



# SAFER RECRUITMENT AND CODE OF PRACTICE POLICY

Document reference QT76P1

## Safer Recruitment Policy Statement

Any offer made to a successful candidate is conditional on satisfactory completion of the necessary pre-starter checks and agreement to any periodic vetting updates, if required for role. Qualitrain ensures all appropriate measures are applied in relation to everyone who works for or volunteers with Qualitrain including:

- Obtaining at least two satisfactory references (normally from previous and current employers) and check previous employment history and gaps in employment, as the company consider appropriate for a role
  - Verifying identity, professional qualifications and right to work in the UK.
  - Obtaining an appropriate criminal record check for the job role, as applicable
  - 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
  - A prohibition from teaching check, if applicable
  - Where a successful applicant has worked or been resident overseas such checks and confirmations as the Company may consider appropriate through referring to *Keeping Children Safe in Education*, so that any relevant events that occurred outside the UK can be considered.
  - Other screening checks if considered necessary. For instance:
    - Due to role, such as a senior officer, but as stipulated in job description, if applicable (For instance, Disqualified Director and Bankruptcy and Insolvency Register searches)
    - For an existing employee, if there is an allegation that a person could pose a risk of harm to others, particularly to children, then the guidance in Part 4: Allegations of abuse made against teachers and others within *Keeping Children Safe in Education* should be followed.
  - Conducting a risk assessment if a potential risk is identified
  - Keeping a single central record detailing the safeguarding checks carried out.
- Evidence: Safeguarding Matrix QT76WR1 Location: Sharepoint/Quality and Compliance\18. Safeguarding Master.

Our Safer Recruitment Work Instruction (QT76P1WI1) explains the steps to be followed to conduct these pre-start checks, as well as how to record any applicable updates undertaken during a person's engagement with Qualitrain. Our Selection, Pre-Start and Vetting, Induction, Probation, Development, Performance and Termination Procedure (QT3P2) and Recruitment Policy provide details on broader new starter systems. Qualitrain complies with the Rehabilitation of Offenders Act through the Recruitment of Ex-Offenders Policy (QT3P2e).



## **Code of Practice: Handling, use, storage, retention and disposal of DBS certificates and certificate information**

### **General principles**

As an organisation using the Disclosure and Barring Service (DBS) checking service to help assess the suitability of applicants for positions of trust, Qualitrain Limited complies fully with the code of practice regarding the correct handling, use, storage, retention and disposal of certificates and certificate information.

It 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 and has a written policy on these matters, which is available to those who wish to see it on request.

### **Storage and access**

Certificate information is kept securely, in lockable, non-portable, storage containers with access strictly controlled and limited to those who are entitled to see it as part of their duties.

### **Handling**

In accordance with section 124 of the Police Act 1997, certificate information is only passed to those who are authorised to receive it in the course of their duties. We maintain a record of all those to whom certificates or certificate information has been revealed and it is a criminal offence to pass this information to anyone who is not entitled to receive it.

### **Usage**

Certificate information is only used for the specific purpose for which it was requested and for which the applicant's full consent has been given.

### **Retention**

Once a recruitment (or other relevant) decision has been made, certificate information must not be retained, unless retention will allow for the consideration and resolution of any disputes or complaints (maximum 90 days) or be for the purpose of completing safeguarding audits (maximum 6 months).

Throughout this time, the usual conditions regarding the safe storage and strictly controlled access will prevail.



Note: *Keeping Children Safe in Education*, referenced in *Ofsted Inspecting Safeguarding in Early Years, Education and Skills* (Accessed 26/01/2021), states that schools and colleges do not need to keep copies of DBS certificates, and when it does should not be retained for more than six months to comply with the requirements of the Data Protection Act 2018.

## 2.6 Disposal

Once the retention period has elapsed, we will ensure that any DBS certificate information is immediately destroyed by secure means, for example by shredding, pulping or burning. While awaiting destruction, certificate information will not be kept in any insecure receptacle (e.g. waste bin or confidential waste sack).

We will not keep any photocopy or other image of the certificate or any copy or representation of the contents of a certificate. However, notwithstanding the above, we may keep a record of the date of issue of a certificate, the name of the subject, the type of certificate requested, the position for which the certificate was requested, the unique reference number of the certificates and the details of the recruitment decision taken.

We will retain ID checker signed consent declaration and applicant signed consent declaration (or copy of Candidate Remote DBS Submitted email, as applicant consent needed for email generation), and if applicable, risk assessment, and a copy of a right to work document and a copy of driving licence for those who drive for work, if these were used as DBS ID evidence and not already on file. Any other evidence provided will not be needed for compliance purposes and destroyed.

Source: Based on an adapted version of Disclosure Barring Service Handling of DBS Certificate Information which was accessed online (<https://www.gov.uk/government/publications/handling-of-dbs-certificate-information/handling-of-dbs-certificate-information>) on 26<sup>th</sup> January 2021.