



Safer Recruitment Policy

Including DBS

First Copy Approved by: Sarah Sturmeay
Chief Executive

A handwritten signature in blue ink that reads "Sturmeay." with a large, sweeping flourish at the end.

Signed:

Date: February 2020

Date	Comment	
February 2020	First Pure Insight Policy	B Harris

Policy Aims

- To help deter, reject or identify people who might abuse adults at risk or people who are unsuitable for the type of work the company carries out.
- The company operates a principle of open competition in its approach to recruitment and will seek to recruit the best applicant for the job.
- The recruitment process should help the identification of the person best suited to the job

Advertising

The company will advertise all vacant posts to encourage as wide a field of applicants as possible, normally this entails an external and internal advertisement but when appropriate may be an internal advert only.

Recruitment literature will include the company's commitment to safeguarding and promoting the welfare of adults at risk, young people and children.

Applications and disclosure (see below for further information on DBS)

We accept CV's with a completed Application form. Applicants will be asked to complete the company's Disclosure Form/declaration regarding

- any convictions,
- barring them from working with adults at risk
- barring them from working with young people or children
- dismissals from previous jobs and conflicts of interests e.g. relationships with existing employees.

The declaration makes it clear that the post is exempt from the provisions of the Rehabilitation of Offenders Ac.

If applicants refuse to complete the Disclosure Form/declaration their application will not be considered.

The Declaration makes all applicants aware that providing false information is an offence and could result in their application being rejected or summary dismissal if the applicant has been selected plus possible referral to the police and other professional regulatory bodies.

All documentation relating to applicants will be treated confidentially in accordance with the Data Protection Act, including the new GDPR 25 May 2018

Job Descriptions and Person Specifications

Will clearly and accurately set out the duties and responsibilities of the job role.

Person Specification details the skills, experience, abilities and expertise that are required to do the job. The person specification will include a specific reference to suitability for working with adults at risk, young people or children as appropriate.

Interviews

There will always be a face-to-face interview and the same panel will see all 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 that have been identified in order to satisfy themselves that the chosen applicant is a safe appointment. It is common practice for a 2nd and 3rd interview to take place with our young people involved.

Any positive disclosure of information in regard to past disciplinary action, cautions or convictions will be discussed and considered in the circumstance of the individual case either during the interview or after the selection interview in a further meeting. The company's Positive Disclosure Questionnaire will be completed and submitted to the HR Director prior to a job offer being made.

Job offer and new appointment process

The appointment of new employees is subject to the receipt of a satisfactory Disclosure and Barring Service (DBS) Enhanced Certificate and barring check for adults/children where the job involves protected activity.

All new appointees must supply two satisfactory references, complete the company's health questionnaire, and provide proof of identity/right to work in the UK.

The HR (Pure Innovations) Department will contact the appointing Manager to confirm that all documentation has been received and a start date can be agreed.

References

References will be taken up immediately after interview and prior to an offer of employment being confirmed. Two references must be provided as described on the application form and state suitability to work with children and young people.

The company does not accept open references, testimonials or references from relatives.

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 adults at risk, young people or children. Therefore, any convictions and cautions that would normally be considered 'SPENT' must be declared when applying for a position.

All employees carrying out protected activity require an enhanced DBS Certificate and barring check before the commencement of employment.

Portability of DBS Certificates

Portability refers to the re-use of a DBS Certificate obtained for a position in one organisation and later used for another position in another organisation. The company does not accept DBS Certificates carried out by another organisation unless they are registered with the DBS Update Service. The company requests that all employees engaged in protected activity to register for the Update Service and will reimburse the registration fee and annual Subscription fees whilst employed by Pure Insight or Pure Innovations

Procedure for Dealing with convictions (Risk Assessment – if appropriate)

The company 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;
- Whether the information was disclosed during recruitment;
- How long ago the offence occurred;
- One-off or history of offences;
- Changes in circumstances,
- Decriminalisation, rehabilitation and remorse.

Carrying out the risk assessment

Decisions about whether or not to employ someone whose vetting checks raised concerns should be made on a case-by-case basis. A risk assessment will help you work out whether they are suitable to work with children and young people.

You should only share information about an applicant's criminal record with those who need to know. The applicant should be told who in the organisation knows about his/her record.

The applicant will usually know about any information revealed during the course of a vetting or barring check. You should discuss any concerns with them as part of the risk assessment process.

- Past convictions might be a great source of anxiety and embarrassment for the person concerned, so you need to act with sensitivity and empathy.
- Take all reasonable steps to gather as much relevant information as possible.
- Make sure a third party is present during the discussions. Ask a colleague who was involved in the recruitment process to support you and take notes.
- Carefully plan the questions you need to ask in advance and keep the discussion focused on the individual, their feelings and attitudes.

- It is not your responsibility to decide whether a legal decision was right or fair – you need to decide whether the applicant is suitable to work or volunteer with children and young people.

Making the decision

The reasons for your decision should be objective, rational and easy to understand. Write these down and keep them in a securely lockable cabinet, along with the notes you made during your investigations.

Things to consider include:

- the nature of the offence and its seriousness
- the relevance of the offence to other staff, volunteers, children and their families
- the length of time since the offence took place
- the length of the sentence
- whether the offence was an isolated incident or part of a pattern or history of offending
- the circumstances which led to the offence being committed
- whether these circumstances have changed (if so, do these changes increase or reduce the likelihood of similar offences happening in future?)
- whether the individual has changed since the offence (if so, what has led to the change and does this reduce or increase the likelihood of them committing further offences?)
- the level of remorse expressed by the applicant and/or any efforts to change
- whether the new role provides opportunities to re-offend
- any legal constraints relevant to the role, for example if the person has lost their driving licence and the role requires driving.

Confidential information

If the vetting and barring check includes additional information that is marked "in confidence", you should not discuss it with the applicant. This could compromise a criminal investigation or the safety of another person, and may in itself constitute a criminal offence under the [Police Act 1997](#).

If you decide not to appoint someone on the basis of confidential information, you need to be careful when you inform them that the offer is withdrawn. It is sufficient to tell the applicant that, on the basis of checks and references that have been made, you have had to withdraw the provisional job offer.

Process

If the offence has been disclosed a meeting will take place with the Operations Manager or appointed person. The candidate will be asked to bring their copy of the certificate to see if the disclosure matches the application form.

Depending on the offence, age, circumstances etc. a decision may be made at that meeting and the POSITIVE DISCLOSURE FORM – Appendix 1 Will be completed and passed to the CEO for approval. Or the appointed person will speak to the CEO before the decision is made.

There are 3 options the Appointed person must consider on the Positive Disclosure Form

1. The disclosure match and I have taken into consideration the nature of the disclosure, the seriousness, remorsefulness and the length of time since the offences and **I am happy to recommend to the CEO to employ this person**
2. The disclosure does not match but the offences are as such that after discussion **I am happy to recommend to the CEO to employ this person:**
The differences, in brief are / and comments:
3. The disclosure does not match and the discrepancy is such that **I need to discuss further with CEO**

We also have processes for the following

- Proof of identity, Right to Work in the UK & Verification of Qualifications and/or professional status
- Overseas checks (for employees who have lived outside the uk)
- Centralised records Record retention / Data Protection compliance / Deep Storage
- All appointed applicants will be required to provide their identification documentation such as: Passport, Birth Certificate plus National Insurance number, Biometric Residency Permit etc. as proof of identity/eligibility to work in UK in accordance with the rules set out in the Immigration, Asylum and Nationality Act 2006 and DBS Code of Practice Regulations.
- Where required, applicants must be able to demonstrate with original, documentary evidence that they have obtained the academic or vocational qualification/professional status for the position they have been offered.
- Appointed applicants must complete a Health Questionnaire to assess whether any reasonable adjustments or a risk assessment is needed before a job offer is confirmed. Where appropriate a referral to Occupational Health for a medical report may be required.
- Overseas checks
- All new employees who have lived outside the UK are subject to additional checks in accordance with Immigration, Asylum and Nationality Act 2006. The company will seek advice in accordance with the UK Border Agency Code of Practice.

- All new employees will be given an induction programme which will clearly identify the company's policies and procedures.