



## Safer Recruitment Policy

### **High Impact Academic Coaching Ltd**

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**Audience:** All Staff

**Owner:** Managing Director (MD)

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1. **Introduction:** The safe recruitment of staff is the first step to safeguarding and promoting the welfare of children in education. High Impact Academic Coaching is committed to safeguarding and promoting the welfare of all pupils in its care. As a Recruitment Company, High Impact Academic Coaching expects all Associates, support agencies and volunteers to share this commitment.

2. **Aims and Objectives:** The aims of the Safer Recruitment policy are to help deter, reject, or identify people who might abuse pupils or are otherwise unsuited to working with them by having appropriate procedures for appointing staff. The aim of High Impact Academic Coaching's recruitment policy is 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 on any grounds including race, colour, nationality, ethnic or national origin, religion or religious belief, 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 2025 - (KCSIE), the Prevent Duty Guidance for England and Wales 2023 (the Prevent Duty Guidance) and any guidance or code of practice published by the Disclosure and Barring Service (DBS)
- To ensure that High Impact Academic Coaching 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. High Impact Academic Coaching 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 position at High Impact Academic Coaching, 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 KCSIE 2025 and Prevent Duty Guidance). If a member of staff involved in the recruitment process has a close personal or familial relationship with an applicant, they must declare it as soon as they are aware of the individual's application and avoid any involvement in the recruitment, selection, and decision-making process. High Impact Academic Coaching aims to operate this procedure consistently and thoroughly while obtaining, collating, analysing, and evaluating information from, and about, applicants applying for job vacancies through High Impact Academic Coaching.

3. **Roles and Responsibilities:** It is the responsibility of Mr Kevin Fryer, Managing Director to:

- Ensure High Impact Academic Coaching has effective policies and procedures in place for recruitment of all Associates and volunteers, in accordance with DfE guidance and legal requirements.
- Monitor High Impact Academic Coaching's compliance with them.
- Ensure that High Impact Academic Coaching operates safe recruitment procedures and makes sure all appropriate checks are carried out on all Associates and volunteers who work through High Impact Academic Coaching.
- To monitor contractors' and agencies' compliance with this document.
- Promote welfare of children and young people at every stage of the procedure. The MD will lead in all appointments and the final decision will rest with him.

#### 4. Definition of Regulated Activity and Frequency:

Any position undertaken at, or on behalf of High Impact Academic Coaching will amount to 'regulated activity' if it is carried out:

- Satisfies the 'period condition', meaning four times or more in a 30-day period.
- 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. High Impact Academic Coaching is not permitted to check the Children's Barred

List unless an individual will be engaging in 'regulated activity'. High Impact Academic Coaching is required to carry out an enhanced DBS check for all staff, supply staff and governors who will be engaging in regulated activity. However, High Impact Academic Coaching 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.

#### 5. Recruitment and Selection Procedure:

5.1 Advertising: To ensure equality of opportunity, High Impact Academic Coaching will advertise all vacant posts to encourage as wide a field of applicant as possible, normally this entails an external advertisement. Any advertisement will make clear High Impact Academic Coaching's commitment to safeguarding and promoting the welfare of children. All documentation relating to applicants will be treated confidentially in accordance with the Data Protection Act (DPA18).

5.2 Application Forms: High Impact Academic Coaching 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.

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. CVs will not be accepted. It is unlawful for High Impact Academic Coaching to employ anyone who is barred from working with children. It is a criminal offence for any person who is barred from working with children to apply for a position at High Impact Academic Coaching. 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 referral to the police and/or the DBS.

5.3 Job Descriptions 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. It will clearly and accurately set out the duties and responsibilities of the job role. 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. The person specification will include a specific reference to suitability to work with children in a special school environment.

5.4 References for short-listed applicants will be sent for immediately after short-listing. The only exception is where an applicant has indicated on their application form that they do not wish their current employer to be contacted at that stage. In such cases, this reference will be taken up immediately after interview. All offers of employment will be subject to the receipt of a minimum of two references which are considered satisfactory by High Impact Academic Coaching. One of the references must be from the applicant's current or most recent employer. If the current/most recent employment does/did not involve work with children, then the second reference should be from the employer with whom the applicant most recently worked with children. The referee should not be a relative. References will always be sought and obtained directly from the referee and their purpose is to provide objective and factual information to support appointment decisions. All referees will be asked whether they believe the applicant is suitable for the job for which they have applied and whether they have any reason to believe that the applicant is unsuitable to work with children. Referees will also be asked to confirm that the applicant has not been radicalised, so that they do not support terrorism or any form of 'extremism'. Please note that no questions will be asked about health or medical fitness prior to any offer of employment being made. Any discrepancies or anomalies will be

followed up. Direct contact by phone will be undertaken with each referee to verify the reference. High Impact Academic Coaching does not accept open references, testimonials, or references from relatives.

## **5.5 INTERVIEWS**

**5.5 Interviews:** There will be a face-to-face or online interview wherever possible. One or more interviewers will meet with the applicants for the vacant position, and the final decision will be made by the MD. The interview process will explore the applicant's ability to carry out the job description and meet the person specification. It will enable the MD to explore any anomalies or gaps which have been identified in order to satisfy himself that the chosen applicant can meet the safeguarding criteria (in line with Safer Recruitment Training).

High Impact Academic Coaching ensures that at least one member of any interview panel has successfully completed Safer Recruitment Training. For all interview panels, where applicable, Christopher Burd, who is Safer Recruitment trained, will participate to ensure appropriate safeguarding measures are upheld throughout the interview process.

Any information in regard to past disciplinary action or allegations, cautions or convictions will be discussed and considered in the circumstance of the individual case during the interview process, if it has been disclosed on the application form. All applicants who are interviewed will be required to provide evidence of their identity, address, and qualifications. Only original documents will be accepted, and photocopies will be taken. Unsuccessful applicant documents will be destroyed 6 months after the recruitment programme.

## **6. Offer of Appointment and New Employee Process:**

**6.1 Pre-Employment Checks:** In accordance with the recommendations set out in KCSIE, High Impact Academic Coaching carries out a number of pre-employment checks in respect of all prospective Associates. If it is decided to make an offer of employment following the formal interview, any such offer will be conditional on the following:

- The agreement of a mutually acceptable start date and the signing of a contract incorporating High Impact Academic Coaching's standard terms and conditions of employment.
- Verification of the applicant's identity (if not previously been verified).
- The receipt of two references (one of which must be from the applicant's most recent employer) which High Impact Academic Coaching considers to be satisfactory, for positions which involve 'teaching work'.

i. High Impact Academic Coaching being satisfied that the applicant is not, and has never been, the subject of a sanction, restriction or prohibition issued by the Teaching Regulation Agency (formerly National College for Teaching and Leadership), or any predecessor or successor body, or by a regulator of the teaching profession in any other country which prevents the applicant working at High Impact Academic Coaching or which, in High Impact Academic Coaching's opinion, renders the applicant unsuitable to work at High Impact Academic Coaching; and

ii. High Impact Academic Coaching being satisfied that the applicant is not, and has never been, the subject of any proceedings before a professional conduct panel or equivalent body in the UK or any other country for any reason which prevents the applicant working through High Impact Academic Coaching or which, in High Impact Academic Coaching's opinion, renders the applicant unsuitable to work through High Impact Academic Coaching.

- Where the position amounts to 'regulated activity' the receipt of an enhanced disclosure from the DBS which High Impact Academic Coaching considers to be satisfactory.
- Where the position amounts to 'regulated activity' confirmation that the applicant is not named on the Children's Barred List.
- Confirmation that the applicant is not subject to a direction under section 142 of the Education Act 2002 which prohibits, disqualifies, or restricts them from providing education at a school, taking part in the management of a school, or working in a position which involves regular contact with children.

- Confirmation that the applicant is not subject to a direction under section 128 of the Education and Skills Act 2008 which prohibits, disqualifies, or restricts them from being involved in the management of a school.
- Verification of the applicant's medical fitness for the role.
- Verification of the applicant's right to work in the UK.
- Any further checks which are necessary as a result of the applicant having lived or worked outside of the UK.
- Verification of professional qualifications which High Impact Academic Coaching deems a requirement for the post, or which the applicant otherwise cites in support of their application (where not previously verified). Whether a position amounts to 'regulated activity' must therefore be considered by High Impact Academic Coaching, in order to decide which checks are appropriate. It is however likely that, in nearly all cases, High Impact Academic Coaching 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 checklist will be retained on personal files.

6.2 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 pupils. Therefore, any convictions and cautions that would normally be considered 'SPENT' must be declared when applying for any position at High Impact Academic Coaching.

6.3 DBS (Disclosure and Barring Service) Check: High Impact Academic Coaching applies for an enhanced disclosure from the DBS and a check of the Children's Barred List (now known as an Enhanced Check for

Regulated Activity) in respect of all positions at High Impact Academic Coaching which amount to 'regulated activity' as defined in the Safeguarding Vulnerable Groups Act 2006 (as amended). The purpose of carrying out an Enhanced Check for Regulated Activity is to identify whether an applicant is barred from working with children by inclusion on the Children's Barred List and to obtain other relevant suitability information. It is High Impact Academic Coaching's policy that the DBS disclosure must be obtained before the commencement of placement of any new Associate. Associates of High Impact Academic Coaching are aware of their obligation to inform the MD of any cautions or convictions that arise between these checks taking place. DBS checks will still be requested for applicants with recent periods of overseas residence and those with little or no previous UK residence.

6.4 Portability of DBS Certificates Checks Staff may wish to join the DBS Update Service if they are likely to require another check in the future. High Impact Academic Coaching 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 it is for the appropriate workforce and level of check, i.e. enhanced certificate/enhanced including barred list information. The Update check would identify and advise whether there has been any change to the information recorded, since the initial Certificate was issued. Applicants will be able to see a full list of those organisations that have carried out a status check on their account.

6.5 DBS Certificate: The DBS no longer issues Disclosure Certificates to employers; therefore employees/applicants should bring their original Certificate to High Impact Academic Coaching (for employees within 7 days of issue or applicants before they commence work or any project involving regulated activity).

- Dealing with convictions: High Impact Academic Coaching 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 will take place face-to-face to establish the facts. A decision will be made following this meeting. 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 MD 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, High Impact Academic Coaching may, where practicable and at its discretion, defer a final decision about the appointment until the applicant has had a reasonable opportunity to challenge the disclosure information.

6.6 Secretary of State Prohibition Orders (Teaching & Management roles): In all cases where an applicant is to undertake a teaching role of any kind, a Prohibition Order check will be made using the Employer Access Online Service. It is anticipated that this will be performed at offer stage. A person who is prohibited from teaching must not be appointed to work as a teacher in such a setting. Prohibition orders are made by the Secretary of State following consideration by a professional conduct panel convened by the Teaching Regulation Agency. Pending such consideration, the Secretary of State may issue an interim prohibition order if it is considered to be in the public interest to do so.

6.7 Proof of identity, Right to Work in the UK & Verification of Qualifications and/or professional status: All applicants invited to attend an interview at High Impact Academic Coaching 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. High Impact Academic Coaching does not discriminate on the grounds of

age. 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 legally required for the position and claimed in their application form.

6.8 Medical Fitness: High Impact Academic Coaching is legally required to verify the medical fitness of anyone to be appointed to a post through High Impact Academic Coaching, after an offer of employment has been made but before the appointment can be confirmed. All applicants are 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. High Impact Academic Coaching 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.

7. Record Retention/Data Protection: High Impact Academic Coaching is legally required to undertake the above pre-employment checks. Therefore, if an applicant is successful in their application, High Impact Academic Coaching 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 High Impact Academic Coaching to discharge its obligations, e.g. so that High Impact Academic Coaching may consider reasonable adjustments if an Associate suffers from a disability or to assist with any other workplace issue. This documentation will be retained by High Impact Academic Coaching for the duration of the successful applicant's engagement by High Impact Academic Coaching. All information retained on Associates is kept centrally in the Human Resources Office in a locked and secure cabinet. The same policy applies to any suitability information obtained about volunteers involved with School activities. High Impact Academic Coaching 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].

8. Ongoing Engagement: High Impact Academic Coaching recognises that safer recruitment and selection is not just about the start of engagement but should be part of a larger policy framework for all Associates. High Impact Academic Coaching will therefore provide ongoing training and support for all Associates, as required.

8.1 Leaving the Register at High Impact Academic Coaching: Despite the best efforts to recruit safely, there will be occasions when allegations of serious misconduct or abuse against children and young people are raised. This policy is primarily concerned with the promotion of safer recruitment and details the pre-engagement checks that will be undertaken prior to engagement being confirmed. Whilst these are pre- engagement checks, High Impact Academic Coaching also has a legal duty to make a referral to the DBS in circumstances where an individual:

- Has applied for a position through High Impact Academic Coaching despite being barred from working with children; or
- has been removed by High Impact Academic Coaching from working in regulated activity (whether paid or unpaid), or has resigned prior to being removed, because they have harmed, or pose a risk of harm to, a child. If the individual referred to the DBS is a teacher, High Impact Academic Coaching may also decide to make a referral to the Teaching Regulation Agency.

#### **Year-on-Year Document Review**

Review Date	Reviewer Name	Changes Made / Notes	Next Review Date
01/10/25	Kris Geddes	Changes to KCSIE Sept 25 updates	01/10/26