



RECRUITMENT POLICY

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VERSION CONTROL SHEET

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| V1 | HR Manager | May 2018 | n/a | Principal | Month Year |
| V2 | Head of HR | September 2022 | Provides a clearer summary of the EFI GROUP's safeguarding requirements, including changes to KCSIE 2022. | Principal | September 2022 |
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1. POLICY STATEMENT

The EFI Group recognises that the safeguarding and wellbeing of our students is of paramount importance and expects all staff, contractors, volunteers and work experience/trainees to share this commitment.

The EFI Group is also committed to ensuring that the recruitment and selection of all who work within the EFI Group is conducted in a manner that is fair, efficient, effective, and promotes equality of opportunity.

This Recruitment Policy aims to ensure we facilitate applications from all communities and make selection decisions based on merit and non-discriminatory selection criteria. The EFI Group recognises that in order to achieve these aims, it is of fundamental importance to attract, recruit and retain staff of the highest calibre who share this commitment.

2. SCOPE

This policy provides a good practice framework to comply with the principles set down in the Group's Equal Opportunities Policy and Safeguarding Policy. The practices described in this document are designed to ensure a fair, objective, and safe recruitment process. The responsibility for implementing the policy lies with Human Resources, and each manager involved in the recruitment process. Managers must ensure that recruitment and selection procedures and decisions comply with practices outlined in this policy.

3. THE LAW

The EFI Group aims to provide the best experience for our students and staff and this policy is designed to assist all those responsible for recruiting to achieve this aim, whilst considering the:

- Equality Act 2010
- EFI Groups' Equal Opportunities Policy
- EFI Groups Safeguarding Policy
- General Data Protection Regulation 2016
- Data Protection Act 2018
- Asylum and Nationality Act 2006
- Human Rights Act 1998
- Rehabilitation of Offenders Act 1974
- Requirements for compliance with all relevant legislation, recommendations, and guidance including the statutory guidance published by the Department for Education (DfE), Keeping Children Safe in Education 2026 (and any

subsequent versions), and the code of practice published by the Disclosure and Barring Service (DBS).

4. ROLES & RESPONSIBILITIES

4.1 Recruiting managers

Recruiting Managers are responsible for managing recruitment for roles within the EFI Group in line with this policy. Their responsibilities include:

Assessing and Planning Recruitment for a Role

- Assess and review the need for a role, in a timely manner; whether it is a new role to the EFI Group, or a replacement role when an existing employee resigns.
- Review the existing job description and person specification for the role to ensure it is up to date and accurate.
- Complete a Request to Recruit form and gain the appropriate authorisation to recruit to a post promptly.
- Consider all recruiting methods, including checking potential internal candidates, to ensure the most effective recruitment campaign possible.

Complete an Interview Process Form outlining the closing date, shortlisting date, interview date, interview panel, and confirm the interview questions and interview tasks/assessments.

Shortlisting & Reviewing Applications

- The job will be posted via Access ATS, and Recruiting Managers will be added as a Hiring Manager for the vacancy when the vacancy closes.
- Review applications and score candidates via Access ATS after the role closes.
- Panel members must complete and upload their own shortlisting scorecard to the candidate's application in Access ATS.
- If preferred, shortlisting can be done in Excel first using a shortlisting grid; scorecards must still be uploaded to ATS.
- Shortlisting should be completed within 2 days of the role closing.
- A minimum of two panel members must shortlist independently, then compare scores to agree final candidates.
- Shortlisting decisions must be based on the specific skills and experience required.
- A shortlisting grid is recommended and available to populate with specific criteria following the closing date.
- Interviews cannot progress until all shortlisting scorecards are completed and uploaded for all applicants.
- Once shortlisting is complete, the Lead Hiring Manager should move candidates to the appropriate stage in the ATS (i.e. shortlisted or rejected).

Assessment

- All assessment processes should be robust, fair, and may include competency interviews and tasks.

Offers, Outcomes & Feedback

- Promptly communicate outcomes to HR for both successful and unsuccessful candidates, including feedback and interview notes.
- In collaboration with HR, make offers to successful applicants in line with the approved vacancy.
- It is recommended that the Lead Hiring Manager or Line Manager calls the successful candidate to verbally offer the role and discuss a suitable start date, helping establish a positive working relationship.
- Recruitment will provide an offer letter with full terms & conditions to support this call and will formally issue the written offer after the call.
- Feedback must be provided for all interviewed candidates (via ATS or interview notes).
- Verbal feedback or a feedback meeting should be arranged for internal candidates who are unsuccessful to support development, engagement, and future opportunities.

Interview Process, Note-Taking & Assessment

- Minimum of two panel members per interview.
- At least one panel member must be Safer Recruitment trained; contact Recruitment if training is required.
- Each panel member must take separate notes for each candidate, including, Factual answers to questions, scoring out of 5 (1 = poor, 5 = excellent), all safeguarding questions must be asked and recorded.
- After interviews, upload notes to the Files section of the candidate's ATS record.
- HR will collect and check candidates' documents on interview day and escort candidates throughout the building.

Compliance & Policy Adherence

- Strictly adhere to all safer recruitment requirements, challenging colleagues or seeking guidance from HR as needed.
- Follow all other aspects of the Recruitment Policy.
- Please ensure candidates are not left on their own at any time and are escorted around the building at all times, including to the toilet.

4.2 Human Resources

- The end-to-end administration process for recruitment and selection including the placing of adverts, the coordination of interviews/assessments, pre-appointment safeguarding and right to work checks, communicating outcomes

of unsuccessful application/ interviews, collaborating with recruiting managers to make offers and negotiate terms.

- Organising appropriate training for staff undertaking recruitment and selection, especially in relation to safer recruitment and equality of opportunity and ensuring at least one member of every interview panel has completed safer recruitment training.
- Provide recruiting managers with best practice advice in relation to recruitment and selection, including safer recruitment practices, shortlisting, interviewing, and decision-making.
- Ensuring that only applicants with confirmed right to work in the UK are appointed to posts and that appointees and the EFI Group meet all immigration requirements as specified by UK Visas & Immigration.
- Ensuring a safer recruitment process is followed and that no appointee commences a role without the listed checks with the exception of a DBS which would require a risk assessment being completed. See Section 6.12.
- Ensuring all recruitment and selection activity complies with statutory guidance and legislation, including Keeping Children Safe in Education, the Equality Act 2010, data protection and GDPR requirements, employment law and the EFI Group's Recruitment Policy.
- Maintaining accurate and confidential recruitment records, including shortlisting decisions, interview notes, and pre-employment checks, in line with data retention requirements.
- Ensuring that all required pre-employment checks are recorded on the Single Central Record in line with statutory requirements.
- Managing relationships with recruitment agencies and ensuring third-party providers comply with the EFI Group's safer recruitment requirements.

5. RECRUITMENT PROCEDURES

5.1 Request to Recruit

In the first stage of recruitment, recruiting managers are required to fully evaluate the need for new, changed, or replacement posts prior to seeking authorisation for the position. Managers should consider if the duties of the post can be eliminated or reallocated to existing post-holders, taking workloads into account.

Where a new or replacement role is identified, the recruiting manager is responsible for promptly and thoroughly completing a Request to Recruit form which must be authorised by the Director of Department before approval by the Head of Human Resources, CFO and Principal. All vacancies will only be recruited to once this authorisation has been given. In exceptional circumstances, authority will be given by Human Resources to advertise without the fully completed Request to Recruit form but in this case, no appointments can be made without authority from the principal.

Managers should be aware that where little time is given between approval of a Request to Recruit and the preferred start date, these timeframes will not always be achievable.

Requests to Recruit must be submitted via the EFI Group's SharePoint Request to Recruit form.

Before submitting a Request to Recruit form, recruiting managers must ensure that:

- All required approvals have been obtained in principle.
- All sections of the form are fully completed and accurate.
- Human Resources has been consulted for guidance, particularly in relation to the appropriate salary, job band, and job description.
- The relevant pay scale and job band documentation has been reviewed.
- The job description has been reviewed, updated where necessary, and uploaded to the form for review and approval.
- Appropriate budget codes are provided, and funding is confirmed as available within the approved budget.

Incomplete or inaccurate forms may result in delays to the recruitment process.

Recruiting managers requiring advice or clarification should contact Human Resources via Recruitment@efigroup.ac.uk.

5.2 Job Description

Before embarking on the process of recruitment, the recruiting manager must ensure that there is an up-to-date job description for the post. Human Resources will provide a job description template and the most recent job description or comparable job descriptions to support the recruiting manager in drafting or updating the role.

The job description must clearly and accurately set out the following:

- Job title
- Grade or level of the post
- Line management responsibility (to whom the postholder is accountable)
- Confirmation of salary grade
- Confirmation of working hours and contract type
- Key relationships
- Overview of the role
- Key accountabilities
- Main duties and responsibilities
- The safeguarding requirements i.e., to what extent the role involves contact with children and vulnerable adults

The language used in job descriptions must:

- Avoid jargon and unexplained acronyms or abbreviations.
- Be clear and understandable to potential applicants, both internal and external.
- Avoid ambiguity about responsibilities and clearly define the postholder's accountability for resources, staff, and budgets where applicable.
- Use inclusive and non-discriminatory language. Advice on appropriate wording may be obtained from Human Resources.

5.3 Personal Specification

A person specification must be developed alongside the job description and form the basis for shortlisting and selection. It should clearly set out the essential skills, knowledge, experience, abilities, and expertise required for the role. All criteria must be relevant, objective, non-discriminatory, and assessed consistently throughout the recruitment process. Together with the job description, the person specification informs the content of the job advertisement. Human Resources can provide guidance where required.

The specification must be specific to the role, directly related to the job requirements, and not unnecessarily restrictive. Only qualifications, experience, or skills essential to the role should be included. Unjustifiable criteria may be discriminatory if they disproportionately disadvantage particular groups.

Essential criteria are those without which the role cannot be performed effectively. Desirable criteria are those that may enable the candidate to perform better or reduce the induction period. It is recommended that no more than ten essential criteria are specified.

Required abilities should be expressed in terms of the standards expected, rather than the task alone. For example, instead of “ability to write reports,” state “ability to produce detailed financial reports, including departmental budgets, annual variances, and forecasts.”

Care must be taken when specifying physical requirements. Under the Equality Act 2010, reasonable adjustments must be made to ensure the role is accessible to people with disabilities. Physical requirements should be described in terms of the job’s needs. For example, the role may require the postholder to travel to multiple Academy locations.

Where experience is required, it should be expressed in terms of the skills, knowledge, or competencies needed to perform the role effectively, rather than a fixed number of years, unless a specific period can be objectively justified. For example, instead of stating ‘8 years’ experience in finance management,’ state ‘proven experience managing departmental finances to a high standard, including budgeting, monitoring, and reporting.’

Any role requiring specific physical characteristics, a particular gender, or other potentially exclusionary criteria must be discussed with Human Resources before advertising. Human Resources can provide guidance on drafting or reviewing person specifications.

5.4 Advertising the Vacancy

Vacancies will be advertised internally and externally via the PeopleHR Access ATS Recruitment System, across EFI Group websites (i.e. FRA, LCBT, EFI Awards websites) and on external job boards such as Guardian Jobs, LinkedIn, TES, and other appropriate channels to attract a diverse pool of applicants.

Vacancies will normally be posted internally and externally unless the role is designated as internal only.

All candidates, including internal applicants and EFI Group students, are required to complete the online application form via the vacancy link. In line with safer recruitment requirements, CVs alone cannot be accepted. This ensures a consistent, fair, and compliant recruitment process.

Vacancy Setup and Hiring Leads

- HR will set up all vacancies on the ATS. Recruiting managers should not edit the vacancy setup directly; any changes should be requested through the Recruitment Team.
- For each vacancy, HR will assign two or more Hiring Leads, who will form the shortlisting and interview panel. A minimum of two Hiring Leads is required per vacancy.
- Access to the ATS system is only granted to Hiring Leads for live vacancies. Once a vacancy is closed, the ATS tab will no longer appear in the user menu.

Vacancies, applications and offers will be managed entirely through the PeopleHR Access ATS.

Exceptions

- Exceptions to the standard advertising approach must be approved by the Head of Human Resources and may include:
 - Roles ringfenced to a specific team or existing post within EFI Group.
 - The need to recruit external expertise.
 - Internal-only advertisements where a suitable applicant pool exists.
 - The use of external recruitment agencies also requires approval from the Head of Human Resources. Recruiting managers must not contact agencies directly and should seek HR support to identify the most suitable and cost-effective agency.

Equality and Diversity

In line with the Equality and Human Rights Commission guidance, “word-of-mouth” recruitment is likely to be indirectly discriminatory. All vacancies must therefore be advertised widely, including in media reaching underrepresented groups, to ensure all applicants have equal access to information and opportunity.

The Human Resources team is responsible for placing all adverts and ensuring they include all relevant information about the role, responsibilities, and application process.

5.5 Processing Applications and Shortlisting

Candidate Enquiries

- The Recruitment Team and Hiring Leads are responsible for responding to enquiries from potential applicants.
- Managers must ensure that no information or communication implies a preference for candidates of a particular sex, race, or other protected characteristic, as this may constitute unlawful discrimination.
- Care should also be taken when contacting applicants (internal or external) to ensure equal treatment, including invitations to visit the department, informal discussions, or provision of information.

Applications

- Application forms are required from all candidates to ensure safer recruitment processes.
- All candidates must complete the online application form via the vacancy link. CVs alone cannot be accepted. Applicants who submit a CV will be contacted by HR and asked to complete and upload the application form to be considered.
- Applications from candidates with a disability will not be excluded unless they are unable to perform an intrinsic duty of the role, taking reasonable adjustments into account. Adjustments to the recruitment process will be made where necessary to ensure no applicant is disadvantaged due to a disability.
- Candidate applications are viewable in Access ATS (these cannot be downloaded at present).

Shortlisting Process

- The selection panel is responsible for assessing candidates against the job description and person specification.
- HR will review applications for eligibility, including the right to work in the UK, but shortlisting decisions sit with the panel.
- Panels should avoid dismissing over-qualified candidates based on assumptions, as motivation can be explored at interview.
- Shortlisting must involve the recruiting manager and at least one additional panel member.
- Applications should be reviewed within two days of the closing date to ensure a timely process.

Best Practice

- Populate a shortlisting grid with skills and experience criteria.
- Once the vacancy closes, candidates are scored against these criteria.
- Panel members review and agree the final shortlist within the recruitment system.

Managing Applicants in Access ATS

Hiring Leads can manage applicants for assigned vacancies, including:

- Adding a scorecard via the scoring matrix to assess candidates against criteria and provide an overall score and recommendation.
- Progressing candidates through the recruitment pipeline (e.g., Shortlist, Reject).
- Each panel member must complete and upload their own shortlisting scorecard in Access ATS.
- Excel shortlisting grids from the interview pack may be used initially, but final scorecards must be uploaded to ATS.
- Interviews cannot proceed until all shortlisting scorecards are completed and uploaded.
- Once shortlisting is complete, the Lead Hiring Manager moves candidates to the appropriate stage in the ATS (shortlisted or rejected).

Panel Requirements

- Minimum of two people on the interview panel.
- At least one panel member must be Safer Recruitment trained. Contact Recruitment if training is required.

Record Keeping

All original applications, together with notes of reasons for shortlisting or rejection, must be retained for six months from the date the appointment decision is notified.

5.6 Selecting the Interview Panel

All formal interviews must be conducted by a panel consisting of at least two members of staff, one of which must be Safer Recruitment trained. Panels will usually consist of the immediate line manager of the vacant post and a colleague who is familiar with the area of work. Human Resources may also be present if practical. If the recruiting manager wishes for a Human Resources representative to be present, they should provide as much notice as possible to increase the chances of availability.

The recruiting panel should remain the same for each interview to ensure continuity and fairness. This should be the same within stages but with an increase in seniority for the second interview panel. E.g., recruiting manager and member of the team for stage one, recruiting manager and member of SMT or SLT for the second stage.

It is critical that recruiting managers declare to Human Resources if they know an external applicant, or if they have a close relationship e.g. friends outside of work, with an internal applicant. Human Resources will then advise how any potential conflict of interest can be mitigated.

At least one interview must be conducted in person. Informal or online interviews must still be conducted with a minimum of two panel members.

5.7 Planning, Scheduling and Conducting the Interview

Interview Process Form

- The recruitment process begins with the Hiring Lead completing an Interview Process Form, which captures all advert and interview details to ensure the process runs smoothly.
- HR will use the form to plan interviews, book rooms and equipment, and coordinate all logistics.
- Recruiting managers are required to upload interview questions, interview tasks, confirm the panel, dates, times, and overall interview process.

Scheduling Interviews

- Interviews should be scheduled as soon as reasonably possible after the closing date to avoid losing candidates.
- HR will contact all candidates with the same interview details via email.

HR Responsibilities:

- Arrange interviews and candidate communications
- Collect candidates from reception and verify their documents on the day
- Escort candidates to the interview room

Panel Responsibilities:

- The purpose of the interview is to select the best candidate while providing a two-way opportunity for the candidate to learn about the role.

It is the responsibility of both the panel and HR to ensure candidates are accompanied at all times, including when using facilities such as the toilet.

Preparing Interview Questions

- Recruiting managers are responsible for preparing interview questions aligned with the person specification.
- HR will provide an interview question template, mandatory safeguarding questions, and a bank of questions to select from, ensuring all criteria are assessed at interview.
- Interviews should be structured in advance, with clear allocation of questions among panel members.
- Questions must be competency-based to support the EFI Group's non-discriminatory equal opportunities policy.

Conducting Interviews and Interview Notes

Interviewing Candidates:

- All candidates must be asked the same core questions, and assumptions based on employment history must be avoided.
- Supplementary questions may be asked to clarify incomplete or ambiguous answers.
- Gaps or inconsistencies in employment should be explored with the candidate.
- Avoid questions unrelated to the job, such as personal or domestic circumstances. Legitimate questions may relate to working patterns or availability.
- The Chair of the panel is responsible for ensuring discriminatory questions are not asked.
- Panels are accountable for selection decisions.

Taking and Managing Interview Notes:

- Each panel member must take separate notes for each candidate, demonstrating how the candidate meets the knowledge, skills, experience, and abilities outlined in the person specification.

- Notes should include factual information, a score out of 5 (1 = poor, 5 = excellent), and record responses to all safeguarding questions at the end of the interview.
- Notes must be professional, factual, and non-discriminatory; derogatory or personal comments are unacceptable.
- After the interview, all notes must be uploaded to the Files section of the candidate's application in Access ATS.
- All notes and paperwork must also be returned to HR at the end of the process.

Compliance:

- Under GDPR, candidates may request access to interview notes.
- Maintaining accurate, professional notes is essential to defend against complaints or Employment Tribunal claims.

Feedback to Candidates

- It is good practice to offer feedback after interviews to all candidates.
- Feedback should be specific, honest, and related to the person specification, balancing strengths and areas for development. Feedback can be recorded via the ATS or via their interview notes.

Verbal feedback or a feedback meeting should be arranged for any internal candidates who are unsuccessful. This will help support their development, maintain engagement, and provide constructive guidance for future opportunities within the organisation.

5.8 Selection Assessments and Presentations

Job-related selection tests and candidate presentations are recommended as part of the selection process, as they provide a more well-rounded understanding of a candidate's suitability. For teaching roles, presentations and micro-teaches involving student participation and feedback are standard

If tests or presentations are used:

- All candidates must receive the same written information, including time allocation, topic areas, and any required preparation.
- Sufficient preparation time should be given, ideally one week for micro-teaches or presentations.
- Psychometric or other online tests may be administered by HR or via the EFI Group's approved online platform or test centre.
- All tests and presentations must be job-related, clearly explained, and non-discriminatory. The same conditions must apply to all candidates, except for reasonable adjustments for candidates with disabilities.
- Human Resources will confirm if candidates require any reasonable adjustments.

HR can provide advice on developing fair and effective selection tests to ensure consistency and compliance with equality legislation.

5.9 Appointment Decisions

Candidate Evaluation and Panel Decision Process

Once the interview process is complete, the panel should hold a discussion to review each candidate in turn, considering:

- The application form
- Interview responses
- Any selection tests, presentations, or assessments
- Candidates should be evaluated against the person specification and the job description, using the interview questions and assessment criteria to determine the most suitable appointment.

If no candidate is deemed appointable, Human Resources should be informed. A decision will then be made whether to:

- Re-advertise the vacancy, or
- Reconsider previously interviewed candidates.

Reporting Irregularities

If any panel member believes there has been an irregularity in the recruitment process that cannot be resolved by the panel, they must report it immediately to the Head of Human Resources.

Documentation

The Chair of the panel is responsible for ensuring that:

- Written notes clearly justify the selection of the successful candidate and the rejection of others.
- All interview notes, completed tasks, and notes from each panel member are collected and placed on the candidate's recruitment file or returned to HR.

Offers of Employment

- Employment offers must be made in consultation with Human Resources (HR).
- Offers may be made only after HR has reviewed and confirmed the panel's decision.
- The recruiting manager must complete a Job Offer Form to confirm the offer. HR will provide this form after the interview.
- HR will issue the formal offer letter or email, along with the Contract of Employment.
- Interview notes, documentation, and the completed Job Offer Form are required before any offer is made.
- It is recommended that the Lead Hiring Manager or Line Manager calls the successful candidate to verbally offer the role and discuss a suitable start date.

Recruitment will provide the offer letter with all terms and conditions to support this call.

- HR will then formally issue the offer in writing.
- All offers will be recorded and managed in the Access ATS system.

Conditions of Appointment

All offers are conditional on the candidate meeting the following requirements:

- Holding essential required professional qualifications, or willingness to complete them if required
- Satisfactory Enhanced DBS check with Child Barring
- Two satisfactory references
- Clean prohibition from teaching and section 128 checks (if applicable)
- Overseas checks (if applicable)
- Right to work in the UK for the duration of employment with the EFI Group
- Online Checks
- Fitness to perform the role (if required)
- Confidential Disclosure.

GDPR and Privacy

Prospective employees, workers, or contractors will receive a Privacy Notice explaining:

- What additional personal information is required
- How the information will be used and protected under GDPR law.

5.10 Salary

Salary offers will be made in light of internal salary comparators and the candidate's skills, qualifications, previous salary and experience. Consideration may also be given to the specialist or hard to fill nature of the post. All salaries should be checked in writing with Human Resources before being offered.

6. SAFER RECRUITMENT

The EFI Group is committed to adopting robust recruitment procedures that deter and prevent people who are unsuitable to work with children from applying for or securing either paid and voluntary posts with the EFI Group. The Group's recruitment procedures ensure that all staff and volunteers who come into our premises are subject to the highest level of checks applicable to the work they are carrying out.

At the EFI Group, safeguarding and promoting the welfare of children, young people and vulnerable adults is paramount. We expect all our staff and prospective staff to share this commitment.

Consequently, we are committed to adopting the most robust recruitment procedures. The EFI's recruitment procedures ensure that all staff and volunteers who come into our premises are subject to the highest level of checks applicable to the work they are carrying out. These include an identity check, a right to work check, an enhanced DBS check, overseas criminal record checks (where applicable), comprehensive employment reference checks (including reasons for any gaps in employment), prohibition from teaching checks (where applicable), verification of relevant qualifications, and online searches to identify any incidents or issues that need to be discussed with the applicant before commencing work at the EFI, to ensure their suitability to work with our students.

Please read our Safeguarding Policy [here](#) for further information.

6.1 Application

In order to deter unsuitable applicants and emphasise the EFI Group's commitment to safeguarding and promoting the welfare of children, the EFI Group's vacancy page includes a clear safeguarding statement detailing the checks that will be undertaken during the recruitment and selection process. The EFI Group's Safeguarding Policy is also clearly displayed on the EFI Group's vacancies web page. The application form includes the safeguarding statement and links prospective candidates to our safeguarding policy.

The EFI Group does not permit applications using only a CV. An application form is required and standardises all applications. A full job and education history is required and a section asking for reasons for any employment gaps is included.

Gaps in employment history will be discussed at interview. Safer Recruitment interview questions must be asked at all interviews.

All interview correspondence includes a safeguarding and confidential disclosure statement and links candidates to the Safeguarding and Confidential Disclosure Policy.

When applying for a role at the EFI Group, candidates will also be required to complete a Confidential Disclosure as part of the application form. The information provided will be treated confidentially and retained securely by Human Resources until an appointment is potentially made.

On the interview day, Human Resources will verify the identity of interview candidates and review and scan their personal documents. All interview candidates and visitors must be escorted at all times while on site.

6.2 Pre-interview

The application form contains reference details. All references that are able to be requested are done so prior to interview. All shortlisted candidates are required to complete a self-declaration of their criminal record whether “spent” or “unspent” and include any cautions and pending prosecutions or information which would make them unsuitable to work with children (with the exception of those that have been filtered out / “protected” as defined by the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (as amended) (England and Wales) Order 2020. This information is kept strictly confidential, until interview outcomes have been decided by the panel. The purpose of the self-declaration is so applicants have the opportunity to share relevant information and allow this to be discussed and considered at offer stage before a DBS certificate is received. The disclosure of convictions, cautions or pending cases will not necessarily prevent employment. A risk assessment will be completed where the nature of the conviction, when it took place, and its relevance to the post will be considered.

The Human Resources team will also verify a candidate’s identity through verifying an identification document such as a passport or birth certificate before/during the interview process, to be sure that the person interviewing is who they claim to be.

6.3 Interview

The interview panel should address any inconsistencies, gaps in employment and potential concerns at interview. Safeguarding is everyone’s responsibility, with the chair of the recruiting panel being ultimately responsible for ensuring these checks take place, seeking guidance from Human Resources as needed. The Human Resources team provide managers with a standard interview script template to ensure a consistent and thorough approach to the safeguarding elements of the interview.

6.4 Online checks

The EFI Group will complete an online search as part of its due diligence on candidates who are invited to interview. This is to help identify any incidents or issues that have happened that are publicly available online that need to be explored during interview and before commencing employment. Applicants will be advised of such checks on the EFI Group’s websites and interview correspondence. The EFI Group is an equal opportunities employer and these checks will not be used to discriminate unlawfully against any person on the grounds of any of the protective characteristics.

6.5 References

All successful applicants are made aware that an offer is contingent on obtaining a minimum of two satisfactory, suitable references. Applicants are required to add referee information to the application form when applying which details the EFI Group’s requirements in respect of suitable referees. References will be requested prior to interview when the applicant has given their consent for them to be acquired.

References are confidential and are only used for the purpose for which they were intended. They are sought by the Human Resources team as soon as possible after an offer is made to the individual. It is made clear to all appointed that the offer is contingent on suitable references and checks and if these cannot be obtained, the offer of employment will be withdrawn. If any concerns regarding the applicant come to light in the reference process, these details will be proportionately shared with the relevant members of staff (usually the recruiting manager, Director of Safeguarding and Student Services /DSL, and Head of Human Resources) to enable the concerns to be suitably addressed with the individual, and if appropriate, additional safeguards put in place. Where these concerns cannot suitably be alleviated, the employment will be withdrawn. Details of acceptable referees/references can be found on the application form.

6.6 Professional Qualifications

Essential qualifications for a post will be detailed within the personal specification. Appointees will be required to evidence that they hold any essential professional qualifications before their appointment can be confirmed. Human Resources will request and verify evidence of these as part of the pre-employment checks process.

In many instances, experience may be deemed equivalent to qualifications. In this instance, relevant experience should be verified through employment references.

On the rare occasion that an appointment is made where the appointee does not meet the essential qualification (or equivalent) requirements detailed on the personal specification, the recruiting manager will be required to provide written rationale for the exception, subject to the approval by the Head of Human Resources.

6.7 Criminal Record Checks – UK

Due to the nature of the EFI Group's work and its exemption from the provisions of Section 4 (2) of the Rehabilitation of Offenders Act 1974 by virtue of the Rehabilitation of Offenders Act 1974 (Exemptions) Order 1975, it is allowed to ask candidates, prospective and current employees, and other categories of workers, about their criminal convictions and relevant offences, and to obtain verification through the Disclosure and Barring Service (DBS).

Most appointments with the EFI Group will involve regularly working alongside students who are under 18, including in a non-teaching capacity. Therefore, this will be regarded as regulated activity which is subject to a satisfactory enhanced DBS check with children's barred list. Details of the variance in DBS checks can be found in appendix 1. The EFI Group also use the [GOV.UK](https://www.gov.uk) tool to determine the suitable level of check for a prospective employee.

The Group will not necessarily bar an applicant from employment due to a spent or unspent conviction; a risk assessment will be completed where the nature of the conviction, when it took place, and its relevance to the post will be considered. A

decision will then be made as to whether the risk can be suitably mitigated. In these cases, additional references would be sort.

The EFI Group will also adhere to any additional requirements for checking the suitability of people working with children or vulnerable adults as required by the Independent Safeguarding Authority.

6.8 Criminal Record Checks – Overseas

Where a person has been 'living or having lived' outside of the UK for three months or more in the last five years, a DBS check is not considered sufficient to establish suitability to work in a college. In addition to the DBS check and other pre-employment checks detailed in this policy, the EFI Group will request an original Overseas check from the prospective employee covering this period. If the application does not have this or it cannot be verified the Group will undertake a criminal record check in the countries the individual has inhabited in the previous 5 years. Depending on the circumstances, the EFI Group may also undergo additional checks / seek further information to ascertain the individual's suitability to work with children e.g. in the case of teaching positions, obtaining a letter (via the applicant) from the professional regulating authority (often the Department/Ministry of Education) in the country (or countries) in which the applicant has worked, if proportionate.

6.9 Prohibition from Teaching Checks

The EFI Group is required to take reasonable steps to ensure that no applicant to be employed to carry out teaching work is subject to a prohibition (from teaching) order issued by the Secretary of State, or any sanction or restriction imposed (that remains current) by the GTCE before its abolition in March 2012. Consequently, the EFI Group undertakes a prohibition from teaching check on any individual whose role is deemed to include "teaching work". "Teaching work" includes individuals who work regularly or in isolation with students such as LSA, counsellors and teaching assistants.

6.10 Section 128 Checks

The EFI Group undertakes an additional check, via the enhanced DBS check, for all applicants who are to be employed in management positions to ensure they are not subject to a section 128 direction made by the Secretary of State. A section 128 direction prohibits or restricts an unsuitable individual from participating in the management of an independent school, including academies and free schools. The EFI Group deems management positions in this context to be the Senior Managers, the Senior Leadership Team, the Principal, Governors and key budget holders.

6.11 Right to Work in the UK Check

The Immigration, Asylum, and Nationality Act 2006 make it an offence to employ anyone who does not have permission to be in, or work in, the UK. Applicants should

affirm their right to work in the UK upon applying for a role with the EFI Group, and Human Resources will request and verify evidence of all appointees' eligibility to work in the UK before the commencement of employment. All right to work checks are completed using the candidates Share code and a record is kept on file. All employees who do not hold a British or Irish passport are recorded on a separate file outlining their immigration status. Those with limited leave to remain have their end dates followed up by HR.

6.12 Medical Fitness to work

All employees are required to complete a medical fitness declaration at the start of their employment. This asks if they have any medical conditions they wish to declare, if they have previous absences from work and ask the employee to confirm their fitness to perform the role. Where the successful candidate is disabled, reasonable adjustments may need to be considered depending on their disability in consultation with them. This should be done as soon as possible after the appointment. The EFI Group has a duty to consider what reasonable adjustments can be made to working practices, or premises, or to enable access to goods, facilities, and services by disabled people. Where reasonable adjustments are agreed these must be recorded in writing. In certain circumstances an occupational health referral may be requested to find the best ways to support the employee.

6.13 Absence of Pre-Employment Checks

If there is a delay in receiving a DBS check before a person starts work, the Group may allow the member of staff to commence work with appropriate safeguards taken, for example, a risk assessment approved by the Director of Safeguarding and Student Services / DSL and Head of Human Resources. In such circumstances, the recruiting manager is responsible for completing a thorough risk assessment detailing how they intend to mitigate the risk of absent essential pre-employment checks, albeit temporarily e.g., the member of staff being accompanied at all times when at a student site. This risk assessment must be reviewed every 2 weeks and kept in the employee's personal file. This is also noted on the Single Central Register in the notes section. Recruiting managers should be aware that employment cannot commence without the appropriate sign off from the Director of Safeguarding and Student Services / DSL and Head of Human Resources and therefore, they should complete any risk assessment promptly. Recruiting managers are responsible for the strict adherence to any measures detailed in the risk assessment.

6.14 Safeguarding Induction

All staff will receive a safeguarding induction with a Designated Safeguarding Lead within their first week of employment. This will always take place before a member of staff undertakes any lone working with students. The safeguarding induction includes staff safeguarding responsibilities, an overview of the safeguarding reporting software and how to use this, the latest updates from Keeping Children Safe in Education and the EFI Groups' Safeguarding Policy.

All staff will also be required to complete training on child protection in schools, Prevent, and safer recruitment (if a recruiting manager) as part of their onboarding. This will usually be undertaken via e-learning modules but may also be undertaken face to face where appropriate.

All staff will also be required to attend an annual safeguarding update run by a Designated Safeguarding Lead.

6.15 Supervision during probation

Managers should be aware that safer recruitment does not end at satisfactory pre-employment checks and induction. Managers are required to ensure the expectations of a new joiner's role are clear to them, clearly outlining what is safe and unsafe practice and testing understanding. They should ensure that they continuously observe a new employee's attitude to children and young people as part of their probation period, and overall performance monitoring post probation. Managers should do this via a thorough departmental induction, providing ample of opportunities for observation, particularly lesson observations in the case of teaching staff. If a manager has any concerns regarding a new joiner whether in probation or post this, they should seek guidance from the Director of Student Services/DSL immediately.

7. TEMPORARY OR CASUAL STAFF

When employing temporary or casual staff on a short-term basis, the principles of good practice outlined in this policy will be followed. All offers should be made in consultation with the Human Resources team and will be subject to the Safer Recruitment checks outlined above. Where workers are employed via a recruitment agency, rather than the EFI Group directly, the recruitment agency must complete a form confirming the dates all employment checks were completed by them. Each worker will then show a member of the HR Team photo ID, Right to Work in the UK and their original DBS on their first day of work in order to be allowed on site without a Risk Assessment.

In instances, such as recruiting an agency temp or a temporary applicant at short notice, CVs alone may be used to shortlist. All relevant checks and references should still be conducted or proof of such checks sought from the agency.

External contractors such as Facilities staff, Café staff, Cleaners and Security will be required to complete the above process.

Email accounts and staff ID cards will not be issued until all required documentation has been provided and satisfactorily checked by Human Resources.

8. SINGLE CENTRAL REGISTER

The Single Central Register is held by the HR department. It is a record showing all safer recruitment checks, the date they were completed and who they were

completed by. All supporting documentation is held within employees' personnel files.

All staff employed regardless of contract type or volunteer in regulated activity within the EFI Group will be found on the Single Central Register. Any long-term contractor (e.g., facilities employee, cleaner) will be on the contractor tab of the Single Central Register. Governors' checks are held within their own tab.

9. EQUALITY OF OPPORTUNITY

The EFI Group is committed to applying its Equal Opportunities Policy at all stages of recruitment and selection. We carry out shortlisting, interviewing and selection without regard to an applicant's sex, gender identity, sexual orientation, marital or civil partnership status, skin colour, race, nationality, ethnic or national origins, religion or belief, age, pregnancy or maternity leave, or trade union membership. We will never exclude any candidate with a disability unless it is clear that the candidate is unable to perform a duty that is intrinsic to the role, having taken into account reasonable adjustments. Line managers must only ask a candidate question about their health where this is directly necessary for a particular role and, in any event, only once they have been shortlisted.

Reasonable adjustments will be considered at all stages of the recruitment and selection process to accommodate the needs of disabled candidates. Where the successful candidate is disabled, reasonable adjustments may need to be considered depending on their disability in consultation with them. This should be done as soon as possible after the appointment. The EFI Group has a duty to consider what reasonable adjustments can be made to working practices, or premises, or to enable access to goods, facilities, and services by disabled people. Where reasonable adjustments are agreed these must be recorded in writing.

All disabled candidates who meet the minimum requirements of the job as set out in the job description and person specification will be guaranteed an interview.

Applicants are asked to answer several equal opportunity questions. These questions help the EFI Group to monitor the effectiveness of this policy by gaining a picture of all those applying for and obtaining appointments, informing change accordingly, to increase the diversity of the applicant pool and those appointed, Only Human Resources will have access to this information which may be shared with key decision makers and senior managers on a need-to-know basis only, where the information has been adequately anonymised, and any information transmission methods used are secure.

9. CONFLICT OF INTERESTS

For all external candidates, if any applicant is known to any panel member either professionally or socially, or is a family member or relation, the panel member should declare it to Human Resources who will determine whether or not the panel member

should withdraw from the process in the interests of fairness and to prevent potential allegations of discrimination.

10. INDUCTION AND PROBATION

Induction of new staff into their role in the Group is an important aspect of staff recruitment. The recruiting manager and Human Resources are responsible for ensuring that the employee receives a thorough induction. This will usually include an:

- IT induction;
- Human Resources induction;
- Safeguarding induction;
- Finance induction;
- REMS induction (if required);
- Health & Safety induction;
- Library induction;
- Teacher induction (teaching staff only);
- Quality Assurance & Enhancement induction (teaching staff only);
- Line Manager introduction; and
- Introduction to the department.

Where line managers need the support of Human Resources in arranging introduction meetings with other key stakeholders, they should advise the Human Resources team of this, providing as much notice as possible, and a list of the additional appointments they wish to be arranged.

New staff will also receive mandatory training on safe working practices as part of their induction training to complete, where possible, prior to commencement of employment.

Line managers should set clear goals and objectives for the new employee, in line with the duties and responsibilities of the post as set out in the job description and progress should be reviewed at regular meetings using the Logbook via PeopleHR Access. Further advice and support about managing the probation of a new employee is available from Human Resources. Managers should also refer to the managing probation guidance document for more information.

Inductions are arranged as standard on a weekly basis and take place on Mondays. Human Resources will confirm the induction schedule and liaise with new joiners and line managers.

11. DATA PROTECTION

The EFI Group is committed to the safe and secure handling of all personal information collected, processed, stored, and in some instances shared throughout its recruitment and selection process.

It will regularly review what essential personal information is required to be processed, what the lawful basis for that processing is, what measures it has in place to safeguard and protect personal information, and it will ensure that throughout the recruitment and selection process it is transparent about how it uses personal information.

Under the GDPR, candidates have certain rights in relation to the processing of their information. The EFI Group's Data Protection Policy outlines how the EFI Group ensures compliance with relevant data and privacy protection legislation and regulations. Additionally, all job applicants will be issued with a Privacy Notice during the recruitment and selection process. It outlines in detail what candidates' rights are, how they can exercise these rights, and it explains how the Academy collects, processes, and safeguards personal information in accordance with the GDPR. Anyone with any concerns about the use of personal information in relation to this policy or the Group's recruitment and selection process should contact DPO@EFI Group.ac.uk

12. BREACHES OF POLICY

Any member of staff or applicants for employment with concerns about the application of this policy should raise their concerns in writing with the Head of Human Resources.

13. SUPPORT, ADVICE, AND INTERPRETATION

The Human Resources team will provide support and advice in the interpretation and application of this policy and any related procedures.

APPENDIX 1 - TYPES OF DBS CHECK AVAILABLE

Basic DBS check

This provides details of convictions and conditional cautions considered to be 'unspent' under the terms of the Rehabilitation of Offenders Act 1974.

Standard DBS check

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 DBS check

This provides the same information about convictions, cautions, reprimands and warnings held on the Police National Computer (PNC) as a Standard DBS check, plus additional information held by the police such as interviews and allegations. Additional information will only be disclosed where a chief police officer reasonably believes it to be relevant and considers that it ought to be disclosed. The position being applied for/or activities being undertaken must be covered by an exempted question in the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 and by provisions in the Police Act 1997 (Criminal Records) Regulations 2002.

Enhanced DBS check with children's barred list information

Where people are working or seeking to work in regulated activity relating to children, this allows an additional check to be made, about whether the person appears on the children's barred list, along with a check of the Police National Computer records plus additional information held by the police as above. The position being applied for or activities being undertaken must be eligible for an enhanced DBS check as above and be for a purpose listed in the Police Act 1997 (Criminal Records) (No2) Regulations 2009 as qualifying for a barred list(s) check. In addition, this check can also include information as to whether an individual is subject to a section 128 direction.

The EFI Group only accept Enhanced DBS's with children's barred list for all permanent staff.