Luccombe Hub This document forms part of the policy handbook and is intended for use at Luccombe Hub	
Title:	**Safer Recruitment**
Subject Area:	Whole Centre
Applies:	Immediately
Issued/Review Date:	21 May 2025
Next Review:	NLT 20 May 2026
Sponsor:	Henri Monier-Williams in conjunction with SLT
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1. Introduction

The Luccombe Hub is committed to safeguarding and promoting the welfare of children and young people and requires all staff and volunteers to share and demonstrate this commitment in every aspect of their work.

We are committed to using disciplinary procedures that deal effectively with staff who fail to comply with the centres safeguarding and child protection procedures and practices, including referring any allegation of abuse against a staff member working with children to the Local Authority Designated Officer (LADO).

A referral will be made if a staff member has[1]:

- behaved in a way that has harmed a child, or may have harmed a child
- possibly committed a criminal offence against or related to a child
- behaved towards a child or children in a way that indicates he or she would pose a risk of harm if they work regularly or closely with children.
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

1.1 Aims

The purpose of this policy is to set out the requirements of a recruitment process that aims to:

- Attract the best possible applicants to vacancies
- Deter/prevent prospective applicants who are unsuitable to work with children or young people
- Identify and reject applicants who are unsuitable to work with children or young people.

The appointment of all employees/Contractors will be made on merit and in accordance with the provisions of Employment Law and Keeping Children Safe in Education. We will ensure that people are treated solely on the basis of their abilities and potential, in line with our Single Equality Scheme.

[1] *All allegations of abuse of children by those who work with children must be taken seriously. Allegations against any person who works with children, whether in a paid or unpaid capacity, can cover a wide range of circumstances.*

1.2 Consultation

The Luccombe Hub will communicate this policy to all staff, relevant professionals and learners through inductions, meetings, day to day communications, staff meetings and training. A copy of this policy and all policies will be available on request or via the website.

1.3 Legislation and guidance

- Keeping Children Safe in Education (KCSIE) 2025
- Working together to keep children safe 2023.
- Equality Act 2010
- The Teachers' Disciplinary (England) Regulations 2012
- The School Staffing (England) Regulations
- The Education (Pupil Referral Units) (Application of Enactments) (England) Regulations 2007 (used to inform best practice)
- Rehabilitation of Offenders Act (ROA) 1974. The amendments to the ROA 1974 (Exceptions Order 1975, (2013 and 2020)
- https://www.gov.uk/government/publications/dbs-filtering-guidance
- Safeguarding Vulnerable Groups Act 2006
- The Education and Training (Welfare of Children) Act 2021
- UK GDPR & Data Protection

2. Procedures and practice

2.1 Steps

Information for Applicants

All applicants will be provided with:

- A Job Description/Person specification outlining the duties of the post and personal qualities required for the role
- Standardised Job Application Form to complete.
- An email or verbal description of the centre and relevance to the vacant post. Potential candidates are encouraged to review The Luccombe Hub Website to understand the therapeutic educational setting and its ethos and vision.
- Reference to the Safeguarding Policy, Safer Recruitment Policy, DBS checking and other pre-employment requirements
- The closing date for the receipt of applications

Short Listing and Reference Requests

The selection panel made up of Henri Monier-Williams (Principal), Lucie Wharton (Education Lead) and where required Nita Dooley (Head of AP) or Kath Oxlee (Finance) will shortlist applicants against the Person Specification for the post.

The criteria for selection are consistently applied to all applicants and refers to the following criteria:

- Qualifications and relevance to the role.
- Experience required for the role
- Quality of Application

- Employment History

The selection panel will agree which applicants will be invited to interview.

Interviews

Before the interviews, the selection panel will agree on the interview format. Selection process will be determined by the nature and duties of the vacant post, but all vacancies will require an interview of short-listed candidates. Interviews will always be face-to-face.

Candidates invited to interview will receive a letter/email or telephone call confirming the day of the interview and the format for the day, who they will be meeting with.

The questions asked during the interview will be aimed at obtaining evidence of how each candidate meets the requirement of the Job Description and the Person Specification and each candidate will be assessed against all of the criteria for the post. The same areas of questioning will be covered for each applicant and no questions which would discriminate directly or indirectly on protected characteristics under the Equality Act will be asked.

The selection process for every post will include exploration of the candidate's understanding of child safeguarding issues.

Candidates will always be required:

- To explain satisfactorily any gaps in employment
- To explain satisfactorily any anomalies or discrepancies in the information available to the selection panel
- To declare any information that is likely to appear on a DBS disclosure.
- To demonstrate their capacity to safeguard and protect the welfare of children and young people.

The interview will also include a discussion of any convictions, cautions or pending prosecutions, other than those protected, that the candidate has declared and are relevant to the prospective employment.

The recruitment documentation will be retained. In line with GDPR legislation, applicants have the right to request access to notes written about them. After 6 months, all information about unsuccessful candidates will be securely destroyed.

References:

A minimum of two references, one of which must be from the candidate's current/most recent employer will be required and details of referee is required on the application form. Candidates are entitled to see and receive copies of their employment references and should request these from their referees.
Where a candidate supplies referees from the same employer, details of a third referee (preferably from a post involving work with children) will be requested from the candidate and/or contact will be made to a previous employer mentioned on the application form.

References will be sought directly from the referee and, where necessary, s/he will be contacted to clarify any anomalies or discrepancies. Copies of any such exchanges will be kept.

Where necessary, previous employers who have not been named as referees may be contacted in order to clarify any such anomalies or discrepancies. Detailed written records will be kept of such exchanges.

If a candidate for a post working with children/Young Persons is not currently employed in a post working with children, a reference will be sought from the most recent employment in which the candidate has worked with children to confirm details of the candidate's employment and his/her reasons for leaving. A standard reference pro-forma is used, which requires confirmation of:

- The referee's relationship to the candidate
- Details of the candidate's current/previous post and salary
- The candidate's performance history and conduct
- Whether the candidate has been subject to capability procedures and the outcome of this
- Whether the candidate has been subject to disciplinary action relating to the safety and welfare of children, including where the sanction has expired, and the outcome of this.
- Details of any substantiated allegations or concerns about the candidate relating to the safety and welfare of children
- Whether the referee has any reservations as to the candidate's suitability to work with children and young people (if so, the centre will ask for specific details of the concerns and the reasons why the referee believes the candidate may be unsuitable to work with children)
- The candidate's suitability for the post with explicit reference to the job description and person specification. All appointments are subject to satisfactory references, vetting procedures and satisfactory DBS checks. References are the "property" of the selection panel and strict confidentiality will be observed.

References must be in writing and be specific to the job for which the candidate has applied. Additional character references may be requested in addition where a person is only able to provide one work related reference.

References will be verified and any discrepancies or areas of potential concern will be discussed with the candidate at interview if provided prior to interview.

If the field of applicants is felt to be weak, the post may be re-advertised.

Pre-appointment checks

An offer of appointment to a successful candidate, including one who has lived or worked abroad, will be conditional upon satisfactory completion of pre-employment checks.

When appointing new staff/service providers/contractors/facilitators, we will:

- Verify a candidate's identity from current photo ID (originals) and proof of address (originals) except where, for exceptional reasons, none is available; further advice will be sought if this is the case.
- Obtain a certificate for an enhanced DBS check with childrens barred list information where the candidate will be engaging in regulated activity.
- Obtain a separate barred list check if applicable, an individual will be judged as suitable to start work in regulated activity before the DBS enhanced disclosure is available.
- Verify the candidate's mental and physical fitness to carry out their work responsibilities (a job applicant can be asked relevant questions about disability and health to establish whether they have the physical and mental capacity for the specific role)
- Verify the candidate's right to work in the UK (if there is uncertainty about whether an individual needs permission to work in the UK, then we will seek further advice from appropriate sources

- Make any further checks that we consider appropriate if the candidate has lived or worked outside the UK including information on sanctions or restrictions imposed by European Economic Area (EEA) professional regulating authorities.
- The role within The Luccombe Hub Centre can be physically and emotionally demanding, Wellbeing and Safety of staff and learners is priority and therefore The Luccombe Hub will issue all possible new employees/staff a Pre-Employment Health Questionnaire to complete. All information provided will be dealt with in the strictest confidence. HMW will review the information provided and where necessary may take further steps to seek clarification of fitness to work from the applicants GP and/or refer to The Luccombe Hub's Occupational Health Provider.
- Verify professional qualifications (original certificates), as appropriate.
- The Luccombe Hub follows best practice and will make checks of online presence and may search any relevant social media accounts, where required, further questions may be asked. We are committed to Safeguarding our learners and the wellbeing of all.

Offered Employment

The offer of employment by the selection panel and acceptance by the candidate is binding on both parties,

Personnel file and selection information for the successful candidate will be retained securely and confidentially for the duration of his/her employment including:

- Application
- Interview notes – including explanation of any gaps in the employment history.
- References – minimum of two
- Proof of identity
- Proof of right to work in the UK (if applicable)
- Proof of relevant academic qualifications
- Evidence of DBS clearance (removed from file after 6 months in line with GDPR and best practice), Barred List (where applicable) – the DBS Retention Policy is at Annex A.
- Offer of employment letter and signed contract of employment/Service Agreement.

Procedure for positive disclosure - DBS checks

Safeguarding at The Luccombe Hub is of utmost importance. One of the pre-employment checks is an Enhanced DBS check.

Whilst The Luccombe Hub understands that judgment errors can be made in life and we look for positive changes and seek to uphold the essence of The Offenders Rehabilitation. We must ensure this is balanced against safety of our children and staff at the Centre.

Where a positive disclosure is made, such disclosure will be dealt with on a case by case basis and full details should be supplied by the proposed new employee about any convictions/positive disclosure and the circumstances around that disclosure.

The Luccombe Hub will undertake further checks and make additional enquiries where it is felt further investigation is needed and seek guidance and support from other agencies, if required.

Due to the additional emotional needs of our learners, any prospective employee with a positive disclosure in relation to GBH, ABH, Resisting Arrest or any conviction in relation to harassment or aggressive

behaviour will be subject to a detailed risk assessment of their suitability prior to any offer of employment being made. Any offer of employment will only be made once the selection panel have reviewed and agreed the risk assessment.

Reference to the duties to be undertaken with the role, will be made, when making a decision on receipt of a positive disclosure and a record of the decision process will be kept on file for up to 6 months for those where the decision has been made not to continue with the offer of employment and up to 25 years for those taken into the employment of The Luccombe Hub in accordance with our record keeping audit for staff members.

Start of Employment and Induction

The pre-employment checks listed above must be completed before the employee starts work. Exceptions will only be made in circumstances where a risk assessment has been undertaken. Exceptions will never be made in the case of the Barred List.

All new employees will be provided with an induction programme which will cover all relevant matters of Centre policy including safeguarding and promoting the welfare of children, child protection procedures, whistle blowing and guidance on safe working practices.

2.2 Roles and responsibilities

The Luccombe Hub will:

- Ensure the centre has effective policies and procedures in place for the safe and fair recruitment and selection of staff/service providers and volunteers. Using guidance from Department for Education and any legal requirements.
- Ensure that appropriate staff/service providers have completed safer recruitment training and that a minimum of 1 person interviewing a candidate has undertaken safer recruitment training.
- Ensure that the centre operates safe and fair recruitment and selection procedures which are regularly reviewed and updated to reflect any changes to legislation and statutory guidance.
- Ensure that all appropriate checks have been carried out on staff/service providers and volunteers at the centre.
- Monitor any contractors' and agencies' compliance with this document.
- Promote the safety and well-being of children and young people at every stage of this process.

The Centre Lead will aim to involve at least one appropriate member in the appointment of all staff/service provider/contractors and also in the appointment of other posts, where possible. Selection panels will comprise a minimum of two people. Any internal recruitment process will follow the procedures set out in this policy.

2.3 Aspects

Advertising

All vacant posts will be advertised to ensure equality of opportunity and encourage as wide a field of candidates as possible. This will normally mean placing an advertisement externally. However, where there are two or more internal applicant that wish to apply for a position, then the Centre may recruit directly from within. The same safer recruitment process will be followed.

All advertisements for posts, paid or unpaid, will include the following statements or words to the effect of: "The Luccombe Hub are committed to safeguarding and promoting the welfare of children and young

people and requires all staff and volunteers to share and demonstrate this commitment" "The successful candidate will have to meet the requirements of the person specification and will be subject to pre-employment checks, including an enhanced check from the Disclosure and Barring Service (DBS check) and satisfactory references."

Volunteers

We carry out DBS and pre-start vetting checks appropriate to the volunteer role (as above) and require regular volunteers to provide details of two referees. References are taken up, as detailed in this policy. Volunteers who help on an occasional basis (e.g. trips/events) are supervised, in accordance with legislation and are referred to our Student Placement & Volunteers Policy.

Students on placement/Work Experience

When volunteers are working at the centre as part of a recognised training course (such as Social Work, EAQ, etc.), references and completion of a full application form will not be required. However, we will require proof of DBS enhanced clearance with barred list check and will carry out identity checks when the student arrives at the centre. Contact with any course provider will be made for the arrangement of work placements and relevant risk assessments carried out.

Contractors

We ensure that contractors, or any employee of the contractor, working at the centre for more than twice per week or 6 times in a 30 day period have been subject to the appropriate level of DBS check, if any such check is required. Contractors and contractors' employees for whom an appropriate DBS check has not been undertaken will be supervised if they will have contact with children. If a contractor working at centre is self-employed and will be in regulated activity, we will consider obtaining the DBS check, as self-employed people are not able to make an application directly to the DBS on their own account. We will check the identity of contractors and their staff on arrival at the Centre. This policy will be regularly reviewed and updated to reflect any changes to legislation and statutory guidance

Safer Recruitment and Single Central Record (SCR)

- All staff, volunteers, and regular visitors are subject to safer recruitment procedures, including relevant pre-employment checks.
- The school maintains a Single Central Record (SCR) of all recruitment and safeguarding checks, including:
  - Identity verification
  - Enhanced DBS checks
  - Right to work in the UK
  - Qualifications (where applicable)
  - Prohibition from teaching checks (for relevant roles)
  - Any other relevant checks required by statutory guidance
- The SCR is updated promptly whenever new staff are recruited or when existing staff undergo additional checks.
- Renewed DBS certificates are recorded on the SCR
- The SCR is monitored regularly by the Principal and governors to ensure compliance with statutory safeguarding requirements.
- All recruitment decisions are informed by safer recruitment procedures

3. Concluding notes

3.1 Monitoring and review
This policy will be reviewed annually or sooner as required to ensure best practice and to adhere to Governmental guidance.

3.2 Links to other policies

This policy should be read with all other safeguarding and child protection policies together with Staff Code of Practice, Equality Policy and UK GDPR & Data Protection Policy.

Annex A to
Safer Recruitment Policy
Dated May 2025

Luccombe Hub This document forms part of the policy handbook and is intended for use at Luccombe Hub	
Title:	The Luccombe Hub Policy on Disclosure Barring Service (DBS) Application and Retention
Applies:	Immediately
Issued:	20th May 2025
Next Review:	19th May 2028
Sponsor:	Henri Monier-Williams
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LUCCOMBE HUB POLICY ON DBS RETENTION POLICY

1. Introduction

The Luccombe Hub use the Disclosure and Barring Service (DBS) checking service, in accordance with our Safer Recruitment Policy, to help assess the suitability of potential employees and continued suitability of staff working at Luccombe.

The Luccombe Hub complies fully with the code of practice regarding the correct handling, use, storage, retention and disposal of certificates and certificate information. Luccombe Hub also complies fully with its obligations under the General Data Protection Regulation (GDPR), Data Protection Act 2018 and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of certificate information.

2. Application

The Luccombe Hub use an umbrella company, Access Personal Checking Service (APCS) to apply for staff DBS. We will provide the applicant (anyone potential or existing staff) with an application number and password. Before an application is made, an applicant must give their consent for the DBS checks to be made. Should an applicant refuse consent, we will not be able to employ the person or continue with their employment with Luccombe.

3. Handling

We are an organisation that requires the retention of certificate information to demonstrate 'safer recruitment' practice. The information recorded is limited to certificate number and issue date. On occasion it may be necessary for us to keep the DBS certificate on file, for the duration of a person's appointment. This is typically when an entry has been identified on the certificate and the risk to the learners is considered minimal. This is at the discretion of the Principal.

4. Retention

The Luccombe Hub will only record the DBS number and date issued on the Single Central Record, as well as on an employee personnel file unless there is a need to retain the certificate (see para 3 above).

5. Destruction

Luccombe Hub will destroy, by shredding, all supporting documents as soon as an acceptable DBS has been received; any certificate retained due to an entry will remain on file for 6 years post-employment or 6 months if a decision not to appoint was made.