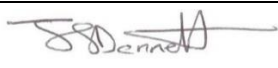


SAFER RECRUITMENT POLICY

Policy Information		
Version Number:	V2.2	Policy Operational date:
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Approved by Programme Committee:	Date: 27.04.23	Signed: 
Policy review date:	April 2026	

1. INTRODUCTION

The safe recruitment of staff, students and volunteers is the first step to safeguarding and promoting the welfare of all of Romsey Mill's service users. Romsey Mill is committed to safeguarding and promoting the welfare of children, young people and adults at risk and expects all staff and volunteers to share this commitment.

1.1 Aims and Objectives

The aims of the Safer Recruitment policy is to help deter, reject or identify people who might abuse children and young people or are otherwise unsuited to working with them by having appropriate procedures for appointing staff.

The aims of Romsey Mill's recruitment policy are as follows:

- to ensure that the best possible staff are recruited on the basis of their merits, abilities and suitability for the position;
- to ensure that all job applicants are considered equally and consistently;
- to ensure that no job applicant is treated unfairly or discriminated against on any grounds including race, colour, nationality, ethnic or national origin, religion or religious belief (except where a Genuine Occupational Recruitment (GOR) has been applied), sex or sexual orientation, marital or civil partner status, disability or age;
- to ensure compliance with all relevant legislation, recommendations and guidance including the statutory guidance published by the Department for Education (DfE), Keeping Children Safe in Education – September 2022(KCSIE), the Prevent Duty Guidance for England and Wales 2015 (the Prevent Duty Guidance) and any guidance or code of practice published by the Disclosure and Barring Service (DBS); and
- to ensure that Romsey Mill meets its commitment to safeguarding and promoting the welfare of children and young people by carrying out all necessary pre-employment checks.

Employees involved in the recruitment and selection of staff are responsible for familiarising themselves with and complying with the provisions of this policy.

Romsey Mill has a principle of open competition in its approach to recruitment and will seek to recruit the best applicant for the job. The recruitment and selection process should ensure the identification of the person best suited to the job at Romsey Mill based on the applicant's abilities, qualification, experience and merit as measured against the job description and person specification.

The recruitment and selection of staff will be conducted in a professional, timely and responsive manner and in compliance with current employment legislation, and relevant safeguarding legislation and statutory guidance (including Working Together to Safeguard Children 2018 and Prevent Duty Guidance).

If a member of staff involved in the recruitment process has a close personal or familial relationship with any applicant, they must declare it as soon as they are aware of the individual's application and avoid any involvement in the recruitment and selection decision-making process.

Romsey Mill aims to operate this procedure consistently and thoroughly while obtaining, collating, analysing, and evaluating information from and about applicants applying for job vacancies in the organisation.

1.2 Definition of Regulated Activity and Frequency

Any position undertaken at, or on behalf of Romsey Mill will amount to “regulated activity” if it is carried out:

- Frequently, meaning once a week or more; or
- Satisfies the “period condition”, meaning four times or more in a 30-day period; and
- Provides the opportunity for contact with children.

Roles which are carried out on an unpaid/voluntary basis will only amount to regulated activity if, in addition to the above, they are carried out on an unsupervised basis.

Romsey Mill is not permitted to undertake an Enhanced with Barred List check unless an individual will be engaging in “regulated activity”. Romsey Mill is required to carry out an enhanced DBS check for all staff, students, volunteers and trustees who will be engaging in regulated activity. Romsey Mill can also carry out an enhanced DBS check on a person who would be carrying out regulated activity but for the fact that they do not carry out their duties frequently enough i.e. roles which would amount to regulated activity if carried out more frequently.

2. ROLES AND RESPONSIBILITIES

It is the responsibility of the board of trustees to:

- Ensure that Romsey Mill has effective policies and procedures in place for recruitment of all staff and volunteers in accordance with statutory guidance and legal requirements.
- Monitor Romsey Mill’s compliance with such policies.

It is the responsibility of the CEO, Operations and Resources Manager, Designated Safeguarding Lead (DSL) and other managers involved in recruitment to:

- Ensure Romsey Mill operates safe recruitment procedures and makes sure all appropriate checks are carried out on all staff and volunteers who work for Romsey Mill.
- Promote the welfare of children and young people at every stage of the procedure.

The board of trustees has delegated the responsibility to the Leadership & Management Team to lead in all appointments. Trustees may be involved in staff appointments, but the final decision will rest with the LMT, except where the appointments are to the LMT itself.

3. SAFER RECRUITMENT PROCESSES

Romsey Mill follows a well-planned and structured recruitment procedure. The recruitment and selection of staff will be conducted in a professional, timely and responsive manner and in compliance with current employment legislation.

Safer practice in recruitment means thinking about and including issues to do with child protection and safeguarding and promoting the welfare of children/young people at every stage of the process. This starts with the process of planning the recruitment, where the post is advertised, ensuring that the advertisement makes clear Romsey Mill’s commitment to safeguarding and promoting the welfare of children / young people / adults at risk adults at risk.

The main elements of the process include:

- ensuring the job description makes reference to the responsibility for safeguarding and promoting the welfare of children / young people / adults at risk;
- ensuring that the person specification includes specific reference to suitability to work with children / young people / adults at risk;
- obtaining and scrutinising comprehensive information from applicants, and taking up and satisfactorily resolving any discrepancies or anomalies;
- obtaining independent professional and character references that answer specific questions to help assess an applicant's suitability to work with children / young people/ adults at risk and following up any concerns;
- a face-to-face interview wherever possible that explores the candidate's suitability to work with children/young people as well as his or her suitability for the post;
- verifying the successful applicant's identity;
- verifying that they have the Right to Work in the UK (where employed);
- verifying that the successful applicant has any academic or vocational qualifications claimed;
- checking his or her previous employment history and experience;
- verifying that s/he has the health and physical capacity for the job;
- carrying out an Enhanced Disclosure and Barring (DBS) check for roles in "regulated activity";
- where adults do not have a specific role working with children, but are likely to be in contact with children during the course of their work, the safer recruitment practices still apply.

4. RECRUITMENT AND SELECTION PROCEDURE

4.1 Advertising

To ensure equality of opportunity, Romsey Mill will advertise all vacancies to encourage as wide a field of applicant as possible; normally this entails an external advertisement.

Any advertisement will make clear Romsey Mill's commitment to safeguarding and promoting the welfare of children, young people and adults at risk. Reference will also be made regarding the need for the successful applicant to undertake an Enhanced DBS check, where appropriate, as well as including the details of the post, salary offered, qualifications required, etc.

All documents relating to applicants will be treated confidentially in accordance with the Data Protection Act 2018 (DPA18)

4.2 Application Form

Romsey Mill uses its own application form and all applicants for employment will be required to complete an application form containing questions about their academic and full employment history and their suitability for the role (in addition all applicants are required to account for any gaps or discrepancies in employment history). Applicants submitting an incomplete application form will not be shortlisted.

Romsey Mill will not accept a curriculum vitae drawn up by an applicant in place of an application form as they only contain the information the applicant wishes to present and may omit relevant details.

The application form will include the applicant's declaration regarding convictions and working with children, and will make it clear that the post is exempt from the provisions of the Rehabilitation of

Offenders Act 1974. Reference will also be made regarding the need for the successful applicant to undertake an Enhanced DBS check.

All applicants will be made aware that providing false information is an offence and could result in the application being rejected or summary dismissal if the applicant has been selected and possible referral to the police.

For all types of post the application form will request information on the following:

- Full identifying details of the applicant including current and former names, date of birth (*), current address, and National Insurance Number;
- A statement of any academic and/ or vocational qualifications the applicant has obtained that are relevant to the position for which s/he is applying with details of the awarding body and date of award;
- A full history in chronological order since leaving secondary education, including periods of any post-secondary education or training, and part-time and voluntary work as well as full-time employment, with start and end dates, explanations for periods not in employment, education or training, and reasons for leaving employment;
- A declaration of any family or close relationship to existing employees or employers (including trustees);
- Contact details for two referees. One referee should be the applicant's current or most recent employer. Where there is an applicant who is not currently working with children/young people but has done so in the past, it is important that a reference is also obtained from the employer with whom the person was most recently employed in work with children/young people. The form should make it clear that references will not be accepted from relatives or from people writing solely in the capacity as a friend.
- A statement of the personal qualities and experience that the applicant believes are relevant to his or her suitability for the post advertised and how s/he meets the person specification.

(*) Romsey Mill asks for this information as part of our equality monitoring. Anyone shortlisting candidates for interview / interviewing are not given this information.

4.3 Job Description and Person Specifications

A job description is a key document in the recruitment process and must be finalised prior to taking any other steps in the process. The job description should be reviewed to ensure compliance with safer recruitment procedures. This applies whatever the level of responsibility or duration of the appointment. The job description should clearly state:

- The main duties and responsibilities of the post;
- The values, ethos and faith-based motivation that drives all the work of Romsey Mill
- The individual's responsibility for promoting and safeguarding the welfare of children / young people / adults at risk and those s/he is responsible for or comes into contact with.

The person specification is of equal importance and informs the selection decision. It details the skills, experience, abilities and expertise that are required to do the job.

4.4 Candidate Information Pack

The application pack for roles at Romsey Mill will include:

- The application form, and explanatory notes or letter about completing the form.
- The job description and person specification;

- Any relevant information about Romsey Mill and the recruitment process and statements of relevant policies such as Equal Opportunities, Data Protection, Ethos and Values Statement, Safeguarding Policy, Safer Recruitment Policy.
- A statement of the terms and conditions relating to the post.

4.5 Scrutinising and Short-listing

At least two people will be involved in the process of short-listing applications. Equal opportunities monitoring forms will be removed prior to the shortlisting process and data will be compiled by the Operations and Resources Manager for statistical monitoring purposes.

All applications will be checked to ensure that they are fully and properly completed, that the information provided is consistent and does not contain any discrepancies, and to identify any gaps in employment. Incomplete applications will not be accepted and will not normally be returned for completion. Any anomalies or discrepancies or gaps in employment identified by the scrutiny will be noted so that they can be taken up as part of the consideration of whether to short-list the applicant. As well as reasons for obvious gaps in employment, the reasons for a history of repeated changes of employment without any clear career or salary progression, or a mid-career move from a permanent post to temporary work, will be explored and verified if a candidate is short listed.

All candidates will be assessed equally against the criteria contained in the person specification without exception or variation and will be done anonymously by removing/obscuring the applicant's name.

4.6 Involving Young People / Programme Participants

Involving young people or other Programme Participants is recognised as good practice for certain posts where appropriate. This involvement may be in the interview process, in asking of specific questions, during a short exercise or presentation within a group, or by showing/escorting the candidate around the building and providing informal feedback.

4.7 Interviews

There will be a face-to-face interview wherever possible, and a minimum of two interviewers will see the applicants for the vacant position. The interview process will explore the applicant's ability to carry out the job description and meet the person specification. It will enable the panel to explore any anomalies or gaps which have been identified in order to satisfy themselves that the chosen applicant can meet the safeguarding criteria (in line with Safer Recruitment Training)

The panel will agree a set of questions that they will ask all candidates relating to the requirements of the post, and the issues they will explore with each candidate, based on the information provided in the candidate's application. Notes will be made during the interview so a record can be kept and used for evidence.

Members of the interview panel should:

- have the necessary authority to make decisions about appointments;
- be appropriately trained, at least one member of the panel should have undertaken safer recruitment training
- highlight any specific questions that may be relevant from the individual application forms, such as gaps in employment or other anomalies.

In addition to assessing and evaluating the applicant's suitability for the particular post, the interview panel will also explore:

- the candidate's attitude toward children and young people;

- his or her ability to support Romsey Mill's agenda for safeguarding and promoting the welfare of children/young people;
- gaps in the candidate's employment history; and
- concerns or discrepancies arising from the information provided by the candidate. The panel should also ask the candidate if they wish to declare anything in light of the requirement for a DBS Check.

4.8 References

References will not normally be taken up until after the interview process and therefore any offer of employment made will be dependent on the outcome of such references. Romsey Mill seeks references for the purpose of obtaining objective and factual information to support appointment decisions.

If the applicant is currently working with children/young people, on either a paid or voluntary basis, his or her current employer will be asked about disciplinary offences relating to children/young people, including any for which the penalty time is expired (that is where a warning could no longer be taken into account in any new disciplinary hearing for example) and whether the applicant has been the subject of any child protection concerns, and if so, the outcome of any enquiry or disciplinary procedure. If the applicant is not currently working with children/young people but has done so in the past, that previous employer will be asked about those issues.

Referees will be asked for the following:

- Length of time the person has known the applicant and in what capacity;
- Post held, with dates, salary and reasons for leaving;
- Ability and suitability to work with children and young people;
- Skills, strengths and weaknesses and how these have been demonstrated;
- Any current disciplinary investigation and/or sanction;
- Any allegations and/or disciplinary investigations relating to the safety or welfare of children and young people and the outcome of these;
- Details of any criminal convictions or cautions;
- Number of days they have been absent in the last 2 years;
- If the referee would re-employ the applicant and, if not, details of why;
- Verification of the identity of the referee.

Romsey Mill will not accept open references, testimonials or references from relatives.

4.9 Feedback to candidates

Unsuccessful applicants will be offered the opportunity to get feedback on their interview performance. Feedback should focus on areas of strength as well as areas for improvement. It is important not to compare their answers with other applicants though it is legitimate to give examples of how their answers could have been more relevant or appropriate to the job.

5. OFFER OF APPOINTMENT AND NEW EMPLOYEE PROCESS

5.1 Pre-Appointment Checks

An offer of appointment to the successful candidate should be conditional upon:

- the receipt of at least two satisfactory references (if those have not already been received);
- verification of the candidate's identity (if that could not be verified straight after the interview);

- where the position amounts to “regulated activity” the receipt of an enhanced disclosure from the DBS which Romsey Mill considers to be satisfactory;
- where the position amounts to “regulated activity” confirmation that the applicant is not named on the Children’s Barred list;
- verification of the candidate’s medical fitness; a medical questionnaire should be completed during the application process and presented if asked to attend an interview;
- verification of professional qualifications deemed necessary for the post or which the applicant otherwise cites in support of their application (if not verified after the interview);
- verification of the applicants right to work in the UK; and
- any further checks which are necessary as a result of the applicant having lived or worked outside the UK.

Whether a position amounts to “regulated activity” must therefore be considered in order to decide which checks are appropriate. It is however likely that in nearly all cases Romsey Mill will be able to carry out an enhanced DBS check and a Children’s Barred List check.

A personal file checklist will be used to track and audit paperwork obtained in accordance with Safer Recruitment Training. The check list will be retained on personal files.

5.2 The Rehabilitation of Offenders Act 1974

The Rehabilitation of Offenders Act 1974 does not apply to positions which involve working with, or having access to children and young people. Therefore, any convictions and cautions that would normally be considered ‘SPENT’ **must be** declared when applying for any position at Romsey Mill.

5.3 DBS (Disclosure and Barring Service) Check

If a DBS Check reveals information that a candidate has not disclosed in the course of the selection process then the CEO should make the decision after consultation with any relevant line managers, whether or not the offer will be upheld. This may involve a further interview with the candidate.

It is Romsey Mill’s policy that the DBS disclosure **must be** obtained before the commencement of employment of **any** new employee.

It is Romsey Mill’s policy to re-check employees’ DBS Certificates every three years and in addition any employee who takes leave for more than three months (i.e. maternity leave, long term sick or career break etc.) must be re-checked before they return to work.

Members of staff at Romsey Mill are aware of their obligation to inform the CEO of any cautions or convictions that arise between these checks taking place.

Where:

- the candidate’s DBS Check shows s/he has been disqualified from working with children / young people by a Court; or
- an applicant has provided false information in, or in support of, his or her application; or
- there are serious concerns about an applicant’s suitability to work with children/young people

Romsey Mill managers should consider the need to report relevant information to the police and/or the County Council’s Safeguarding team.

5.4 Portability of DBS Certificate Checks

Staff may wish to join the DBS Update Service if they are likely to require another check in the future. Applicants may sign up to the Service for a yearly fee, which is payable by the applicant.

This allows for portability of a Certificate across employers. Romsey Mill will:

- Obtain consent from the applicant to carry out an update search.
- Confirm the Certificate matches the individual's identity.
- Examine the original certificate to ensure that it is for the appropriate workforce and level of check, i.e. enhanced certificate

5.5 DBS Certificate

The DBS no longer issue Disclosure Certificates to employers, therefore employees / applicants/ volunteers should bring their original Certificate to Romsey Mill for approval (for employees this should be within 7 days of issue or for applicants before they commence work). A record of the disclosure number should be kept on HR file and the single central record.

5.6 Dealing with convictions

Romsey Mill operates a formal procedure if a DBS Certificate is returned with details of convictions. Consideration will be given to the Rehabilitation of Offenders Act 1974 and also:

- the nature, seriousness and relevance of the offence;
- how long ago the offence occurred;
- one-off or history of offences;
- changes in circumstances;
- decriminalisation and remorse.

A formal meeting with the applicant will take place face-to-face to establish facts with the CEO or DSL. A decision will be made following this meeting and the completion of a risk assessment. In the event that relevant information (whether in relation to previous convictions or otherwise) is volunteered by an applicant during the recruitment process or obtained through a disclosure check, the CEO and DSL will evaluate all of the risk factors above before a position is offered or confirmed.

If an applicant wishes to dispute any information contained in a disclosure, they may do so by contacting the DBS. In cases where the applicant would otherwise be offered a position were it not for the disputed information Romsey Mill may, where practical and at its discretion, defer a final decision about the appointment until the applicant has had a reasonable opportunity to challenge the disclosure information.

5.7 Proof of identity, Right to Work in the UK & Verification of Qualifications and/or professional status

All applicants invited to attend an interview at Romsey Mill will be required to bring their identification documentation such as passport, birth certificate, driving licence etc. with them as proof of identity/eligibility to work in UK in accordance with the Immigration, Asylum and Nationality Act 2006 and DBS identity checking guidelines.

Where an applicant claims to have changed their name by deed poll or any other means (e.g. marriage, adoption, statutory declaration) they will be required to provide documentary evidence of the change. In addition, applicants must be able to demonstrate that they have actually obtained any academic or vocational qualification required for the position and claimed in their application.

5.8 Medical Fitness

All applicants will be requested to complete a medical questionnaire and where appropriate a doctor's medical report may be required. This information will be reviewed against the Job Description and the Person Specification for the particular role, together with details of any other physical or mental requirements of the role.

Romsey Mill is aware of its duties under the Equality Act 2010. No job offer will be withdrawn without first consulting with the applicant, obtaining medical evidence and considering reasonable adjustments.

5.9 Induction

An induction procedure will take place for all staff and volunteers newly appointed, regardless of previous experience. The purpose of induction is to:

- provide training and information about Romsey Mill's policies and procedures;
- support individuals in a way that is appropriate for the role for which they have been engaged;
- confirm the conduct expected of staff within the organisation;
- provide opportunities for a new member of staff or volunteer to discuss any issues or concerns about their role or responsibilities; and
- enable the person's line manager or mentor to recognise any concerns or issues about the person's ability or suitability at the outset and address them immediately.

The content and nature of the induction process will vary according to the role and previous experience of the new member of staff or volunteer, but as far as safeguarding and promoting the welfare of children / young people / adults at risk is concerned the induction programme should include information about, and written statements of:

- policies and procedures in relation to safeguarding and promoting welfare e.g. Safeguarding, Health and Safety and Equality and Diversity policies
- safe practice and the standards of conduct and behaviour expected of staff and volunteers;
- how and with whom any concerns about those issues should be raised; and
- other relevant personnel procedures e.g. disciplinary, capability and Disclosure (whistle blowing). The programme should also include attendance at child protection training appropriate to the person's role.

5.10 Probationary employment period

All staff are subject to a 6-month probationary period; please refer to Romsey Mill's Probationary Period Policy for details. During this time new staff should be supported to become effective members of the team and their performance should be monitored by their manager. Any cause for concern or identification of additional training requirements may lead to an extension of the probationary period by a further 2 months. During probation the employer and employee are subject to one week's written notice of termination of employment.

5.11 Single Central Record

In addition to various staff records kept in individual personnel files, a single centralised record of recruitment and vetting checks is kept. This is kept up to date and contains details of the following:

- all employees who are employed to work for Romsey Mill;
- all others who have been chosen by Romsey Mill to work in regular contact with children. This will cover volunteers, trustees and people who come into Romsey Mill to deliver regular sessions but who are not staff members, e.g. tutors or midwives.

A designated Trustee will be responsible for auditing the Single Centralised Register and reporting their findings to the full board of Trustees during October's meeting.

5.12 Ongoing Employment

Romsey Mill recognises that safer recruitment and selection is not just about the start of employment, but should be part of a larger policy framework for all staff. Romsey Mill will therefore provide ongoing training and support for all staff, as identified through regular supervisions and the Annual Review/appraisal procedure.

5.13 Record retention

When an applicant is successful in their application, Romsey Mill will retain on their personnel file any relevant information provided as part of the application process. This will include copies of documents used to verify identity, right to work in the UK, medical fitness and qualifications. Medical information may be used to help Romsey Mill to discharge its obligation as an employer, e.g. so that Romsey Mill can consider reasonable adjustments if an employee suffers from a disability or to assist with any other workplace issue.

This documentation will be retained by Romsey Mill for the duration of the successful applicant's employment. All information retained on employees and volunteers is kept centrally in a locked and secure cabinet.

The same policy applies to any suitability information obtained about volunteers involved with Romsey Mill's activities.

Romsey Mill will retain all interview notes on all unsuccessful applicants for a period of 6 months, after which time the notes will be confidentially destroyed (i.e. shredded). The 6-month retention period is in accordance with the General Data Protection Regulations (GDPR) [DPA18].

5.14 Monitoring and Evaluation

Monitoring of both the recruitment process and induction arrangements will allow for future recruitment practices to be better informed. It will cover:

- staff turnover and reasons for leaving;
- exit interviews; and
- attendance of new recruits at safeguarding training.

Statistics from Equal Opportunities forms will be gathered following each recruitment campaign and will be examined to seek to ensure that as wide a pool of applicants as possible, from a wide range of backgrounds, progress through the selection procedure. This will help inform future decisions about where to place adverts, how to word them to encourage a diverse range of applicants etc.