

Libra

Policies and Procedures

Coordinator Julie Farr

Principal Kirsty Crosby

Nominated Director Joan Wilkes

Last Review Date 05.03.22

Next Review Due 01.03.23

Mid-year updates

Safer Recruitment

Internal Safeguarding Contacts	Home	Mobile
Designated Safeguarding Lead – Gina Dyer	01643 702468	07854 865914
Deputy Designated Safeguarding Lead – Clive Crosby	01643 707666	07966 031357
Abi Staff (2 nd Deputy School Safeguarding Lead)	01271 830898	07837 673717
Stacy Ward (2 nd Deputy Care Safeguarding Lead	01271 866945	07557 797312
Nominated Director for Safeguarding	01643 863099	07725 628824
NSPCC Whistle-blowing Helpline	0800 028 0285	help@nspcc.org.uk
Director: Person to contact regarding concerns about the Principal	01643 863099	07725 628824
Childline	Help for Adults Concerned about a child: 0808 800 5000 0800 1111 / childline.org.uk	
Please refer to our Safeguarding Policy for all other Local Authority contact details		

Safer Recruitment in Education

We are aware that ‘Governing bodies and proprietors should ensure there are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children’s welfare.’ (Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges (DfE 2021))

We are committed to safeguarding children and promoting the welfare of children and young people and we expect all staff and volunteers to share in this commitment.

We believe that by creating a culture of safe recruitment by undertaking robust and rigorous processes we will deter, reject or identify people who might abuse children from gaining positions within the school and thereby ensure that the workforce is fully committed to the safe welfare of children.

We ensure that at least one panel member who conducts an interview has completed safer recruitment training. All decisions about the suitability of a prospective employee are based on checks and evidence, including criminal record checks (Disclosure and Barring Service (DBS) checks), barred list checks and prohibition checks, together with references and interview information.

We understand that there are three types of DBS checks:

- **Standard:** this provides information about convictions, cautions, reprimands and warnings held on the Police National Computer (PNC), regardless or not of whether they are spent under the Rehabilitation of Offenders Act 1974. The law allows for certain old and minor matters to be filtered out;
- **Enhanced:** this provides the same information as a standard check, plus any approved information held by the police which a chief officer reasonably believes to be relevant and considers ought to be disclosed; and

- **Enhanced with barred list check:** where people are working or seeking to work in regulated activity with children, this allows an additional check to be made as to whether the person appears on the children's barred list.

We are aware the DBS:

- maintains barred list of individuals who are unsuitable to work with children and vulnerable adults;
- will send a DBS certificate to the applicant once the checks are complete. The applicant must show the original certificate to their potential employer before they take up post or as soon as practicable afterwards

Under no circumstance will we allow any individual to carry out any form of regulated activity if we know or have reason to believe that that individual is barred.

We understand that from 1 April 2021:

- standalone checks of the children's barred list will be administered by the Teaching Regulation Agency (TRA) on behalf of the DfE which means that standalone barred list checks can no longer be obtained from TP Online or from the various umbrella bodies and supply agencies who currently sell these checks;
- schools need to ensure that they see the original (paper) DBS certificate for all new appointments in regulated activity with children. A digital certificate or letter of clearance is not acceptable;
- if the appointee is transferring directly from another school in England without a break in service of three months or more, the appointing school can undertake a stand-alone barred list using the TRA website.

We ensure that we maintain a single central record (either in paper or electronic form) of pre-appointment checks (single central record) and covers:

- all staff, including teacher trainees on salaried routes, agency and third party supply staff who work at the school;
- for independent schools, all members of the proprietor body.

The single central record will record that the following checks have been carried out or certificates have been obtained, and the date on which check has been completed:

- | | |
|--|--|
| ▪ Identity check | ▪ Check of professional qualifications |
| ▪ Barred list check | ▪ Check to establish the person's right to work in the UK |
| ▪ Enhanced DBS check | ▪ Section 128 check for management positions in academies/free schools/independent schools |
| ▪ Prohibition from teaching check | |
| ▪ Further checks on people who have lived or worked outside the UK | |

We ensure for agency and third party supply staff written confirmation is received from the employment business supplying the member that stipulates all relevant checks, appropriate certificates, confirmation dates and enhanced DBS certificates are in place.

We are aware that from 1 January 2021 the Teacher Regulation Agency will no longer maintain a list of European Economic Area teachers with sanctions.

We understand that we must make any further checks that we think appropriate on applicants that have lived or worked outside of the UK, with those applicants providing proof of their past conduct as a teacher issued by their regulating authority in the country they worked.

LIBRA is committed to the guidelines in relation to DfE's 'Working Together to Safeguard Children' in order to safeguard and promote the welfare of children as follows:

- Protecting children from maltreatment;
- Preventing impairment of children's health or development;
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care;
- Taking action to enable all children to have the best outcomes.

Under The Children Act 1989 sections 44 and 47, LIBRA has a duty to promote best practice in terms of the welfare of the children within the home and the school. This part of the 1989 Act stipulates that the welfare of the child is paramount and LIBRA ensures that all the children in their care are protected from significant harm.

Under The Children Act 2004, LIBRA has a duty to co-operate with the Local Authority in order to improve the wellbeing of the children in their care.

Safeguarding: Statement, Commitment and Responsibility

As an organisation, LIBRA has an ongoing commitment through its duty of care to protect children from harm. The company's Safer Recruitment Policy and Procedures, in-depth Safeguarding Policy and Procedures and Staffing Policy, together with the guidance provided by the Government, Local Authorities, DfE, Ofsted and the Disclosure and Barring Service and Police help the company make safer, more informed recruitment decisions and ensure that people do not have a history that would make them unsuitable for the post they fill. Most of the company's employees will have regular contact with children or are in a position of trust and therefore it is company policy that all employed staff be vetted.

The role of LIBRA as an independent organisation in relation to Safeguarding, is the same as any other residential home or school and LIBRA has a clear duty to co-operate with the Placing Authority and the Local Authority Designated Officer (LADO). LIBRA has an on-going commitment to the safeguarding and welfare of children in its care, we ensure that we are up to date with all local and national legislation. Please refer to Libra's Safeguarding Policy and Libra's Child Protection Flowcharts for Devon and Somerset.

LIBRA has a Designated Person who will undertake the role of Safeguarding and will liaise closely with the Local Authority Designated Officer (LADO) within the areas of Somerset and the Multi Agency Safeguarding Hub (MASH) in Devon. Our Designated Person (lead) is Gina Dyer who will also support staff members to carry out their safeguarding duties. Gina Dyer undergoes updated child protection training at least every two years.

In accordance with the 'Teacher Standards 2012' Libra's Principal and Teaching staff safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties, this area is covered during interviews, appraisals, observations, induction training as well as ongoing professional training throughout the company.

All staff undergo an Enhanced DBS check* with barred list information (when in regulated activity) and are required to join the DBS Update Service* or are subject to the equivalent check for those who have lived outside the United Kingdom via the relevant country of residence. Anyone who is appointed to carry out teaching work will require an additional check to ensure they are not prohibited from teaching. Libra diligently obtain references and other interview information for all prospective employees and taking all performed checks and actions into account, Libra believe that this will help prevent, reject or identify those people who might abuse children. Libra is supported by a specialised employment law firm for all recruitment advice and guidance. Libra believes that safer recruitment does not end at appointment, it is continuous monitoring of employee behaviour from pre-appointment and induction onwards to prevent abuse or inappropriate behaviour occurring in our workplace. We also believe that our recruitment and selection process is systematic, efficient, effective and equal.

* Please refer to our Disclosure and Barring Service Checks Policy for full details.

We realise that the majority of appointments are for staff who will be responsible for the care and supervision of children on a regular basis known as regulated activity and as part of the process of safe recruitment all prospective employees will need to have an enhanced DBS check with barred list information before they take up their post. Please refer to the full and strict procedures and processes in Libra's 'Disclosure and Barring Service Checks Policy'. Under no circumstances will we allow any individual to carry out any form of regulated activity if it comes to our attention that they have been barred.

Also, we are aware that we have "a legal duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

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

(Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges (DfE))

We have a duty to ensure that all volunteers in regulated activity must have an enhanced DBS certificate with barred list check. We will not allow any volunteer to work unsupervised with children or work in regulated activity without the necessary checks.

We wish to appoint the most suitable person for each vacant position regardless of age or perceived age, marital status, sex, racial or ethnic background, religion or belief, sexual orientation or disability. Also, we will take no account of an applicant's membership or non membership of a trade union. We work hard to create and maintain a skilled, balanced, conscientious, diverse and committed staff that reflects the diversity of the local community.

We intend to deter prospective applicants and to identify and reject applicants who are unsuitable to work with children. Existing employees, employees on fixed or temporary contracts will be invited to apply. This extends to incorporate our duties to identify, protect and support those who might be vulnerable to being radicalised or influenced by extremist views, we

include a specific question in our interview notes that asks each candidate their views, understanding and opinions relating to Extremism and Radicalisation in order for the panel to explore any identified 'danger signs'.

We are committed to safeguarding and promoting the welfare of all children as the safety and protection of children is of paramount importance to everyone in this school. We work hard to create a culture of vigilance and at all times we will ensure what is best in the interests of all children.

We believe that all children have the right to be safe in our society. We recognise that we have a duty to ensure arrangements are in place for safeguarding and promoting the welfare of children by creating a positive school atmosphere through our teaching and learning, pastoral support and care for both pupils and staff, training for staff and with working with parents. We teach all our children about safeguarding.

We work hard to ensure that everyone keeps careful watch throughout the school and in everything we do for possible dangers or difficulties. We want all children to feel safe at all times. We want to hear their views of how we can improve all aspects of safeguarding and from the evidence gained we put into place all necessary improvements.

We believe our recruitment and selection process is systematic, efficient, effective and equal.

We are aware that schools are finding it difficult to recruit and retain teaching staff, support staff and school leaders. We recognise that recruiting and retaining the right staff is at the centre of providing a quality learning experience for pupils.

A recent survey has shown that low pay, high workload and stress are the three main reasons why teachers are leaving the profession. Therefore, we aim to retain and further develop high quality teaching and support staff to ensure quality learning experiences for pupils by reducing unproductive or unnecessary teacher workload associated with marking, planning or tracking pupil progress that does not contribute to the raising of pupil standards.

We recognise the importance of ensuring all staff enjoy a reasonable balance between their working life and their out of school commitments and interests. It is not in the interests of either the company or the individual for any employee to work excessively without complementary rest or recreation. We are committed to ensuring that positive steps are taken to promote a healthy work-life balance for all staff.

We recognise the importance of promoting and supporting the health and well-being of all staff as we wish to improve moral, job enrichment, the quality of work life and the continuous improvement of educational achievement.

We are aware that the General Data Protection Regulations (GDPR) will entirely replace the current Data Protection Act (DPA) by making radical changes to many existing data protection rules and regulations that schools, academies and other educational establishments adhere to under the DPA. The principal aim of the GDPR is to strengthen and unify the safety and security of all data held within an organisation.

We acknowledge the new guidance given to all schools in the 'Data protection: a toolkit for schools' (DfE April 2018) regarding the appropriate use of personal data.

We wish to work closely with the School Council and to hear their views and opinions as we acknowledge and support Article 12 of the United Nations Convention on the Rights of the Child that children should be encouraged to form and to express their views. This can be witnessed through the feedback that the company receives via Shadow day forms completed by young people and is used as part of the selection process.

We as a school community have a commitment to promote equality. Therefore, an equality impact assessment has been undertaken and we believe this policy is in line with the Equality Act 2010.

We all have a responsibility to ensure equality permeates in to all aspects of school life and that everyone is treated equally irrespective of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. We want everyone connected with this school to feel safe, secure, valued and of equal worth.

We acknowledge the findings of the Race Disparity Audit that clearly shows how people of different ethnicities are treated across the public services of health, education, employment and the criminal justice system.

The educational section of the audit that covers: differences by region; attainment and economic disadvantage; exclusions and abuse; and destinations, has a significant importance for the strategic planning of this school.

We believe it is essential that this policy clearly identifies and outlines the roles and responsibilities of all those involved in the procedures and arrangements that is connected with this policy.

We believe this school policy:

- is an essential part of the school;
- supports staff in managing certain situations;
- forms an important framework that will ensure consistency in applying values and principles throughout the establishment;
- provides guidance, consistency, accountability, efficiency, and clarity on how the school operates;
- provides a roadmap for day-to-day operations;
- ensures compliance with laws and regulations, gives guidance for decision-making, and streamlining internal processes;
- is designed to influence and determine all major decisions, actions and all activities taking place within the boundaries set by them;
- stems from the school's vision and objectives which are formed in strategic management meetings.

Multi Agency Working

Libra will contribute pro-actively and positively to multi agency working in line with statutory guidance (Working Together to Safeguard Children). Libra are aware of the new safeguarding partner arrangements that came into effect in September 2019.

New Safeguarding Partners and Child Death review partner arrangements include three local Safeguarding partners:

- The Local Authority;
- A Clinical Commissioning Group for an area within the Local Authority;
- The Chief Officer of Police for a police area in the Local Authority area.

The above will make arrangements to work together with appropriate relevant agencies to safeguard and promote the welfare of local children, including identifying and responding to their needs. The three Safeguarding Partners will make arrangements to allow us to be fully engaged, involved and included in the new safeguarding arrangements. It is expected that we will be a 'relevant agency' who will be able to reach their own conclusions on how best to achieve the active engagement of individual institutions in a meaningful way. If named as a 'relevant agency' Libra will adhere to the statutory duty to co-operate with the published arrangements.

We will work with Social Care, the Police, Health Services and other services to promote the welfare of children and protect them from harm. This includes providing a co-ordinated offer of early help when additional needs of children are identified (see 'Early Help'). We will contribute to inter-agency plans to provide additional support to children subject to child protection plans. We will allow access for children's social care from the host local authority and, where appropriate from a placing local authority, for that authority to conduct, or to consider whether to conduct, a section 17 or section 47 assessment.

Aims

- To ensure compliance with all current guidance from the Department of Education and legal requirements.
- To ensure the practice of safe recruitment of school Staff and volunteer helpers.
- To recruit and retain the right staff in order to provide quality learning experiences for pupils.
- To ensure that a fair and legal recruitment procedure is in place.
- To have in place a single central record of pre-appointment checks (single central record).
- To work with other schools to share good practice in order to improve this policy.

Responsibility for the Policy and Procedure

Role of the Directors

The Directors have:

- the responsibility of ensuring that the safe recruitment process complies with all current guidance and legal requirements;
- the responsibility of considering the retention of staff;
- delegated certain powers and responsibilities to the Principal to oversee compliance with current guidance and legal requirements;
- in place a single central record which is regularly reviewed by Senior Management Staff including the Designated Safeguarding Lead.

- recognised and accept their responsibilities to ensure adherence to the DBS Code of Practice in connection with the use of information provided to the company. The company uses an Umbrella Body in order to undertake DBS checks. From time to time the company may change the nominated Umbrella Body, currently the company uses the services of First Advantage.
- delegated powers and responsibilities to the Principal to ensure all school Staff and visitors to the school are aware of and comply with this policy;
- responsibility for ensuring that the school complies with all equalities legislation;
- nominated a designated Equalities Manager to ensure that appropriate action will be taken to deal with all prejudice related incidents or incidents which are a breach of this policy;
- responsibility for ensuring funding is in place to support this policy;
- responsibility for ensuring this policy and all policies are maintained and updated regularly;
- responsibility for ensuring all policies are made available to parents;
- the responsibility of involving the School Council in the development, approval, implementation and review of this policy;
- committed to ensuring that any information obtained is used fairly, is handled correctly and retained for only as long as necessary to adhere to all relevant guidelines.
- The Company follows the DfE's statutory guidance 'Keeping children safe in education' 2021.
- acknowledge their responsibility under the The Protection of Children Act list to:
 - Refer names to the Secretary of State in certain circumstances for possible inclusion on the list. Any referrals for consideration for the list will be forwarded by Libra's Designated Officer to the Local Safeguarding Designated Officers (LADO) in Somerset and MASH in Devon.
 - Refer to the Independent Barring Board any person barred from regulated activity relating to Children
 - Check the list when the company proposes to appoint someone to a child care position via the DBS check process.
 - Not employ a person in a child care position if their name is on the list.
 - Ensure that other organisations providing services to the children in the care of Libra have procedures in place to consult the list when appointing staff to work directly with children.
- To nominated an appropriate senior member of staff to visit the school regularly, to liaise with the Principal and the Office Manager to report back to the Directors;
- responsibility for the effective implementation, monitoring and evaluation of this policy

Role of the Principal

The Principal will:

- promote the safeguarding and welfare of children;
- work in conjunction with the Senior Management Team to ensure all staff, pupils and parents are aware of and comply with this policy;
- ensure the school operates safe recruitment procedures;
- organise safe recruitment training for school Staff involved in recruitment;
- ensure that appointment panels include one person who has successfully passed safe recruitment training;
- ensure all appropriate pre-employment checks are completed on school Staff and volunteer helpers;
- ensure contractors and agencies comply with this policy;
- undertake appointments of school Staff and volunteer helpers other than appointments to the leadership group;

- The Company follows the DfE's statutory guidance 'Keeping children safe in education' 2021.
- provide guidance, support and training to all staff;
- provide leadership and vision in respect of equality;
- ask the Directors to consider a case for retaining any member of staff regardless of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
- look at ways with the Senior Management Team to retain valued staff by considering the following:
 - ☐ Reducing workload as much as possible by ensuring that workload is regularly reviewed and discussed with all staff.
 - ☐ Improving in-school support for teachers by reducing feelings of pressure in terms of scrutiny, accountability and workload from the Senior Management Team.
 - ☐ Looking at ways to ensure greater progression opportunities.
 - ☐ Improving worklife balance and working conditions by considering introducing flexible working and part-time contracts.
 - ☐ Allowing teachers more freedom to mark and plan.
- monitor the effectiveness of this policy;
- annually report to the Directors on the success and development of this policy

Safe Recruitment Procedure

The recruitment process begins when it is identified that we need someone new in the company, either because an existing staff member has left, or because there is new work to be done. The Directors, along with the Director of Care, Principal and School Manager discuss the specific requirements of a post including salary, qualification, job description and person specification which incorporate Libra's Safeguarding Policies and Procedures.

It does not finish until after the appointment has been made, the member of staff has been inducted and the person responsible for the recruitment process has reflected on any changes that should be made in future recruitment drives.

The following points outline the key stages of the recruitment process:

- Manage the response
- Short list candidates from fully completed Application Forms
- Arrange interviews, advise the panel of any discrepancies, including completion of a Safeguarding Form and Numeracy and Literacy Test.
- Take up references (before interview) which include specific questions to assess the applicant's suitability to work with children including specific questions on disciplinary offences and allegations relating to children.
- Obtain, review, scrutinise application forms including chronological history and ensure candidates complete and provide evidence of overseas checks where necessary (for any country where the candidate has lived or work in excess of 6 months – and less than 8 years ago).
- Obtain, review, scrutinise identity documentation supplied – must include all evidence of any name changes.
- Conduct the interviews including completion of the Interview Question Sheet by the panel for each candidate (and Mock lessons – for teaching staff only)
- Shadowing days (where applicable for positions that require staff to directly work with children)

- Second interview (where required)
- Make the decision
- Convey the decision
- Make the appointment including all pre-employment checks, Enhanced DBS checks, Suitability to Work (Disqualification by Association) / NCTL prohibition check / employing Teachers from overseas – effective from Jan 2021 / check whether the individual has been barred by the Secretary of State from taking part in the management of an independent school. This may be done through the DBS barred list checking process which now includes bars from taking part in management, except when the individual is not in regulated activity, in which case the NCTL prohibitions list must be used instead (this list is obtained from the Employer Access website by direct download, not through the search function) / verify the candidate's mental / physical fitness to carry out their work responsibilities (A job applicant can be asked relevant questions about disability and health in order to establish whether they have the physical and mental capacity for the specific role) / Right to work in the UK / Verify Professional Qualifications
- Arrange induction

For a much more in depth list of this process, please refer to 'recruitment checklist MASTER' document through the admin/recruitment team.

Job Description

For every vacancy a job description is prepared which makes reference to the responsibility for safeguarding and promoting the welfare of children and that the person specification includes specific reference to suitability to work with children. See Roles, Responsibilities and Accountability section.

Job advertisement

The company utilises internal emails for advertising vacant positions for present staff to apply. We mainly use online recruitment websites: Devon jobs, DAS Somerset jobs, Indeed and Reed.co.uk

However, for each recruitment drive we are continuously looking at other advertising avenues, such as local newspapers, magazines and agencies.

Advertising is based on cost and distribution areas relating to the nature of the post (see 'Recruitment Advertising' document) for information relating to distribution and approximate costs). The relevant members of the recruitment team then discuss advert text based on the job description, taking into account equality, the disability and discrimination act, Libra's Safeguarding Policies and Procedures, DBS requirements as well as the duration of advert and the deadline for applications.

A draft advert is prepared by the admin team and once approved is submitted to the relevant advertising firm(s) according to deadlines. Where time allows it is company policy to request a proof for checking.

All recruitment advertisements include the wording "Libra is committed to safeguarding and promoting the welfare of children and applicants must be willing to undergo child protection screening appropriate to the post, including reference checks with past employers. This post is identified as being within the scope of Regulated Activity and requires a cleared Enhanced

Disclosure from the Disclosure and Barring Agency. As such all previous criminal convictions deemed to be expired under the Rehabilitation of Offenders Act are required to be declared, this may not negate the applicant from being appointed.”

Application Pack

Application packs are requested by email, telephone, post or in person. We now have the facility to advertise posts on our website and interested applicants can download the appropriate information accordingly. The admin team receive the requests and despatch the packs at their earliest convenience, the aim is for a same day reply, the preferred option is by email but otherwise if requested, it may be posted to or collected by the applicant. An Application Pack Request table has been produced to log details of application packs that are requested.

The application pack consists of: Application form (containing a common set of core data)

Job Description

Explanatory Note – containing details regarding child protection policy, procedures and police checks

Most recent Ofsted Inspection Report

Safeguarding Policy

Safer Recruitment Policy

Example Contract

Applications will only be accepted from candidates completing the Application Form in full and this is stated on the form itself.

Accordingly, all posts within the company are exempt from the Rehabilitation of Offenders Act 1974 and therefore all convictions, cautions and bind-overs, including those regarded as ‘spent’ must be declared. Staff are advised that any convictions, cautions, bindovers, reprimands or non-conviction information such as being investigated or interviewed by the Police incurred during their employment must be declared at the earliest convenience to Libra Management. This will be reviewed by the Senior Management Team accordingly. It may be deemed necessary to raise a Risk Assessment or monitor developments, depending on the nature of the situation.

LIBRA does not accept portability regarding DBS checks, for further details please refer to our Disclosure and Barring Service Checks Policy ‘Storage, handling, retention and disposal of Disclosure information and Portability’.

All application forms contain a section to inform applicants that the provision of false information is an offence and could result in the application being rejected or summarily dismissed if the applicant has been selected, and possible referral to the police and/or DfE Children’s Safeguarding Operation Unit. See Safeguarding Policy and Procedures for full details.

All application forms make applicants aware that all posts at LIBRA involve the responsibility for safeguarding children, although the extent of that responsibility will vary according to the nature of the post and major responsibilities will be detailed in the job description. The form re-iterates that the successful candidate will be required to undertake an Enhanced DBS check with barred list information (when in regulated activity) as well as the necessity to join the DBS Update Service. There is also a section highlighting the requirement to undertake any relevant police checks for Foreign Nationals or those who have lived/worked abroad.

Libra recruitment team acknowledge and reply to all applications within two weeks.

Checking applications and shortlisting

On receipt of applications, it is standard procedure for the School Administrator and School Manager to check through the paperwork supplied to ensure all requirements have been received, completed fully and any mistakes or omissions clarified with the applicant before forwarding the pack to the panel for consideration. Where necessary it might be required to return the paperwork to the applicant for further attention for instance, where it is not signed, or the application form declaration has not been complete.

The application form should contain a full chronology of employment/education history/experience (including both month and year information) and this is checked for any gaps on receipt. The candidate will be advised of any gap(s) and explanation(s) requested. The shortlisting panel can see any errors as highlighted on the application form by the admin team which will then be discussed at interview if deemed necessary, then ultimately stored with the recruitment paperwork on the Staff file. Any discrepancies, errors or gaps on the application form are resolved prior to any offer of employment.

The shortlisting panel look at all applications and will short list applicants if they suit the job description by completing the shortlisting form. The guidelines established for the ages of staff working with children are adhered to and no member of staff works with a child unless they are at least four years older than the oldest child accommodated.

For child protection/safeguarding purposes, reasons for a history of repeated changes of employment, without any clear career or salary progression, or a mid-career move from a permanent post to supply teaching/temporary work (for example) would also be explored and verified.

The application form is numbered in date received order and details of the applicant are entered on to the Recruitment Log which tracks the progress each individual candidate makes right through until offer of employment or unsuccessful. This form is retained for future reference as a tracking tool.

Invitation to Interview

The invitation to interview letter/email includes:

- confirmation of the interview date and time
- location and a map with directions
- (a second copy of the) Explanatory Note
- an example of the post's contract so that the candidate can make an informed decision
- (a second copy of the) school's most recent Ofsted Inspection Report
- (a second copy of the) Safeguarding Policy
- (a second copy of the) Safer Recruitment Policy

It also asks if the candidate has any special requirements (for instance mobility issues) in order that we can organise the appropriate PEEP.

Candidate's invited to interview are informed that they will have to complete a Numeracy and Literacy Test (consisting of 20 questions with multiple choice answers) as well as a Safeguarding

form to determine their understanding and knowledge of responsibilities relating to child protection.

A second copy of the Explanatory note is sent with the letter highlighting the section 'Invitation to Interview' which refers to them bringing in their professional qualifications and original identification documents as well as containing details regarding child protection policy, procedures and police checks. All candidates invited to interview must bring documents confirming relevant educational and professional qualifications that are necessary or relevant for the post (e.g. the original or certified copy of certificates, diplomas etc).

The HR staff cross references the relevant documents/certificates against the application form and initials where the actual qualifications have been received. Where originals or certified copies are not available for the successful candidate, written confirmation of the relevant qualifications must be obtained from the awarding body.

Where the qualification is a requirement of the post eg qualified teaching award LIBRA staff then verify it via the NCTL Employer Access website, LIBRA contact Higher Education bodies and Colleges for other qualifications that require verification and document their findings accordingly. If a Teacher is from overseas, with effect from January 2021, Libra , follow the DfE guidance: <https://www.gov.uk/guidance/recruit-teachers-from-overseas> Additionally, candidates will be asked to provide proof of their past conduct as a teacher as issued by the professional regulating authority in the country in which the applicant has worked - where available, this will be considered together with other pre-appointment checks to help assess suitability. Also requested are original identification documents - see Explanatory Note for details of this request and the list of suitable identification is as per the DBS requirements – so that this can save time when organising a DBS check for successful candidates. The admin team will organise copies of these items. If the applicant is unsuccessful, this information will be destroyed. If someone has a different name, the candidate is asked to bring the relevant evidence e.g. deed poll document or marriage certificate.

References

Libra will obtain at least two references, but always aim for three where supplied (work based are always one of the required references – where applicable) on candidates prior to 1st round interviews or shadowing days where applicable (or definitely before 2nd interview if there is any kind of mitigating circumstance delaying the required reference) and may approach previous employers for information to verify particular experience or qualifications prior to interview. Notification of this is given in the application form and will be discussed at interview.

If LIBRA deem a more appropriate referee than those suggested by the candidate - for instance a candidate's employer where the employment was related to working with children rather than a supplied tutor, LIBRA may request this employer as an additional referee as good practice. Libra do not accept 'open references, pre-typed, or 'to whom it may concern' testimonials.

References are sought verbally in the first instance, typed up and posted or emailed as soon as possible to the referee with a job description, stamped addressed envelope (where necessary) and personalised compliment slip asking them to check the details originally supplied, sign and post back. The references are then reviewed by the School Manager, Principal, Director of Care or Director and any concerns are discussed and appropriate action taken. This includes cross referencing the references, against details supplied by the candidate on the application form.

As good practice following receipt of signed references, for verification purposes the recruitment team will make direct contact with the referee in order to re-verify the contents of the provided reference. To avoid any possible fake references, Libra always aim for company landline numbers rather than applicant's supplied mobile numbers when obtaining verbal references and will research the company number to double check the information provided - in an attempt to ensure the referee is a genuine employee at the company you are contacting. We will also take the initiative to ring a switchboard telephone number and ask to be put through to ensure the correct person is reached.

With regard to the returned signed references, we will request that the referee uses a company stamp on the signed reference or returns the reference together with a letterhead or compliment slip (if employer/company based reference) in order to provide evidence that the reference has not been falsified. If any answers provided by the referee are vague, highlight discrepancies when cross-referencing against the candidate's application form, or if they are unspecific or require clarification, it will be followed up by LIBRA recruitment staff.

At least two satisfactory signed references must be completed and on file before the successful candidate takes up their post.

For child protection and safeguarding purposes, referees are asked if there have been any disciplinary action or allegations and if so, whether they involve issues related to the safety and welfare of children or young people. If so, they are asked to provide details that relate to the safety and welfare of children or young people or behaviour towards children or young people, and the outcome of those concerns e.g. whether the allegations or concern was investigated, the conclusion reached, and how the matter was resolved. In addition, they are asked if they are aware of any other reason why the applicant should not work with children. The checking of a teacher's suitability is also checked via the Employer Access Online facility.

For Foreign Nations, or for staff who have lived or worked abroad, one reference will be sought and where possible, obtained from that country.

The Interview

LIBRA always have a minimum of two interviewers and in some cases e.g. for senior or specialist posts, a larger panel might be appropriate. By having two or more interviewers, it allows one member to observe and assess the candidate, and make notes, while the candidate is talking to the other. It also reduces the possibility of any dispute about what was said or asked during the interview. It is company policy that all interviews are held 'face to face'.

The members of LIBRA's interview panels have the necessary experience and at least one will have attained suitable Safer Recruitment training – usually through the NSPCC and hold suitable roles within the company in order to make informed decisions about appointments. The panel will meet before the interviews to reach a consensus about the required standard for the job to which they are appointing, consider issues to be explored with each candidate and who on the panel will ask about each of those and also to agree their assessment criteria in accordance with the person specification.

The panel are supplied in advance with a list of the same questions for each candidate, including previous employment history, work experience, qualifications, knowledge and skills, together with

aptitude and ability, as well as relaying information on the requirements of the post (see Interview Notes), and the issues they will explore with each candidate based on the information provided in the candidate's application including any references obtained by Libra and any shadowing day feedback forms that have been completed. A candidate's response to a question about an issue will determine whether and how that is followed up. The panel ask competence based questions rather than hypothetical questions.

The interview panel also explore:

- The candidate's suitability for the post;
- the candidate's attitude towards children and young people, his/her ability to support the company's agenda for safeguarding and promoting the welfare of children (suitability to work with children) via discussions during interview as well as the Safeguarding Form which is completed at first round interviews – for all posts;
- further clarification on any gaps in the candidate's employment history;
- concerns or discrepancies arising from the information provided by the candidate;
- if the candidate wishes to declare anything in light of the requirement for an Enhanced DBS check.

Before or after the interview, all candidates are asked to complete a Safeguarding Form which covers scenarios and questions regarding Safeguarding. In order to identify, protect and support those who might be vulnerable to being radicalised or influenced by extremist views, we include a specific question on our Safeguarding form that asks each candidate their views, understanding and opinions relating to Extremism and Radicalisation in order that we may explore any identified 'danger signs'.

This is then reviewed by an appropriate experienced Safeguarding officer (usually the DSL) along with the interview panel after the interview has been concluded. The response is vetted for any Danger Signs* as well as initiative, logic and a general impression of the candidate's views and understanding regarding Safeguarding measures. All findings are noted and if Danger signs are identified then the panel take this on board when making their decision regarding the candidate's progress in the recruitment procedure and followed up with the candidate if further clarification is required. In any case, if the candidate is invited back for a second interview, then a copy of the Interview Question Sheet is attached to the 2nd round interview notes for the panel to consider before 2nd interview.

Danger Signs* - examples:

1. The candidate may imply that young people are equal in every way thereby ignoring any disparities of power and authority;
2. There may be an inability to recognise the inherent vulnerability of children from troubled or disadvantaged backgrounds;
3. There may be a tendency to view children in ideal or romanticised terms;
4. The candidate may appear dogmatic, autocratic, arrogant or over confident;
5. The candidate may appear to have an over identification with children and have a lack of apparent appropriate, intimate or supportive relationships with other adults.

All staff also complete a literacy and numeracy test to assess their level of knowledge.

Teaching / Teaching Assistant posts who are successful at interview are asked to teach a mock lesson which is observed by the Principal. The candidate is advised of this requirement in the mock lesson email following their first interview to confirm when, with whom and the subject. Following the mock lesson, a second interview will usually occur immediately afterwards or in some situations at a later date depending on time restraints.

For child protection/safeguarding purposes, candidates are asked (via the Explanatory Note which is part of the Job Application Pack as well as being sent out later with the Invitation to Interview letter) to provide various original identification documents to prove their identity (also for the recruitment staff to complete the necessary checks regarding Legal Right to Work via: <https://www.gov.uk/legal-right-work-uk>:

- Mandatory request: birth certificate and documents to support all name changes*
- a recent photographic identification
- proof of current address
- NI No

*We are aware that it has been reported that some sex offenders are changing their names by deed poll in order to avoid detection during background checks. Therefore, we specifically request this information to cover all name changes from birth up to date.

These are usually documents which can later be used for the purposes of the DBS check verification and are required when they arrive onsite for the first time eg 1st round interview. These documents are checked by the Recruitment team and copied for the file/uploaded to SIMS, or shredded/deleted if the candidate is unsuccessful. A list of all identification provided entered onto the recruitment checklist for each successful applicant. Further documents may be required in order to complete the DBS check with barred list information (when in regulated activity) at a later stage and these will be requested at such time. All candidates are required to supply all relevant qualifications so that further checks and verification can be undertaken.

Depending on the nature of the post or high number of applications, second round interviews might be held, in which case 'Invitation to second interview' letters are despatched.

Shadowing Days

For staff who are going to be directly working with the children and are successful at interview are invited to attend at least one shadowing day (sometimes two) via the 'Shadowing day Invitation' email with full details of what to bring, directions, contact numbers. This is unpaid but gives a real insight into the role and requirements of such a post. Candidates are in effect shadowing an experienced member of our staff and for child protection and safeguarding purposes are not left alone with any of the LIBRA young people. The admin team liaise with the senior management team as to the most appropriate time/person for the Shadowing day to be scheduled and the member of staff, duty managers, senior management team are informed via email of the Shadowing day that is scheduled and the name of the candidate, so that they know to expect them.

The staff and young person(s) complete Shadowing day forms regarding the candidate which are returned to the office for consideration by the panel. If the comments are unsuitable then the candidate is sent an 'Unsuccessful at Shadowing day' letter, but otherwise, they are invited back for a second interview, using the 'Invitation to second interview' email.

Job Offer and Pre-Employment Checks for the Successful Candidate

For child protection and safeguarding purposes, all successful candidates will be required to complete an Enhanced DBS check with barred list information (when in regulated activity) via an online application form through Libra's umbrella body: First Advantage. At that time, they are also required to join the DBS Update Service so that LIBRA may check the validity of their DBS at any stage (with their written consent). Anyone who is appointed to carry out teaching work will require an additional check to ensure they are not prohibited from teaching. Candidates are made aware of this at every stage of the recruitment process. These checks are undertaken as soon after the verbal offer has been made.

Where a successful candidate is currently working with children, on either a paid or voluntary basis, the company will ask current employers via reference forms about disciplinary offences, including disciplinary offences relating to children or young persons (whether the disciplinary sanction is current or time expired), and whether candidates have been the subject of any child safeguarding allegations or concerns and if so the outcome of any enquiry or disciplinary procedure.

If a successful candidate has supplied details of a Conviction/Caution/Reprimand/Warning (on their application form) it will be reviewed by the panel and appropriate action taken where required for instance this could be a minor offence many years ago during the candidate's teenage years and are not assessed as a current risk – if so a risk assessment would be completed. If however, it does affect the role the candidate has applied for, immediate further action would be taken – according to Gov.uk and in line with DBS advice. Libra will review the contents of the sealed envelope as part of our background checks (relating to a Conviction/Caution/Reprimand/Warning) in the most preventative way; namely in line with Babcock, Devon Local Authority and NSPCC advice in that the Staff Declaration form within a sealed envelope supplied by the candidate will not be sent to candidates until **after** shortlisting has occurred, to ensure we are following Equal Rights.

If candidates are not currently working with children but have done so in the past, that previous employer will be asked about those issues. Where neither the candidate's current nor previous employment has involved working with children, the candidate's current employer will still be asked about their suitability to work with children, although it may be where appropriate their answer is "not applicable" if the candidate's duties have not brought them into contact with children or young people.

Any offer to a successful candidate will be conditional upon:

- Verify a candidate's identity, preferably from current photographic ID and proof of address except where, for exceptional reasons none is available;
- Obtain a certificate for an enhanced DBS check with a barred list information (when in regulated activity)
- Candidate's subscription to the DBS Update Service.
- Teachers only: check that the candidate is not subject to a prohibition order issued by the Secretary of State, using the Employer Access Online Service;
- If a Teacher is from overseas, with effect from January 2021, Libra, follow the DfE guidance: <https://www.gov.uk/guidance/recruit-teachers-from-overseas> Additionally, candidates will be asked to provide proof of their past conduct as a teacher as issued by

the professional regulating authority in the country in which the applicant has worked - where available, this will be considered together with other pre-appointment checks to help assess suitability.

- a fully completed application form with live signature
- verification of physical/mental fitness to carry out their work responsibilities.
- Verify the candidate's right to work in the UK.
- If the person has lived or worked outside the UK, request that the candidate undertakes all relevant checks.
- two satisfactory work-based or mutually agreed (eg educational) references covering all child protection questions and disciplinary issues relating to young people.
- verification of qualifications.
- Teachers only: verification of professional status eg QTS.
- Teachers only: verification of successfully completed statutory induction period (as you obtained your QTS after 7 May 1999).
- satisfactory completion of the probationary period.
- Receipt of the original DBS certificate. An enhanced DBS certificate is required and will be obtained from the candidate before or as soon as possible after the person's appointment. We note there is no requirement to obtain an enhanced DBS certificate or carry out checks for events that may have occurred outside the UK if during a period which ended not more than three months before the person's appointment, the applicant has worked in a school in England in a post:
 - which brought the person regularly into contact with children; or
 - to which the person was appointed on or after 12 May 2006 and which did not bring the person regularly into contact with children
- All staff will be required to complete and sign a Staff Suitability Declaration Form before taking up the post (but after shortlisting has occurred), and to review and complete it at 6 monthly intervals thereafter to demonstrate that they are safe to work with children. We have two versions of this form, one contains extra information covering questions regarding "disqualification by association" (see the Section 'Disqualification by Association') this form is only required for those staff working in our residential children's homes, the other version is for 'school only' staff and does not include 'Disqualification by Association'. The Staff Suitability Declaration Form will be reviewed after shortlisting. Any criminal convictions etc will be disclosed via the completion of the application form, the Declaration form serves to provide greater detail for review and probable risk assessment.

Where a candidate is:

- found to be on DfE List 99, or the DBS check with barred list information (when in regulated activity) shows the candidate has been disqualified from working with children by a court, or
- found to have provided false information in, or in support of, their application, or
- the subject of serious expressions of concern as to their suitability to work with children,

The facts will be reported to the Police and/or the DfE Children's Safeguarding Operation Unit. Please refer to Libra's Safeguarding Policies and Procedures and our Disclosure and Barring Service Policy.

A verbal offer of employment is followed up in writing (see 'Offer letter Templates') at the earliest convenience following the verbal contact. For child protection and safeguarding purposes, the

successful candidate is informed of details of the post in the letter and supplied with a list of any further identification required re proof of identity or for DBS check purposes, a Staff file requirements sheet, a medical form and accompanying note, Fire Emergency Action Plan and Emergency Action Plan and a request that they familiarise themselves with the HSE Health & Safety Law Poster and the Fire Risk Assessment during their first 7 days of work. They are also provided with the DfE's most up to date version of: Safer Working Practice for Adults working with Children and Young People as well as the company's own Smoking and Alcohol Policy and Dress Code. Additionally, we will send a medical form, photo consent and HMRC form for payroll purposes. Term dates are sent to those working in school.

It is also requested that the new members of staff visit the office before taking up post to go over administration areas such as holidays, email system, Staff requirements it also allows the candidate to ask any questions or clarify any areas which they are unsure of.

Legal Right to Work in the UK including DBS (equivalent checks) and referencing

For child protection and safeguarding purposes, the identity of all candidates are checked on arrival at first interview. Checks are undertaken using: <https://www.gov.uk/legal-right-work-uk> to ensure that the candidate is legally allowed to Work in the UK. In addition, Libra will undertake any further checks deemed appropriate so that any relevant events that occurred outside the UK can be considered. All other nationalities (appointed after 31 December 2020) will need to evidence their right to work in the UK through a following means: Settled/Pre settled status (A passport or EU Identity card can continue to be accepted up until 30th June 2021, providing the EU citizen was living in the UK prior to 31st December 2020). Other Immigration Document evidencing Right to Work in the UK i.e. Biometric Residence Permit.

So that candidates are aware of this requirement, the invitation to interview correspondence contains the request for them to bring with them suitable (photographic) identification or paperwork to cover this necessity. If there is uncertainty about whether an individual needs permission to work in the UK, then LIBRA will follow advice on the Gov.uk website.

All staff undergo an Enhanced DBS check with barred list information (when in regulated activity) and are required to join the DBS Update Service or are subject to the equivalent check for those who have lived outside the United Kingdom via the relevant country of residence by contacting the relevant Foreign Embassy for the appropriate forms and guidance. It is also practice to request a 'Certificate of Good Conduct' also known as a 'Certificate of No Criminal Conviction' or 'Police Clearance Certificate' supplied by the country of residence, candidates can obtain this via guidance from the Foreign and Commonwealth Office.

If the country in question has no available police checks and/or a reference is not possible, you must risk assess and put in place additional safeguards (such as a more specific induction, shadowing, being supervised for longer than you perhaps would normally, thinking about whether some pupils are more or less vulnerable. To obtain information in this regard, Libra refers to the Home Office website about the police checks available in each country and also identifies those where there are no appropriate arrangements.

If further guidance is required on checking the criminal records of people who have lived overseas, LIBRA will refer to The Centre for the Protection of National Infrastructure (CPNI) and the website Gov.uk. LIBRA will take all relevant steps it deems appropriate in this regard until it is sufficiently satisfied that the candidate is fully able to work in the UK.

For Foreign Nationals, or for staff who have lived or worked abroad, one reference will be obtained from that country. Libra follows and issue guidance from: <https://www.gov.uk/government/publications/criminal-records-checks-for-overseas-applicants>

Employing a Teacher from Overseas

If a Teacher is from overseas, with effect from January 2021, Libra follow the DfE guidance: <https://www.gov.uk/guidance/recruit-teachers-from-overseas> Additionally, candidates will be asked to provide proof of their past conduct as a teacher as issued by the professional regulating authority in the country in which the applicant has worked - where available, this will be considered together with other pre-appointment checks to help assess suitability.

Overseas trained teachers

In line with safeguarding measures, staff will be required to provide an original UK NARIC check to establish their qualifications are equivalent to the UK, this document will then be verified and filed. Libra follows guidance from: <https://www.gov.uk/government/publications/employing-overseas-trained-teachers-from-outside-the-eea>

Prohibition Check

All staff employed for teaching work will require an additional safeguarding check to ensure they are not prohibited from teaching. Prohibition orders are made by The Secretary of State which prevent a person from carrying out teaching work in schools (and other education establishments). Any person who is prohibited from teaching must not be appointed to work as a teacher in such a setting. Libra check prohibition status by the Employer Access Online Service, further guidance can be found in the NCTL publication 'Teacher misconduct: the prohibition of teachers'.

Disqualification by Association

The Childcare (Disqualification) Regulations 2009 applies to those employed to provide childcare to children who have not attained the age of 8. The requirement for the checks includes our Principal and other members of the school's leadership team and any manager, supervisor, leader who is responsible for the day-to-day management of the provision.

Libra is aware of its safeguarding responsibility to ensure that the company does not knowingly employ a person who is disqualified under the 2009 Regulations. Libra will make sure that contractors are compliant with the requirements of this legislation.

Taking into account the DfE guidance 'Disqualification under the Childcare Act 2006, Feb 2015' LIBRA will assess which staff it applies to and will ensure that they are aware of the legislation including that they may be disqualified 'by association' under regulation 9 of the 2009 Regulations where they live in the same household as a disqualified person or in a household in which a disqualified person is employed.

With regards to Disqualification by Association, LIBRA ensures that staff (only those working in our residential children's home) are aware of what information will be required of them and how it will be used to make decisions about disqualification. This occurs via the application form, Job Offer letter, the Staff Handbook, Staff Contracts, the 'Read, Received and Responsibilities' form and is also contained within the Safeguarding Policy which staff are directed to via the 'Read,

Received and Responsibilities' form through Parago. Staff are also required at 6 monthly reviews to declare any updates using the Staff Suitability Declaration form.

In order to comply with the Data Protection Act, Libra does not ask staff of third parties to make requests for their criminal records in connection with employment. Where Libra is required to retain personal information, this will be stored securely on the Staff file and information that is not relevant will be destroyed.

Libra retains a record of those staff who are employed to work in or manage relevant childcare and record the date on which disqualification checks were completed. The record forms part of the Single Central Record does not include personal or sensitive data about household members without their consent. Accurate information only is retained, kept to a minimum and is stored for the minimum period of time necessary.

Libra will assess any caution and conviction information that is received in the first instance via our lead Safeguarding Officer Gina Dyer and if further professional advice is required, we may contact the Devon or Somerset LADO to establish whether the member of staff is disqualified from working in relevant childcare.

Where Libra receives information and are satisfied that an individual working in a relevant setting falls within one of the disqualification criteria in the 2009 Regulations we will immediately inform Ofsted using disqualification@ofsted.gov.uk the relevant individual will be informed that this contact has been made and explain the implications of disqualification to the individual, including whether they can apply to Ofsted for a waiver of disqualification, we will also make clear what information the individual will need to share with Ofsted and why. At this point Libra will assess whether it needs to take any further professional advice. Libra will direct the individual to the Ofsted fact sheet (<https://www.gov.uk/government/publications/applying-to-waive-disqualification-early-years-and-childcare-providers>)

Libra will not continue to employ an individual who is disqualified, including 'by association' in connection with later years childcare provision. Should Libra contemplate the individual working in a different setting, it will take into account the risk of harm to children concerned carefully consider our obligations under the 2006 Act and research any other relevant safeguarding guidance before making a decision regarding deployment.

If a waiver is under consideration, Libra will decide whether it is appropriate or not to redeploy staff elsewhere in the school. Where alternative arrangements cannot be made Libra will consider whether to grant paid leave or similar, as a last resort suspend the member of staff. Where deemed necessary, Libra will take appropriate professional advice.

Section 128 checks

Libra will carry out Section 128 checks for all Directors via the Employer Secure Access portal via the Teaching Regulation Agency (TRA) Teacher Services' web page and update the Single Central Register accordingly. This check is also required for anyone holding a role that is on the management team at Libra (being an Independent School). This information can be found as mentioned above, but can also be seen where 'children's workforce independent schools' is specified in the perimeters of an Enhanced DBS check (which all of the Management Team inc Directors are required to have).

Medical Form

To comply with Ofsted's requirement 'Inspectors should ensure that the company has satisfied itself of the physical and mental fitness of their staff after the appointment has been confirmed', we ask all successful candidates to complete a medical form which we believe contains questions which are targeted, relevant and job related. This form accompanies the job offer letter and the verification of suitable fitness is a condition of the employment. All staff employed post 2003 have medical forms on their file. The medical form is then initially reviewed by the School Manager and Principal, if any concerns are raised the staff members line manager will conduct a review of the form to establish if any actions need to be put in place.

Agency/Supply Staff and Volunteers

For child protection and safeguarding purposes, agency/supply staff, volunteers, trainee/student teachers are treated the same as all other employed staff. They are asked to complete the usual LIBRA application form, attend for interview and references are undertaken regardless of any that have been previously supplied (by the agency for instance), they too are informed of child protection/safeguarding policy at each stage of their application. The application is checked in the usual way to ensure there are no errors and that it has been fully completed with no gaps in history of employment/education. The standard forms to determine that they are eligible to work in the UK are also completed. At Libra Volunteers are not permitted to work unsupervised with children.

As good practice, LIBRA have decided to proceed with their own Enhanced DBS check with barred list information (when in regulated activity), for any agency/supply staff it employs. An Enhanced DBS is also undertaken for Volunteers however, no barred list information is sought – as this is not legally allowed for volunteers. This removes relying upon a DBS check which has been organised by someone else. By raising the DBS form in house, it covers the requirement to check the person's identity by sight of original documentation. Sight of original relevant qualifications are also sought.

In order to ensure the member of staff is mentally fit and well, a medical form is forwarded for completion after the job offer has been made.

As is standard practice a Job Description is provided for all posts and a copy of which is supplied to the applicant. They like all other staff, are provided with the necessary paperwork, information and guidance they need in order to perform their roles effectively and safely.

Volunteer staff are supervised at all times, by a person who is regulated by the company, the supervision will be reasonable in all circumstances to ensure the protection of children. The supervision will be regular and day to day, and all supervision is reasonable in all the circumstances to ensure the protection of children. However, due to the nature of the young people at Libra, the company is highly unlikely to engage volunteer staff. Libra is not able to accommodate children on work experience.

Contractors

LIBRA has its own designated self-employed maintenance staff who work under the direction of the Estates Manager. All of these staff have appropriate DBS checks in place. These members of staff as well as other specialist outside contractors eg for alarm maintenance/fire apparatus testing, are scheduled at the school outside of term time, or after/before school hours (or at

weekends) so are not on school grounds at the same time as children. Work in the residential homes is organised for completion whilst young people are at school.

On rare occasions when external contractors attend either the school or any of the residential homes (for instance to deal with emergency repairs) whilst the young people are there, for child protection and safeguarding purposes, the contractor is required to provide identification, then issued with a visitor's badge coloured accordingly to confirm whether or not the person has a DBS in place, signed in and is accompanied by a suitably trained member of staff during their working time, there would be absolutely no unsupervised contact with the young people. There is also CCTV at the school in most rooms and this is also recorded. Where necessary, LIBRA will obtain a contracting company's safeguarding policies for review and retention.

As good practice, where we have expected infrequent professional visitors eg photocopier engineer we will request details in advance from their employer that they have a suitable DBS check in place, which is less than 3 months old (or are part of the DBS Update Service). We request this information annually to ensure we have it in place in case a breakdown occurs and urgent attendance is required. All visitors and contractors are issued with the Libra Brief in reception which covers a multitude of relevant information and most importantly regarding Safeguarding responsibilities and DSL information and H&S requirements such as fire assembly points.

Unsuccessful Applicants

Applicants who are not shortlisted for interview are sent (at the earliest convenience after the deadline has passed) a 'Not shortlisted for interview' letter.

Applicants who are not successful at either first or second round interviews are sent (at the earliest convenience following the interview) an 'Unsuccessful at interview' letter.

Applicants who are not successful following a Shadowing day are sent an 'Unsuccessful at Shadowing day letter.

Applications from unsuccessful applicants including any interview notes are retained on the appropriate recruitment drive file for 6 months and then destroyed. The Recruitment Log is retained should there be any need to refer to it in future, this has proved particularly beneficial for child protection purposes in the past.

Terms and Conditions of Employment

An example of the post's contract is sent to all those who request an application pack for any vacancies. It is also re-sent at 'Invitation to Interview' stage - both processes are undertaken so that the applicant/candidate can make a more informed decision relating to the post which they are interested in/have applied for.

Two copies of the Contract of Employment is issued to new staff - one for the member of staff to retain and one for return to the Staff file (signed by new staff, co-signed by recruitment team). For child protection/safeguarding purposes it makes reference to the ongoing requirement to be familiar with the company's Safeguarding Policy and Procedures.

Internal Promotions

If the successful candidate is a present member of staff then they will be sent:

- a letter confirming the variation to his or her terms and conditions
- details of the planned induction programme
- the start date
- the name of the designated member of the SMT who will act as a mentor during the probationary period

Induction

All new entrants should attend induction sessions organised by the Company safety adviser to ensure that they receive adequate information on the company arrangements for health and safety, including fire precautions. There are also other areas of training regarding first aid, positive handling and there are separate policies on these areas. Guided Tour of the premises either by the School Manager, administration staff or young people (in the presence of another member of staff). Staff are trained during induction and beyond to follow Libra's Safeguarding procedures and not put the child at risk.

All staff are asked to come into the office before they take up the post to go through administration areas such as holiday system, email system, payroll set up and staff are asked if they have any questions at that stage and these answers are given immediately or they are advised who the appropriate member of staff is to speak with. This gives an opportunity for all queries to be answered and explained so that staff start their jobs feeling more informed of company set up, processes etc.

Care staff feedback through Supervision sessions regarding their progress in the early stages of their employment, these sessions continue throughout their employment.

All other staff meet with their line managers to discuss their feedback during their trial periods often leading to confirmation of a permanent post or to covers any areas in need of attention and in some cases requiring an extension of the probationary period.

The induction process is organised by the Training Manager and training programmes/information where applicable, is supplied during the first few weeks of employment and as and when the need arises thereafter. Details of Libra's safeguarding system and processes are communicated to all staff members as part of their induction this includes the issuing of further copies of the Safeguarding Policy and full Child Protection training as well as general information such as the DfE's guidance on Safe Working Practice via induction training sessions and additionally via the receipted copy of the Read, Received and Responsibilities Form – which includes direction to the responsibility by all staff to read the company's policies and procedures and in particular, those of great importance eg Safeguarding, Complaints, Health & Safety and Whistleblowing.

Teacher Induction Training

Libra is a small school in terms of pupil numbers and staff numbers. The recruitment of teaching staff is usually irregular and recruitment is usually only in terms of one post. Consequently, the school induction is an informal plan organised to suit the individual and the situation in the school at the time but it will involve the following:

- Guided Tour of the premises either by the Head of Education, or delegate, or administration staff or young people – in the presence of another member of staff.
- Introduction to all current teachers either by the Head of Education, or delegate or administration staff.

- Meeting with administration staff to complete all relevant recruitment paperwork and to receive the relevant Safeguarding, Child Protection and Health and Safety training.
- Meeting with administration staff to cover all aspects of the paperwork required by teachers. Teachers receive an electronic new starters folder from the Head of Education containing term dates, primary grid information, examples of education paperwork plus templates of the same, library access, ordering system, parking information and relevant Director's memos.
- Meeting with Head of Education or Line Manager to discuss IEP's, pupil risk assessments and Educational Trips Off Site Risk Assessments.
- Teacher Observations – new teachers are timetabled to sit on other teacher lessons to observe current teaching practice which promotes knowledge of the pupils prior to one to one teaching.
- Safety Intervention training – new staff are booked to attend the first available Safety Intervention De-escalation training course. New teachers are accompanied by support staff until they are able to complete this training.
- First Aid training – if new staff require First Aid they are booked onto the first available course, if the company feels their role requires this – the majority of staff have this. Support staff working with the pupils are all first aid trained as is all of the administration team. Some staff are identified as requiring additional training such as paediatric or outdoor first aid.
- Principal Lesson Observations occur termly and staff are encouraged to observe other teacher lessons and feedback their observations to aid staff development.
- Appraisals are held annually and arranged by the Head of Education.
- Further copies of the Safeguarding Policy and Child Protection training and general information are provided to staff during induction training, via training sessions and additionally via the receipted copy of the Read, Received and Responsibilities Form.

RCCO Training Induction

Due to the size of this information, it is stored on the school server.

Roles, Responsibilities and Accountability

The abuse of children is most easily concealed where there is confusion about roles, responsibilities and accountability. All staff receive a job description for their role carefully detailing a staff member's ongoing responsibility for the protection of children and includes:

- A description of the work they will undertake with children, with reference to any relevant safeguarding guidelines.
- A clear statement that they will abide by Libra's policies and procedures.
- A statement of their duty to protect children from abuse and what action is to be taken if abuse is suspected.
- Their line Manager details.
- The person (s) whose work they will supervise if any.

In addition, LIBRA supply their staff with a Read, Received and Responsibilities form for them to sign, which enables LIBRA to be confident that staff are fully aware and have received all details relating to their roles, responsibilities and accountability. The form covers the following areas:

- a requirement to read Health and Safety information;
- confirmation that they are in receipt of all necessary paperwork including Job Description, Safeguarding Policy, Staff Handbook, Contract etc;

- confirmation that they have received details of line management and staff roles in the company;
- their ongoing commitment to safeguarding and the welfare of young people in their care;
- that they are obliged to familiarise themselves with LIBRA's Policies and Procedures including those highlighted for priority reading eg Behaviour Management, Safeguarding, Data Protection inc Securing of Records Policy / De-Escalation and Positive Handling Policy / First Aid Policy / Health and Safety Policy inc First Aid / Supervision Policy / Staff Training and Development / Lone Working and Vulnerability Policy / Complaints Policy / Whistleblowing Policy. Many policies including legislation such as Keeping Children Safe in Education / Working Together to Safeguarding Children are uploaded to 'Parago' which is the software we use as a platform to display to staff. Here the staff can review the policies carefully and then sign them off to show their understanding and their responsibilities around each document.

Probationary Period

Staff are employed on a trial period which is stated in the offer of employment letter. This is usually 3 months. Towards the end of the trial period the company will liaise with the member of staff to inform them that the trial period is ending and they have completed the period satisfactorily or if not, and need to extend the trial period, a meeting will be held and a letter confirming details of the extension will be despatched.

For child protection and safeguarding purposes, new members of care staff work with an experienced member of the care staff until the end of their probationary period. The progress of all new employees are monitored by a nominated member of staff and review meetings are scheduled as and when required during this period to determine whether the employment should be confirmed, extended or terminated, the Senior Management Team are also kept informed of progress of new staff.

Staff Turnover

On an annual basis the Directors and Principal review the Staff Leavers List to monitor staff turnover and reasons for departure in order to take into consideration any comments that have come to light for improvement or company development purposes. The Directors, Director of Care or School Manager aim to have an exit meeting with staff before they depart in order to obtain feedback, any relevant information is communicated to the relevant Director or Principal. On occasions, these meetings do not occur, for instance where the member of staff uses holiday to cover notice period or is absent due to sickness. The Office Manager retains this list (in the recruitment file) and updates it accordingly in liaison with the School Manager. School staff details are updated on the 'Qualification Summary for Prospective Parents'.

Recruitment checklist

A Taskpad Recruitment Checklist has been put together and this information is uploaded to Onedrive, shared with relevant recruitment staff so that each may enter details relating to the tasks that they are allocated. It allows the admin team to track the exact situation for each new recruit up until their staff file and training/induction requirements are complete. Should they not be employed then the taskpad note is printed and attached to the application pack, and then destroyed after 6 months.

We also have a Staff information sheet for new recruits to sign to confirm that they have read, understood and received all relevant information including health and safety requirements, essential policies and procedures including safeguarding and whistleblowing (this is also indicated in the Staff handbook). This form is then held on their Staff file.

Recruitment Drives – retention of information

In line with Government guidelines and data protection legislation, application paperwork relating to unsuccessful applicants are shredded 6 months after the successful candidate has been in post. We do however retain the Recruitment Log for future reference.

In line with the Data Protection Act all correspondence relating to the appointment – including advert, job description, application form, interview notes and references along with all other items, are held on the individual's Staff file and stored in a lockable cabinet with access restricted to those who need it to undertake duties relating to recruitment and Staff. Libra are members of the Information Commissioner's Office and follow guidelines with regard to all areas of Data Protection, for further information and detail, please refer to our Data Protection Policy and Procedures.

DBS certificates are obtained, copied, relevant details extracted – for the purpose of the Single Central Register/Record and certificates are then shredded after 6 months.

Single Central Record

Libra maintains an up to date single central record which covers all staff who work at the School and the company as a whole. It contains the following details:

Checks	Date (and initials) when checked
▪ Identity check	
▪ Role	
▪ Start date	
▪ Date of Birth	
▪ Address	
▪ Identification seen	
▪ QTS and Induction status	
▪ Prohibition from teaching check inc outcomes/restrictions	
▪ Section 128 check	
▪ Director Disqualification check	
▪ References – satisfactory / signed	
▪ DBS with barred list info	
▪ DBS Update Service inc consent to monitor	
▪ Right to work in the UK check	
▪ Checks on individuals living or working outside the UK (or have done previously)	
▪ Medical Form	
▪ Staff Declaration of Suitability including (but only for those working in residential homes: 'disqualification by association'	
▪ Have read (via Parago) most up to date KCSIE	

Alongside this Record, Libra also hold a 'DBS Update Service Subscription Data' to track the progress of DBS checks and to make 6 monthly checks to ensure no changes have occurred to the content of DBS certificates (authority is in place for such checks to be undertaken). This record also helps to prompt staff to renew their subscription to the DBS Update Service (to avoid it lapsing and having to start a new check).

Raising Awareness of this Policy

We will raise awareness of this policy via:

- the Staff Handbook
- the school website
- on the school noticeboard
- the Parent/Carer Handbook
- communications with those seeking employment and applying for vacant posts

Training

The School Manager oversees the recruitment process completed the NSPCC Safer Recruitment training in January 2021 and attends Babcock workshops and refreshers relating to Safer Recruitment incorporating Safeguarding. Other members of staff (eg panel members and recruitment administrators) also hold the NSPCC qualification 'Safer Recruitment in Education'. These people are responsible for disseminating all recruitment information and guidance appropriately.

All staff:

- have equal chances of training, career development and promotion
- receive training on this policy on induction
- receive periodic training so that they are kept up to date with new information
- receive equal opportunities training on induction

Safeguarding

We are committed to safeguarding and promoting the welfare of all children as the safety and protection of children is of paramount importance to everyone in this school. We work hard to create a culture of vigilance and at all times we will ensure what is best in the interests of all children.

We believe that all children have the right to be safe in our society. We recognise that we have a duty to ensure arrangements are in place for safeguarding and promoting the welfare of children by creating a positive school atmosphere through our teaching and learning, pastoral support and care for both pupils and school personnel, training for school personnel and with working with parents. We teach all our children about safeguarding.

We work hard to ensure that everyone keeps careful watch throughout the school and in everything we do for possible dangers or difficulties. We want all children to feel safe at all times. We want to hear their views of how we can improve all aspects of safeguarding and from the evidence gained we put into place all necessary improvements.

Equality Impact Assessment

Under the Equality Act 2010 we have a duty not to discriminate against people on the basis of their age, disability, gender, gender identity, pregnancy or maternity, race, religion or belief and sexual orientation.

This policy has been equality impact assessed and we believe that it is in line with the Equality Act 2010 as it is fair, it does not prioritise or disadvantage any pupil and it helps to promote equality at this school.

Race Disparity Audit

We acknowledge the findings of the Race Disparity Audit that clearly shows how people of different ethnicities are treated across the public services of health, education, employment and the criminal justice system.

The educational section of the audit that covers: differences by region; attainment and economic disadvantage; exclusions and abuse; and destinations, has a significant importance for the strategic planning of this school.

Monitoring the Effectiveness of the Policy

The practical application of this policy will be reviewed annually or when the need arises by the coordinator, the Principal/Directors.

A statement of the policy's effectiveness and the necessary recommendations for improvement will be presented to the Directors for further discussion and endorsement. (See Policy Evaluation)

Linked Policies

Safeguarding & Child Protection	Safer Recruitment	Contract of Employment
Data Protection	Disclosure and Barring Service Checks	Supervision Policy
Staff Training & Development Policy & Procedures	Risk Assessment Policy	Extremism, Radicalisation inc Prevent Duty
Equality	Data Protection and the General Data Protection Regulation (GDPR)	

Equality Impact Assessment

Please complete an initial equality impact assessment once this policy has been customised to suit your purposes.

Policy Title	The aim(s) of this policy	Existing policy (✓)	New/Proposed Policy (✓)	Updated Policy (✓)
Safer Recruitment	As above			✓

This policy affects or is likely to affect the following members of the school community (✓)	Pupils	School Staff	Parents/carers	Directors	School Volunteers	School Visitors	Wider School Community
	✓	✓	✓	✓	✓	✓	✓

Question	Equality Groups																		Conclusion							
Does or could this policy have a negative impact on any of the following?	Age			Disability			Gender			Gender identity			Pregnancy or maternity			Race			Religion or belief			Sexual orientation			Undertake a full EIA if the answer is 'yes' or 'not sure'	
	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Yes	No
		✓			✓			✓			✓			✓			✓			✓			✓			✓
Does or could this policy help promote equality for any of the following?	Age			Disability			Gender			Gender identity			Pregnancy or maternity			Race			Religion or belief			Sexual orientation			Undertake a full EIA if the answer is 'no' or 'not sure'	
	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Yes	No
	✓			✓			✓			✓			✓			✓			✓			✓			✓	
Does data collected from the equality groups have a positive impact on this policy?	Age			Disability			Gender			Gender identity			Pregnancy or maternity			Race			Religion or belief			Sexual orientation			Undertake a full EIA if the answer is 'no' or 'not sure'	
	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Yes	No
	✓			✓			✓			✓			✓			✓			✓			✓			✓	

Conclusion	We have come to the conclusion that after undertaking an initial equality impact assessment that a full assessment is not required.
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Policy Evaluation

Points to be considered	Yes	No	N/A	Please supply evidence
• Policy annually reviewed	✓			
• Policy in line with current legislation	✓			
• Coordinator in place	✓			
• Director in place	✓			
• Coordinator carries out role effectively	✓			
• Principal, coordinator and Director work closely	✓			
• Policy endorsed by Directors	✓			
• Policy regularly discussed at meetings of the Directors	✓			
• School Staff aware of this policy	✓			
• School Staff comply with this policy	✓			
• Pupils aware of this policy	✓			
• Parents aware of this policy	✓			
• Visitors aware of this policy	✓			
• Local community aware of this policy			✓	
• Funding in place	✓			
• Policy complies with the Equality Act	✓			
• Initial Equality Impact Assessment undertaken	✓			
• Policy referred to the Handbook	✓			
• Policy available from the school office	✓			
• Policy available from the school website	✓			
• School Council involved with policy development	✓			
• All stakeholders take part in questionnaires and surveys			✓	
• All associated training in place	✓			
• All outlined procedures complied with	✓			
• Linked policies in place and up to date	✓			
• Associated policies in place and up to date	✓			
A statement outlining the overall effectiveness of this policy				
This policy is effective and ready for purpose				

References

We believe this policy should be a working document that is fit for purpose, represents the school ethos, enables consistency and quality across the school and is related to the following legislation:

- DfE Keeping Children Safe in Education September 2021
- DfE Disqualification under the Childcare Act 2006, Feb 2015
- Childcare Act 2006
- The Childcare (Disqualification) Regulations 2009
- Education Act 2011
- Education (Independent School Standards) (England) Regs 2014
- Education (Non-Maintained Special Schools) (England) Regs 2015
- Working Together to Safeguard Children 2018
- The Education (Health Standards) (England) Regs 2003
- The Education (Pupil Referral Units) (Application of Enactment) (England) Regs 2007 as amended by SI 2010/1919, SI 2012/1201, SI 2012/1825, SI 2012/3158
- School Staffing (England) Regs 2009 as amended by SI 2012/1749 and SI 2013/1940, 2014 and 2015
- Children Act 1989 and 2004
- The Protection of Children Act List 1999
- School Standards and Framework Act 1998
- Education (Teachers' Qualifications and Health Standards) Regulations 2003
- Education and Inspections Act 2006
- Education (School Teachers) (Qualifications and Specified Work) (Miscellaneous Amendments) (England) Regulations 2012
- Employment Act 2008
- Police Act 1997
- The Police Act 1997 (Criminal Records) Regs 2002, as amended
- The Police Act 1997 (Criminal Records) (No 2) Regs 2009 as amended
- Protection of Freedoms Act 2012
- Equality Act 2010
- Safeguarding Vulnerable Groups Act 2006
- DBS Changes to Disclosure and Barring inc regulated activity 2012
- School Standards and Framework Act 1998
- Children's Homes Quality Standards and Regulations
- The Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975, as amended
- Employment Relations Act 2004
- Data Protection 1998
- Human Rights Act 1998
- Immigration, Asylum and Nationality Act 2006
- Safeguarding Vulnerable Groups Act 2006
- Sex Discrimination (Gender Reassignment) Regulations 1999
- Part-time Workers (Prevention of Less Favourable Treatment) Regulations 2000

- Fixed-Term Employees (Prevention of Less Favourable Treatment) Regulations 2002
- Employment Equality (Age) Regulations 2006
- Work and Families Act 2006

The following documentation is also related to this policy:

- NCTL publication 'Teacher misconduct: the prohibition of teachers'
- Ofsted Guidance
- Teacher Standards 2012
- Equality Act 2010: DfE Advice for Schools
- The Common Law Duty of Care
- Disclosure and Barring Service Code of Practice
- Independent School Standards Regulations 2014
- Forum Newsletters
- Choosing with Care
- The Bichard Inquiry Report
- Conditions of Service for School Teachers in England and Wales (Council for Local Education Authorities)
- School Teachers' Pay and Conditions Document 2016
- Article 12 of the United Nations Convention on the Rights of the Child
- Guidance for safer working practice for those working with children and young people in education settings Oct 2015
- Race Disparity Audit - Summary Findings from the Ethnicity Facts and Figures Website (Cabinet Office)
- Data Protection: a toolkit for schools (DfE)
- Preparing for the General Data Protection Regulation (GDPR) - Information Commissioner's Office.
- Working Together to Safeguard Children: A Guide to Inter-agency Working to Safeguard and Promote the Welfare of Children (2018)
- <https://www.gov.uk/guidance/recruit-teachers-from-overseas>