



RECRUITMENT POLICY

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VERSION CONTROL SHEET

Version	Author	Review date	Changes	Approved by	Approval date
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
V3	Head of HR	September 2023	Updated in line with KCSIE 2023.	Principal	September 2023
V4	Head of HR	September 2024	Updated in line with KCSIE 2024 and Safer recruitment practices.	Principal	September 2024

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 Academy 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 this policy is designed to assist all those responsible for recruiting to achieve this aim, whilst taking into account of the:

- Equality Act 2010
- EFI GROUP's Equal Opportunities Policy
- EFI GROUP's 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 2024 (and any

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

4. ROLES & RESPONSIBILITIES

4.1 Recruiting managers

- 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.
- Agree the closing date for the vacancy, shortlisting date and interview process including dates where possible.
- All assessment processes should be robust, include both competency interviews and tasks when needed and ensure a fair process is conducted.
- Shortlisting should be completed within 2 days of the role closing.
- A minimum of 2 members of staff must shortlist and complete this separately, coming together to compare scores and make a final decision on the candidates.
- Shortlisting must be based on the specific skills and experience required for the role.
- A shortlisting grid is recommended and available to populate with specific criteria before the closing date.
- Promptly communicate the outcomes of interviews to Human Resources, both successful and unsuccessful applicants, including feedback and thorough interview notes.
- In collaboration with Human Resources, make an offer to the successful applicant, ensuring it is in line with the details of the approved vacancy.
- Strictly adhere to all safer recruitment requirements detailed in this policy, challenging colleagues as appropriate, and seeking guidance from Human Resources as needed.
- Adhere to all other aspects of the Recruitment Policy.

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.

- Provide recruiting managers with best practice advice in relation to recruitment and selection.
- Sitting on the recruitment panel where there is a specific need (due to the size of the Human Resources team, a presence on all panels is not possible and therefore, attendance should be requested by the recruiting manager).
- 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

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 Requests to Recruit form which must be authorised by the Principal, Director of Finance and Head of Human Resources. 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.

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. The Human Resource team will provide a job description template and the latest version of comparable job descriptions to aid the recruiting manager with creating.

The job description should clearly and accurately set out the:

- Job title
- Level of the post
- Post to whom the postholder is responsible
- Confirmation of salary
- Confirmation of working hours
- Key relationships
- About 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 in job descriptions should:

- Avoid jargon and unexplained acronyms and abbreviations.
- Be readily understandable to potential applicants (internal and external) for the post.
- Avoid ambiguity about responsibilities and be clear about the postholder's accountability for resources, staff, etc.
- Use inclusive language - for advice on non-discriminatory language consult the Human Resource team.

5.3 Personal Specification

The person specification is of equal importance to the job description and helps to inform the selection decision. The person specification details the essential skills, knowledge, experience, abilities, and expertise that are required to do the job. It should be drawn up after the job description and, with the job description, should inform the content of the job advert. The person specification should be specific, related to the job, and not unnecessarily restrictive, for example, only qualifications strictly needed to do the job should be specified. The inclusion of criteria that cannot be justified as essential for the performance of the job may be deemed discriminatory if this impacts disproportionately to the disadvantage of specific groups.

The person specification must form part of the further particulars of a vacancy along with the job description so that applicants have a full picture of what the job entails. The person specification enables potential applicants to make an informed decision about whether to apply and those who do apply, to give sufficient relevant detail of their skills and experience in their application. It should form the basis of the selection decision and enables the selection panel to ensure objectivity in their selection.

Essential criteria are those without which an appointee would be unable to adequately perform the job; desirable criteria are those that may enable the candidate to perform better or require a shorter familiarisation period.

Required abilities should be expressed in terms of the standards required, not just in terms of the task to be undertaken. For example, avoid statements such as 'Ability to write reports'; instead, indicate the expected standard, such as 'Ability to write detailed financial reports that encompass departmental budgeting, annual variances, and forecasting'.

Extreme care must be taken if physical requirements are specified. The Equality Act 2010 requires employers to make reasonable adjustments to a workplace or the way a job is carried out to make them suitable for people with a disability. It is therefore important that any physical requirement is stated in terms of the job that needs to be

done. For example, a job may require that the appointee 'must be able to travel to a number of different locations on Academy business'.

Care should also be taken to specifying a number of years' experience. Whilst substantial experience may be required for some roles, the time it takes to obtain this may be different depending on the individual and therefore, it could be perceived as discriminatory on the grounds of age to specify that a role requires 8 years' experience for example, when an applicant could have achieved the same level of competence through 5 years' experience and study.

Any role requiring specific physical characteristics, specific genders or anything criteria that may exclude applicants must be discussed with their HR Advisor and HR Manager in advance of the advert be placed.

5.4 Advertising the Vacancy

Vacancies will be advertised internally and externally (on the home page of the Human Resources management information system and the EFI Group website) as standard, and may also be advertised on external job boards such as Guardian, LinkedIn, and other appropriate channels to attract a wide variety of applicants.

Exceptions may be made to the standard approach where there is a sufficient business case to do so. Any exceptions must receive approval from the Head of Human Resources. Exceptions may include:

1. Where a role is ringfenced to a particular team or existing role within the EFI Group e.g., if another role is being removed from the staffing structure;
2. The need to recruit external expertise;
3. Posts being advertised internally only where a potentially suitable pool of applicants can be identified.

The use of external agencies is subject to approval by the Head of Human Resources. Recruiting managers should not contact recruitment agencies without prior authorisation and should contact the Human Resources team for advice and support with agencies and to source the most suitable and competitive agency for the requirements.

The Equality and Human Rights Commission advises that 'word of mouth' recruitment is likely to be indirectly discriminatory in terms of race and/or sex discrimination. It is very important therefore that all posts are advertised as widely as possible in media that reach underrepresented groups and that all applicants are treated in an equal way and given the same information and opportunity to make an application.

The Human Resource department will lead on all vacancy advertisement and is responsible for placing the advert and ensuring it provides all the relevant information.

5.5 Processing Applications and Shortlisting

The recruiting manager and Human Resource representative (usually the Recruitment Officer) will be responsible for dealing with enquiries from potential applicants. Managers must be aware that when dealing with enquiries about vacancies it is unlawful to state or imply that applications from one sex or from a particular racial group or individuals who have any other protected characteristics would be preferred and to do so may lead to a complaint of discrimination against the EFI Group. Care must also be taken when initiating contact with applicants (whether internal or external) to ensure that they are treated equally, for example with regard to invitations to visit the department, informal meetings to discuss the vacancy, and provision of information.

Application forms are required from all candidates to ensure safer recruitment processes. Applicants who apply using only a CV will be contacted by HR and asked to complete and upload the application form template to be added into the pool for selection.

Applications from candidates with a disability will not be excluded 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. Reasonable adjustments to the recruitment process will be made to ensure that no applicant is disadvantaged because of a disability.

The selection process is intended to give an opportunity for the panel to assess the relative merits of the shortlisted candidates against the job description and person specification. Shortlisting decisions sit with the panel, although, Human Resources will sift out any applicants who are not eligible to work in the UK.

The panel should avoid dismissing applicants who appear to be over-qualified. Assumptions should not be made about their reasons for applying for the post as they may eliminate an otherwise exemplary candidate. Conversations about motivation for applying can be had at interview.

Recruiting managers and a minimum of one additional panel member should undertake the shortlisting of all applicants using the recruitment system. They should review applications within 2 days of the closing date to ensure hiring is as efficient and timely as possible.

Best Practice: Shortlisting grids are sent to each manager when confirming the closing date and interview process with the Recruitment Officer. These should be populated with skills and experience criteria before the role closes. Once the role closes applicants will be assessed and scored against these criteria. Once all the panel have scored these scores will be reviewed together and the final selection confirmed through the recruitment system.

The recruiting manager will select a proposed next stage through the recruitment system e.g., Regret, Shortlisted, Regret After Interview, and provide a brief reason for their decision e.g., experience does not meet the required level detailed on the personal specification. Where applicants are shortlisted for interview, managers should follow up with their availability to interview so Human Resources can make the

arrangements. This can be done via the recruitment system, or by subsequently emailing recruitment@EFI Group.ac.uk.

The original applications for all applicants, together with a written note of reasons for shortlisting or rejecting applicants must be retained for 6 months from the date that an 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.

5.7 Conducting the Interview

The aim of the interview is to select the best candidate for the job. It is a two-way process during which the details of the job can be discussed and the candidate's suitability assessed.

Interviews should be scheduled as soon after the closing date as reasonably possible, as delays are likely to lead to a loss of candidates. Once a shortlist has been compiled, Human Resources will contact all candidates to arrange interviews, with the same details being provided to all candidates via email.

Initial screening calls are not permitted due to KCSIE guidelines. First stage interviews can take place on MS Teams however these need to consist of the full panel and use consistent questions asked to each candidate with notes taken.

The recruiting manager is responsible for selecting the interview questions; they must relate to the selection criteria outlined in the person specification and should be prepared before the interview, and remain consistent for every candidate. Human Resources will provide an interview script template, mandatory safeguarding questions, and a bank of interview questions for the recruiting manager to use to select from, ensuring all elements of the personal specification are assessed at either shortlisting or during one stage of the interview process.

The structure of the interviews should be decided in advance by determining who will chair the panel and who will be asking each question to avoid overlap or repetition, and panels may find it helpful to discuss their expectations of full answers to the questions, prior to the interview. Questions should be competency based in support of the EFI Group's non-discriminatory stance on equal opportunities.

The same areas of questioning should be covered with all candidates and assumptions should not be made regarding the expertise or abilities of candidates because of their employment history. Interview questions should be phrased so that they do not favour any one candidate or group of candidates. Supplementary questions should be used to probe for further information or clarification where answers are incomplete or ambiguous. Where the candidate's application reveals any unexplained gaps in employment or inconsistencies, these should be explored with the candidate at the interview.

Care must be taken to avoid questions that could be construed as discriminatory (e.g., questions about personal circumstances that are unrelated to the job). It is, for example, legitimate to ask for confirmation of whether individuals can comply with the working patterns of the post, but not to ask for details of their domestic or child care arrangements, etc. It is the responsibility of the Chair of the panel to ensure that such questions are not asked.

Staff conducting interviews must be aware that, although questions asked may not in themselves be discriminatory, the interpretation of answers by the panel could exhibit prejudice. For example, if indications of ambition were to be regarded as a worthy characteristic in applicants of one sex or ethnic group but not in another. Information regarding personal circumstances which is offered in the application or at an interview must not be taken into consideration in reaching a selection decision. For example, the fact that a male candidate shares details of his domestic circumstances with the panel but a female candidate chooses not to (or vice versa), should not be considered.

Interview panels act for the Group in making selection decisions and are accountable for them. Interview notes must be taken by each panel member to help the panel to make an informed decision based on the content of the interviews. Such notes must relate to how candidates demonstrate their knowledge, skills, experience, and abilities in relation to the person specification. Under the GDPR, candidates have the right to access information held about them, and therefore applicants may request disclosure of such notes in the event of a complaint and an Employment Tribunal would expect the Academy to have notes of every selection decision. The lack of such notes would seriously impede the Group's ability to contest such a complaint. Any inappropriate or personally derogatory comments contained within the notes could be considered discriminatory and are unacceptable. These informal notes, along with all paperwork relating to the interviews must be returned to Human Resources at the end of the selection process.

It is good practice to offer applicants feedback after interviews. Feedback should be specific, relating to the person specification, and honest. In feeding back to candidates it is good practice to balance the applicants' weaknesses with some positive points.

5.8 Selection Assessments and Presentations

It is advised to use job-related selection tests or asking candidates to give presentations as part of the selection process as this offers a more well rounded understanding of a candidate's suitability. Within teaching roles presentations and Micro Teaches with student participation and feedback are expected as standard.

If selection tests or presentations are to be used, all candidates should be given the same written information as to how long they will take, the topic area(s) they will cover, and what, if anything, they should prepare in advance.

Psychometric tests may only be administered by trained test administrators and any department wishing to use psychometric tests must contact Human Resources for advice.

In all cases, care should be taken to ensure that job-related tests are well explained in writing for candidates, in plain language, that all candidates are subject to the same tests under the same conditions, (excluding any allowances made as 'reasonable' adjustments to disabled candidates) and that presentation topics do not favour any one candidate.

It is very important that selection tests are non-discriminatory. Advice is available from the Human Resources department for those wishing to develop selection tests.

5.9 Appointment Decisions

When the selection process is complete, each candidate should, in turn, be discussed using the information obtained in the application, the interview, and any selection tests which will allow candidates to be assessed against the person specification, and a selection decision to be made. If no candidate is identified as appointable, Human Resources should be informed and a decision will be made whether to re-advertise the vacancy, or, to reconsider those candidates who were interviewed but not identified as appointable.

If a member of a selection panel feels that there has been any irregularity in the recruitment and selection procedure and the panel cannot resolve the matter at the time, they must report the matter without delay to the Head of Human Resources.

The Chair of the panel must ensure that a written note of the reasons for selecting the successful candidate and rejecting others is made and placed on the recruitment file, together with the original applications and notes from all the panel members.

Employment offers should be made in consultation with Human Resources. The recruiting manager may make an informal, conditional offer of employment as soon as possible following the interview, but, not before Human Resources has reviewed the interview forms and confirmed the decision with the recruiting manager.

All salary and package offers should be sent to HR in writing (email) to be confirmed before an offer will be made.

Human Resources will issue offer letters or emails along with a Contract of Employment.

All job offers are conditional on the appointee holding the required essential professional qualifications (or in some instances being willing to complete a professional qualification or certification), a satisfactory DBS check, 2 satisfactory references, a clean prohibition from teaching check, online check and a section 128 and overseas check where required. Have the right to work in the UK for the duration of employment with the EFI Group and if applicable, fitness to undertake a role or to work in a particular job environment, this will be made clear in the offer email.

At the appointment stage, prospective employees, workers, or contractors will be issued with a Privacy Notice to explain what additional personal information is required for the onboarding process and the employment relationship, how that information will be used and protected, and what rights employees, workers or contractors have with respect to GDPR.

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.

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.

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.

One member of all interview panels will be Safer recruitment trained.

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 in the application form. 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 Head of Wellbeing/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 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.

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;
- 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 Clear Review, the EFI GROUP's performance development review system. 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.

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](mailto:DPO@EFIGroup.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.