

Recruitment, Selection and Vetting Policy and Procedures

In keeping with our absolute responsibilities to the public, as well as our statutory legal obligations, the Operam Education Group (OEG) and all its subsidiary companies (Provide Education, The Education Specialists, Teachers UK, Key Stage Teacher Supply, First for Education and Bridge Education) thoroughly vet all its candidates by running background, character, medical, criminal, and professional checks. Such checks are made before an initial appointment and repeated during service. Any circumvention of our strict procedures is taken seriously and may result in instant dismissal of all parties concerned. Acknowledging our responsibility to safer recruitment, Operam Education Group is fully committed to regular in-house training of all team members on safer recruitment practices.

Operam Education Group has a policy to err, if ever, on the side of caution. We take our responsibilities very seriously, as must all employees in our business. If there is any question about a candidate's suitability, then our response is not to register them.

In addition, we are committed to compliance with the UK General Data Protection Regulation (UK GDPR) and Data Protection Act 2018. Candidate personal data will only be collected and processed where it is necessary for legal, safeguarding, or contractual purposes. All data will be stored securely on our CRM system, retained only for as long as necessary for these purposes, and securely deleted or anonymised thereafter.

This policy reflects the current version of Keeping Children Safe in Education (KCSIE), will be formally reviewed at least annually, or whenever statutory guidance changes, guidance, or APSCO Compliance+ standards.

Expansion of The Operam Education Policy on Safer Recruitment Practices:

All our recruitment procedures fully comply with Keeping Children Safe in Education, the Employment Agencies Act 1973, The Conduct of Employment Agency and Employment Business Regulations 2003, Disqualification under the Childcare Act 2006, Rehabilitation of Offenders Act 1974.

Our pre-employment checks are rigorous, exceeding the minimum legal requirements where necessary in order to meet best practice standards. Candidates are not available for placement until all necessary pre-employment checks have been completed. Operam Education Group are committed to offering our candidates those placements that match the requirements of our clients. All candidates are treated equally, regardless of age, disability, gender, nationality, race, religion, and sexual orientation, recruitment decisions are based upon suitability for the role and safer recruitment considerations.

Operam Education Group has its own CRM system with a screening facility. The online application form, is completed through the Access screening facility. It allows for us to record expiry dates of relevant documents and information, which in turn triggers an action for our internal compliance team to do an updated check.

Our CRM System creates a document that is issued to the client advising them of all the pre-employment compliant checks that have been completed, including expiry dates, prior to the first day of the candidate's assignment.

Best recruitment practice is fulfilled through open and transparent communication with our clients about our candidates. If our clients choose to engage with a candidate prior to all completed checks then a disclaimer is required. The client will be notified as soon as the relevant check is obtained.

How the Operam Education Group Policy on Safer Recruitment is implemented:

Pre- employment checks are completed prior to the candidate's first placement and are repeated during their time with us. The following checks apply to all candidates:

- Face to face/video interview
- Full employment history
- Gaps in employment of 12 weeks or more
- Proof of Identity
- Proof of address
- Proof of National Insurance Number
- Eligibility to work in the UK
- Enhanced DBS
- Update service check
- Overseas police check (where applicable)
- Verification of Qualifications
- Teaching Regulation Agency check (TRA)
- Minimum two professional references
- Medical/fitness to teach declaration
- Rehabilitation of Offender's Declaration
- Induction check on Teachers who qualified since 1999
- Online search completed in accordance with Keeping Children Safe in Education (KCSIE)

To support our rigorous vetting process, the compliance team check through the Access Screening application and interview process that all candidate questions and all documents related to the required checks have been answered. Any unanswered questions will be discussed with the candidate, all clarifications or additional evidence obtained will be recorded on the CRM for audit purposes.

Candidate Registration

A full registration by means of an online application form, through Access Screening, will be undertaken for all new candidates prior to being placed into an assignment. This will include the candidates consent to the type of work they are willing to undertake.

If there is a break of more than 12 weeks since the candidates last assignment, we will ensure that all details from the previous registration remain valid and any relevant gaps evidenced.

Employment History

Through our online application, all candidates are required to provide their full employment history or back to compulsory full time education, whichever is more recent. Any gaps in employment of 12

weeks or more will be discussed at interview and evidence obtained, which will be stored securely in line with GDPR requirements.

Interviews

All candidates undertake a face-to-face or video registration interview prior to placement.

Candidates must present original documentation for verification and answer standard competency-based questions that enables the Consultant to determine their knowledge and to assess the candidate's experience against the information on the pre-screening work history field.

Any gaps in employment are discussed at the interview and evidence will be sought as for the reasons, such as an additional reference.

The interview is recorded in detail and follows a consistent format thus allowing the business to justify any recruitment decision made. The interview is evidenced by signed and dated interview notes by the consultant and candidate, or a candidate email approval. This is stored electronically on our CRM, with access to authorised staff only.

Rehabilitation of Offenders Declaration

In line with the guidance on the Rehabilitation of Offenders Act 1974, all candidates will be required to complete, sign and date a "Rehabilitation of Offenders" declaration prior to their first placement.

Operam Education Group uses the following *'do you have any convictions, or any pending convictions, reprimands or final warnings, which would not be filtered in line with current guidance?'*

Employees involved in the recruitment process are trained in the legal requirements of the declaration, including understanding the DBS filtering rules as set out in the current DBS filtering guidance, it is the initial responsibility of the Manager to speak to the candidate who may have answered 'yes' to any of the questions. At that point written details related to the declaration will be taken and depending on the outcome a decision will be made as to continue with the registration.

Depending on the severity of the outcome, our internal procedure would be to escalate to the Designated Safeguarding Lead.

Proof of Identity

Operam Education Group will obtain photographic evidence of the candidate's identification, checking the birth certificate if available.

We will obtain copies of all original documents, which in turn will be validated, signed and dated by the recruitment business. They are held electronically on our CRM system.

Our compliance team are trained through the Disclosure & Barring Service's 3 route ID checking process.

Checks are carried out through our digital identity document validation technology (IDVT), ensuring compliance with all Home Office requirements.

Proof of Address

Operam Education Group will obtain two original documents as proof of address, from the Disclosure and Barring Service's Trusted Government Document lists 2a and 2b. which are verified, dated and signed by the trained member of staff.

Where two original documents are not possible then one original document from the Disclosure and Barring Service's Trusted Government Document lists 2a or 2b will be accepted, provided that, it is not the same document that has already been relied upon for proof of identity.

If in doubt, guidance is sought via the government guidelines.

Eligibility to work in the UK

Operam Education Group utilise a certified Identity Service Provider (IDSP) to complete digital identity checks on candidates prior to registration (where applicable i.e. in-date UK or Irish passport holders).

All staff:

- Verify the candidate through a video call or in person.
- Have training and guidance on the information they must obtain from the IDSP to confirm verification and the information required to establish eligibility to work in the UK.
- Understand the legal requirements of checking documentation.

The guidance utilised: <https://www.gov.uk/government/publications/right-to-work-checks-employers-guide>

For candidates who do not hold an in-date UK or Irish passport, a face to face interview is held and all documents are checked and recorded on the CRM, with copies stored securely and in line with data protection legislation.

Non-British nationals who hold a Biometric Residence Permit (BRP), a Biometric Residence Card (BRC) or have been granted Pre-Settled/ Settled status under the EU Settlement Scheme use the Home Office online service for checking immigration status.

Candidates will be requested to provide their Sharecode and the government website will be checked: <https://www.gov.uk/view-right-to-work>

The Employer Checking Service will be utilised for any candidates outside of the scope above.

<https://www.gov.uk/viewprove-immigrationstatus>

The recruitment business will ensure that staff members checking documentation understand the legal requirements and refresher training will be undertaken at least annually to ensure compliance with the latest Home Office guidance.

Proof of National Insurance

Candidate's national insurance number will be obtained and verified through the online application. The documents accepted are: National Insurance Card OR P45/P60 OR Letter from HMRC or benefits agency OR Pay slip from the candidates last employer.

All verification evidence will be stored securely on the CRM in compliance with UK GDPR, and will only be accessed by authorised staff.

Qualifications

For all candidates being considered to join our register, whichever role that may be, it is essential to see sight of their original qualification(s) that are legally required to do the job.

All qualifications are:

- Recorded, signed, dated and stored electronically.
- Checked against the Teaching Regulations Agency (TRA) which is applicable to Teaching candidates only. Our CRM is designed to prompt the compliance team to carry out a TRA check every 12 months, to ensure the teaching candidate is still suitable to teach.
- Verified by an original UK ENIC check for overseas candidates outside EEA, Switzerland, Australia.

In the event of a candidate not being able to obtain an original certificate, we encourage the candidate to obtain relevant information from the university, college or training provider to at least confirm they attended the course and gained a qualification.

Best practice is to advise our client of the status of the qualification check.

We are fully compliant with Regulation 22 of the Conduct Regulations 2003 and advise our client via e-mail of the qualifications that the candidate has obtained. This is displayed on the confirmation of checks that is sent to the client at each new assignment.

Where qualifications are obtained electronically from awarding bodies, verification of authenticity will be documented, and the date, method, and staff member verifying will be recorded on the CRM.

Overseas Trained Teachers (Outside EEA, Switzerland, Australia, Canada, New Zealand and US)

A candidate will be requested to provide an original UK ENIC check to establish their qualifications are equivalent to the UK. We will verify, document and sign and date the check.

Where the candidate is placed as a qualified teacher we will check and record the candidate's status in reference to the four-year rule and this is recorded on the CRM as such.

We will also obtain and record a letter of professional standing from the relevant regulatory authority in their home country where possible, in line with DfE guidance.

Overseas Trained Teachers (From EEA, Switzerland, Australia, Canada, New Zealand and US)

A candidate will be requested to provide evidence that they have applied to the TRA for the award of QTS. This will be verified, documented signed and date the check.

The business will not place a candidate in qualified teacher roles until the QTS award is confirmed and evidence has to be verified, documented, signed and dated. The confirmation of the QTS must be received within 12 weeks of their application.

Induction

For teachers who have qualified since 1999, Operam Education Group will gain evidence from the candidate that the induction period has been satisfactorily completed.

We ascertain the status of the teacher's induction when completing the Teaching Regulations Agency (TRA) check.

There is the facility on our CRM system to record the status and the expiry date as to when the candidate becomes out of the rules of working on supply. The client will see sight of this on the pre-employment check documents.

Regular communication with the candidate takes place during their time with the business regarding their induction and it is the role of their consultant to support the candidate in finding a suitable placement to complete it. This is carried out by marketing the candidate out to our clients throughout the business.

Where an induction period is still in progress, or the teacher is close to reaching the supply limit, the CRM will flag this automatically, and consultants will ensure clients are informed in writing to avoid any breach of statutory requirements.

Teaching Regulation Agency (TRA) check

For all qualified teachers, a online Teaching Regulation Agency (TRA) check is carried out prior to assignment for candidates to ensure that the candidate has a valid Qualified Teacher Status qualification, no active restrictions and/or prohibitions against them and their induction status. The check is recorded on the Screening Portal/CRM and the date that the check was completed. This check is carried out every 12 months to ensure the candidate has continued suitability to work in schools.

Any changes to a candidate's TRA record, such as new restrictions, are escalated immediately to the Designated Safeguarding Lead and the client is informed without delay.

Disqualification under the Childcare Disqualification Regulations 2018 and Childcare Act 2006

Operam Education Group provide candidates to the early years setting (aged 5 and under) and wraparound care (up to the age of 8), therefore we are responsible for obtaining information as to whether our candidate is disqualified under the regulation and prohibited to work in the settings.

This information is ascertained through our 'Access screening' tool, evidenced by a signed self-declaration. The compliance team ensure close scrutiny of the declaration at the authorisation screen and would advise the Manager immediately if there was anything declared.

Where a positive declaration is received, the matter will be escalated to the Designated Safeguarding Lead immediately, and a documented risk assessment will be completed in line with DfE guidance before any placement is considered.

Section 128 Direction Check

For any candidates applying for a management and governance roles within schools will ensure that a Section 128 check will be completed.

An online TRA check will be sought and recorded on the screening/CRM and re-checked before placement into a management role.

Disclosure and Barring Checks

All candidates registered are required to either undergo an Enhanced DBS Disclosure with a children's barred list check for all candidates prior to placement (as applicable for the role the candidate is applying for), or if they have a current Enhanced DBS with another organisation that is registered with the Update Service, the Enhanced DBS will be accepted, and an Update Service check carried out every 12 months (as a minimum). Candidates are required to undergo a DBS check every 12 months if they choose not to register with the Update Service. The check will be recorded either in hard or soft copy.

Where a candidate provides a DBS from a third party that is not on the update service, a new Enhanced DBS check will be applied for and we would inform the client prior to placement that this is the case. We will verify the new DBS as soon as possible and update the school with latest information.

Where a candidate has a gap of more than 12 weeks since their last work we will complete a DBS update service check and record the new check on the CRM.

As a last resort, if the DBS check is in process and all other checks are complete, a client's consent to place the candidate would be obtained and recorded. We will verify the new DBS as soon as possible and update the school with latest information.

DBS Update Service

Where candidates have an Enhanced DBS, the Update Service allows for portability of a certificate across employers. To access this service for a candidate, we will obtain consent, and check the Enhanced DBS certificate matches the candidate's identity and ensure that it is for the appropriate workforce. Update Service status checks are carried out prior to placement on candidates who already have a current Enhanced DBS and are registered with the Update Service. Ongoing checks are carried out not less than once every 12 months from the last check and the candidates are made aware of the frequency of the checks at registration.

Overseas Candidate Police Checks

All candidates follow the same Recruitment, Selection and Vetting procedures as all other candidates with the addition of:

- A 'clear' valid overseas police check is required, if they have been overseas the last 5 years for a period of 6 months or more while aged 18 and over. This will be verified, signed and dated by the consultant. We refer to the government guidance for criminal record checks for overseas candidates.
- Our check on overseas teachers will require proof of their past conduct as a teacher. This should be a letter of professional standing issued by the professional regulating authority in the country in which they worked.

If we cannot obtain an overseas police check, then we will accept a full professional reference with detailed safeguarding questions answered and advise the client of this.

Where any overseas police check or letter of professional standing contains adverse information, the case will be escalated to the Designated Safeguarding Lead and the outcome of the assessment will be documented prior to any placement.

References

All candidates will be required to provide a minimum of two written professional references covering at least two years' worth of assignments, or longer if required to cover relevant gaps in employment history. For clarity this means obtaining references for a total of 24 months of work and does not include references covering gaps between assignments.

Operam Education Group endeavour to obtain the reference from the referee with sufficient seniority in the educational setting, in the first instance the Headteacher. Where a reference has not been completed by a senior member of staff, references would be countersigned by them OR a declaration on the reference agreed.

If the candidate is a teacher and/ or Teaching Assistant and their recent assignment does not include working with children, we shall obtain additional references from the relevant employer(s) from the last time the candidate worked with children as well as most recent references covering the 24 months rule.

If the candidate is deemed suitable to be on our supply register and has not had any experience working with children further references, if possible, will be sought from relevant organisations in the candidates employment history.

Candidates are required to supply a reference from their most recent employer and a school-based reference (for a minimum of two years previous employment history). Where a teacher is newly qualified, references will be requested from the university and their teaching placement schools. If a candidate for a teaching post is not currently working as a teacher, we will check with the school, college, or local authority at which they were most recently employed to confirm dates of their employment and their reasons for leaving.

Where a candidate has had a break from our services for more than 12 weeks and worked elsewhere they shall be required to provide further reference details before going back out to work.

References obtained from another agency are usually in a standard format and these would include at least dates of employment and confirmation of any safeguarding issues.

We will independently verify references to ensure that they are genuine, and the content is satisfactory. We will contact the referee via an official email address to confirm that the reference is genuine and current.

To 'whom it may concern' or open reference are not acceptable, Such references would only be accepted in exceptional circumstances, such as the school the candidate is going too, is happy to accept it. An e-mail of confirmation would be required.

Copies of references are available to clients on request as required by the Conduct Regulations 2003.

Reference requests from all employers require not only information about the candidate's performance and conduct, their suitability to work with children but also whether they have been subject to any safeguarding issues, disciplinary procedures, or allegations raised, particularly relating to children or adults at risk.

Our responsibility to maintain confidentiality is invariably outweighed by our respect of the public interest. Operam Education Group considers public interest to be intrinsic to our commercial integrity and any safeguarding concerns raised about a candidate is therefore promptly actioned and reported to the appropriate persons if necessary.

Honesty is key to our relationship with our client and giving an overview of the candidate's references to the client is considered best practice throughout our business.

Medical Fitness to work

As required by the Education Health Standards (England) 2003 Regulations, Operam Education Group's Access Screening application requires a declaration to be completed to determine the candidate's physical and health capacity to work.

Any issues relating to the candidate's fitness will be investigated via their Consultant in the business. It is our duty of care that all candidates are deemed fit to work in our clients and that their safety is taken into consideration.

Operam Education Group will follow the guidance from section 7 of the Education (Health Standards) Regulations.

Where adjustments are required under the Equality Act 2010 to enable the candidate to carry out their duties, these will be discussed confidentially with the candidate and, where necessary, the client, with the candidate's consent.

If a candidate declines to complete a health declaration, or provides insufficient information to assess their medical fitness, the company will record the refusal and may be unable to proceed with placement.

Online Searches

In accordance with the current version of *Keeping Children Safe in Education (KCSIE)*, Operam Education Group carries out an online search as part of its safer recruitment and due diligence process for candidates who are being considered for work in schools and other educational settings.

The purpose of the online search is to identify any publicly available information that may be relevant to the candidate's suitability to work with children, including any incidents or issues that may need to be explored further with the candidate before a placement decision is made.

Online searches are conducted in a fair, proportionate and consistent manner using publicly available information only. Information obtained through the search will be considered alongside all other pre-employment checks and will not be used in isolation to make recruitment decisions.

Where information is identified that may impact a candidate's suitability for work with children, the candidate will be given the opportunity to discuss or clarify the information before any decision is made. Where appropriate, the matter will be referred to the Designated Safeguarding Lead (DSL) and a documented risk assessment will be completed.

The date the online search was completed, the name of the staff member undertaking the search, and the outcome of the search will be recorded on the candidate's electronic record within the CRM system. Information obtained through the online search will be processed and retained in accordance with UK GDPR, the Data Protection Act 2018.

Safeguarding Training

Operam Education Group requires all candidates to complete safeguarding training prior to placement, in accordance with Keeping Children Safe in Education (KCSIE) and APSCo Compliance+ standards.

As a minimum Level 1 Safeguarding Training will be required, the safeguarding training that has been completed must have the mandatory requirement to report FGM and Prevent. Evidence of refresher training every 12 months will be sought and recorded on the CRM.

Training certificates will be stored securely on the candidate's file, with the completion date, expiry date, recorded for audit purposes.

All consultants undertaking recruitment receive Safer Recruitment training prior to undertaking recruitment activity and undertake refresher training every two years (or sooner where legislation changes).