful candidates is destroyed and deleted upon completion of the recruitment process. Information obtained from equal opportunity monitoring systems is entered in an anonymous format on to a central computer database held securely at Lioncare House, and is used solely for the purpose of monitoring good practice.

Variations in Relation to The Lioncare School

The following groups of adults may work in school on regulated and non-regulated activities and below are the specific recruitment arrangements for these groups. Further details on the arrangements for safeguarding children around specific groups of adults can be found in the School's Safeguarding and Child Protection Policy available on the website and the Policy and Procedure section of the GDrive.

Volunteers: The Lioncare School does not specifically recruit volunteers to work with children and young people. If volunteer work was sought in the school by an individual it would be risked assessed and appropriate pre-employment checks undertaken

Professional and Trainee Placements: The Lioncare School is a popular setting for a number of further and higher education students to undertake placements. Any placements are organised with the placing Institution and the individual concerned, and are risk assessed, and subject to appropriate checks.

Senior Leaders, Board Level and Governance appointees: Senior Leaders in The Lioncare Group are recruited according to the Lioncare Recruitment Policy and have been subject to all pre-employment checks. In addition they will have section 128 checks to ensure they have not been barred from the management of a school. New Board members and those in Governance roles may not be employees of the organisation but are nonetheless appropriately checked through the disclosure and Barring Service and are subject to a section 128 check

Agency staff: The Lioncare School does not use short term agency staff but on the occasion where agency staff are used to cover long term absence there is an interview process and the agency submits a Candidate Profile as part of the business agreement between companies, testifying that pre-employment checks have been undertaken. This document includes the dates of checks and details such as the Enhanced DBS certificate reference number. A check is also carried out to confirm that the agency staff member is qualified and sufficiently experienced to undertake the work they will be asked to perform

Adults employed by the Lioncare Group and working temporarily in School: Administrative, maintenance and residential care staff work in school on an occasional basis to support a number of aspects of school life. These staff are recruited under the Lioncare Recruitment Policy and subject to relevant pre-employment checks however their details are not held on the Single Central Record of school employees , but are held on the personnel database and personnel files at the organisation's central office (Lioncare House).

Related Policies

The following Policies and Procedures of The Lioncare Group provide further detail of how the welfare of children and young people is promoted and how they are protected from harm:

- Safeguarding Policy
- Whistle Blowing
- Online Safety
- The Lioncare School Safer Recruitment Policy 2017-18

This policy also has direct links to;

- The Lioncare School Code of Conduct
- The Lioncare Group's Employee Handbook