

# Safeguarding Children and Safer Recruitment Policy



NOW Education adheres to a strict policy when it comes to safeguarding, encompassing the full recruitment process in continual monitoring of all of the staff that we provide to Schools, Nurseries, and other clients alike.

NOW Education recruits staff according to the latest DFE Keeping Children Safe in Education guidance. We independently and internally audited, ensuring we upkeep our high standards and commitment to best practice.

We employ an in-house Compliance Team with a member based in each office to constantly monitor and assess the suitability of the temporary workers we provide to Schools and other settings. Before they are deployed to work, each candidate is thoroughly vetted and independently checked by this specialist team of experienced Compliance Officers with any queries being forwarded to the Compliance Manager, Hayley Terrans-Robson who also carries out internal, termly audits.

## Pre-Employment Checks for Temporary Workers

As specified in the Conduct of Employment Agencies and Employment Business Regulation 2003 (the Conduct Regulations), before introducing a candidate to a client, NOW Education will make checks to ensure the candidate is sufficiently suitable and where applicable, qualified for the position. NOW Education will confirm in writing with the client that the necessary background checks have been completed and any results where required.

*All temporary staff placed by NOW Education will have the following background checks conducted on them prior to be cleared to work and a position offered:*

- Childcare Disqualification (where applicable)
- Identity check
- Address check
- Healthcare Declarations
- Eligibility to work in the UK
- Reference checks (in line with DFE Keeping Children Safe in Education Guidance)
- Teacher Regulation Agency check of qualified Teachers
- QTLS Check (for FE Teachers status)
- Overseas Police check or Letter of Good Conduct
- Qualification check (where applicable)
- Visa expiry and restriction checks (where applicable)
- Enhanced DBS (including barred list check)
- Update Service DBS check
- Face-to-face interview or Zoom call to confirm suitability
- Disclosure of any unspent convictions, cautions and reprimands, warnings of bind-overs which have occurred, including any that would be regarded as 'spent'
- EWC check (Wales only)

## **Pre-Employment Checks for Online Tutors**

At NOW Education, we believe everyone has a responsibility to promote the welfare of all children and young people, to keep them safe and to practise in a way that protects them and are proud that we are able to supply online tutors to Schools as well as LEA's. These online tutors are experienced, qualified teachers who have a background of tutoring in the classroom or a home setting.

NOW Education's Compliance Team run all of the thorough background checks that they would carry out on our School based teaching staff but will also ask for additional references to ensure that the Teacher has experience in one to one tutoring, online preferably.

Prior to an assignment being introduced to the candidate, the consultant will gain as vast amount of information from the client as possible such as the child's individual needs, the curriculum that is to be taught, if the child is under any protective support and how we at NOW Education can accommodate both candidate, client and pupil.

We will ensure that such things are in place such as advising the candidate on the background of their online lesson, ensure they will not have any distractions or background noise. That they are in a secure location, alone with no other persons present. We will also find out such information from the client to inform the candidate prior to the lesson commencing such as who will be present with the pupil during the lesson and where any feedback can be sent post lesson.

## **Booking Confirmations**

For all temporary placements, booking confirmation and vetting forms confirming all completed background checks taken place will be sent to the client prior to the assignment commencing. Safeguarding information is directly merged from our database meaning that all details forwarded to the client is up to date in line with our termly audits and vetting forms updated.

Upon arrival at the client's premises, the candidate will be carrying their photo ID along with their DBS certificate for checking.

## **Maintaining a Safer Culture**

NOW Education internal staff undertake in-house Safer Recruitment training. This only reinforces the understanding of the importance of a strong compliance ethos throughout the business and is backed up by our experienced Compliance Team.

Child protection policies, Behaviour Management Policies, Health and Safety and general expectations of School Staff are all discussed with the candidates during interview and are reiterated once clearance to work has been confirmed.

## Enhanced DBS

NOW Education is a DBS Registered Body. We use the online services of E-Bulk 9 to securely check and submit applications directly to DBS.

We never accept a DBS certificate at face-value, it must be a new application through NOW Education where our Compliance Team will use already vetted documents to submit the application themselves or an Enhanced DBS that is registered to the Update Service and we are able to view, save and verify the DBS certificate itself.

We will require that a candidate is able to evidence the same level of documentation to verify their identity regardless of whether a new DBS is required or not. We will reject applications from any candidate's with a certificate subscribed to the Update Service if they are not able to verify their validity by cross-checking DBS acceptable documentation.

Applicants subscribed to the Update Service have a annual check carried out to confirm they are indeed still registered and their subscription updated. We will request that all candidates who hold a NOW Education DBS apply for a new one every 3 years and may ask that they complete a new application within this time frame to suit a clients expectation. All candidates are advised to carry their DBS certificate with them to and produce this along with photo ID to the start of their assignment with a client.

Where a DBS is not clear, a careful assessment is completed by the Compliance Team and relevant Consultant over whether or not the information will affect the candidates suitability to uptake the post and whether it would be suitable to NOW Education to represent the candidate. Where a DBS holds a result, a discussion is made to ensure the client is fully aware of its content and are happy to accept the candidate on site. If the client requests to see a copy of the DBS certificate, in line with the DBS data handling code of conduct, we ask that the copy be deleted or disposed of securely once the contact has been viewed.

NOW Education take pride in our rigorous Safeguarding checks and thrive on updating our policies in line with any developments. We always recommend a new DBS, or where appropriate, seek to validate an existing DBS if subscribed to the Update Service (available since June 2013) Where an applicant has subscribed to the Update Service, there is no need for employers to insist an applicant makes an application for a new DBS as we are able to validate to accuracy of the certificate using the online service.

For applications registered to the Update Service, all other pre-employment checks are carried out as standard. NOW Education will also then conduct an online check of the application DBS and proceed as below:

| <b>DBS Status Check Results</b>                                                                                                      | <b>Meaning</b>                                                                                                                                                                                            | <b>Explanation</b>                                                                                                                                                                                                                                                  |
|--------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| The DBS certificate did not reveal any information and remains current as no further information has been identified since its issue | This DBS certificate when issued was blank i.e did not have any content about the person and no information has been found since its issue and can therefore be accepted as it is till current and valid. | NOW Education candidates may present a certificate showing a different employer/registered body, but the booking confirmation will advise the DBS has been checked and is clear.                                                                                    |
| The DBS certificate remains current as not further information has been identified since its issue                                   | The DBS certificate revealed information held on the person and no new information has been found since its issue and can therefore be accepted as it is still current and valid.                         | NOW Education candidates may present a certificate showing a different employer/registered body, but the booking confirmation will advise the DBS has been checked as containing information which is fully available to the client as required under DfE guidance. |
| The DBS certificate is no longer current. Please apply for a new DBS check to get the most up-to-date information.                   | New information has come to light since the DBS certificate was issued and you will need to apply for a new DBS to view this content.                                                                     | In this case, candidates will not be cleared to start work through NOW Education until a new DBS application has been processed and the content of the DBS assessed.                                                                                                |

### **Continued Suitability**

Prior to any candidate being deployed on a temporary assignment booking via our database, all pre-employment background checks mentioned must have been completed and thoroughly checked by our Compliance Team. All 'LIVE' candidate file's will undertake a termly internal audit to ensure standards are upkept and that any checks required are completed and noted. We will check and confirm client feedback and repeat any safeguarding checks where appropriate. Such checks may include DBS checks, Update Service checks, QTS/QTLS checks and EWC checks. All are updated and recorded via our database as well as the vetting form which is sent to a client prior to work commencing.

We also ensure that any candidate that does not work for us for 3 months undertake additional checks. If the candidate has continued to work with children during this time we will look to obtain a reference confirming this and cross-reference the dates. If applicable, an Update Service check is also carried out and recorded. Where the candidate has not worked with children during this time period and is not registered to the Update Service, a new DBS application will be required.

### **Misconduct**

Any allegation or concern should in the first instance be reported to the NOW Education Consultant assigned to client /School. All information will be dealt with sensitively and appropriate action taken, including referrals to relevant bodies where necessary. In the event that NOW Education need to consider whether the misconduct should be referred to the local authority the consultant will liaise with Hayley Terrans-Robson (within the Compliance Team) who will record any contact and discussions made. NOW Education will provide full cooperation to schools or Local Authority Designated Officers as appropriate for any investigation concerning a candidate registered with us.

NOW Education is committed to upholding high standards and dedicated to Safeguarding. We pride ourselves on our thorough pre-employment checks, ongoing audits/re-checks, and seeking further feedback from clients to ensure that the staff we provide are of the highest possible standard. Feedback is discussed with the candidate to aid the professional development where appropriate. We would urge clients to share any concerns they have with us so we can address the issues if necessary.

# Recruitment and Selection Policy

NOW Education Ltd is an employment agency and employment business with a focus on providing staffing for schools and childcare settings. We recruit for temporary assignments; Teaching Staff; Learning Support Staff and Support Services Staff. In addition, we recruit a range for permanent positions where the candidate is directly engaged by the end client.

All candidates for temporary assignments must pass a strict set of clearance and vetting criteria before they can be placed for with through NOW Education. All of the roles we recruit for involve significant access to children and therefore an Enhanced DBS Certificate is required for every candidate.

Permanent positions may have different requirements as pre-agreed with the client.

NOW Education is committed to equal opportunities, both as an employer of its own staff and as an agency which recruits and places education staff. We take a pro-active approach to this employment practice. We are opposed to any form of prejudice and make every effort to ensure that it plays no part on our practice.

## Pre-Employment Checks for Temporary Workers

- Childcare Disqualification (where applicable)
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- Reference checks (in line with DfE Keeping Children Safe in Education Guidance)
- Teacher Regulation Agency check of qualified Teachers
- QTLS Check (for FE Teachers status)
- Overseas Police check or Letter of Good Conduct
- Qualification check (where applicable)
- Visa expiry and restriction checks (where applicable)
- Enhanced DBS (including barred list check)
- Update Service DBS check
- Face-to-face interview or Zoom call to confirm suitability
- Disclosure of any unspent convictions, cautions and reprimands, warnings of bind-overs which have occurred, including any that would be regarded as 'spent'
- EWC check (Wales only)

All documentary evidence provided as part of the registration process must be original. Photocopies are not accepted. We may contact previous employers or educational establishments to verify qualifications and other relevant information. For candidates wishing to be assigned to qualified teacher assignments, NOW Education only deems candidates who hold QTS / QTLS for this as confirmed by a QTS / QTLS teacher check. Any discrepancy would need to be handled by the candidate by contacting the relevant authority.

## References

For candidates applying for temporary work NOW Education will contact their previous employers to confirm employment dates, verify experience and qualifications and to take up professional references in line with NOW Education referencing guidance.

Anyone unable to provide relevant references will not be selected for recruitment by NOW Education.

One referee must be the most recent employer. References will not be accepted from relatives or from people writing solely in the capacity of friends. Open testimonials will be verified. Where a verbal reference is taken, this must be confirmed in writing within 15 days, or the candidates registration will be suspended until the reference is confirmed. For permanent placements the client may choose to seek references directly and offer subject to references.

## Registration Interviews

All temporary candidates must attend a face-to-face / Zoom meeting with an NOW Education consultant. The interview will provide an opportunity to assess which kind of placements will best suit the candidates, and to discuss past experience and future opportunities. At this point, original documentation must be provided to verify the candidates identity.

The interview process is where we assess candidate's experience through discussion and must be satisfied that they are a suitable candidate for placement with out clients. Verbal communication skills will also be assessed at this point. For permanent posts, interviews will usually be held by the client at their premises.

## Overseas candidates

For any candidate who has been a resident abroad for 6 months or more within the last 5 years, NOW Education require an overseas police or letter of good conduct (if applicable) for every country the candidate has resided in. The overseas police check will need to be officially translated where applicable. If this document is not available to the point of registration, subject to all other checks being completed, and provided we have evidence that the candidate is endeavouring to obtain the relevant overseas police check, we will clear the candidate for work pending the overseas check. Any relevant information that comes to light after the candidate starting work will be dealt with appropriately and shared with the end employers as necessary.

Candidates wishing to register using qualifications gained overseas may be required to gain evidence from NARIC to confirm the equivalency for the qualifications. NARIC is the official body giving assessments on behalf of the UK Government, proving the only official source of information on international qualifications to organisations recruitment from overseas and to individuals wishing to work or study in rh UK.

Overseas candidates wishing to register as qualified teachers, should contact the DfE to enquire whether they can be recognised as holding QTS. Qualified Teachers within the EU are usually awarded UK QTS, as are teachers from USA, Canada, Australia and New Zealand.

### **Continued Suitability**

NOW Education's responsibility for Safeguarding children is an ongoing duty we pride ourselves on continually monitoring the temporary staff we Supply to Schools. This includes re-checking the prohibition list, QTS/QTLS status, checking DBS' where applicable as well as the Update Service. We also monitor candidates throughout the academic year to ensure that and 3 months employment gaps away from NOW Education are investigated. The DBS is deemed invalid if the candidate has a 3 month gap away from working with children and should this occur and they are not subscribed to the update service, a new DBS is required. We pride ourselves on obtaining feedback from clients and discussing the with candidates where appropriate to aid in their professional development. The opportunity for feedback is given to every booking confirmation form which they are sent.

Our database records expiry dates against a candidate's record to ensure they do not continue to be placed without appropriate or additional checks being made and updated. Any checks that are due are flagged to the Compliance Team prior to expiry date allowing them to keep records updated and any checks that are due are done in sufficient time with database then being updated.

### **Health Declaration**

The Education (Health Standards) (England) Regulations 2003 require us to check that staff who will be working directly with children have the health capacity to do so. All candidates are required to answer a health declaration questions and give further information where relevant. Where deemed necessary, candidates may be asked to provide a letter from their GP confirming they are fit for work.

### **Complaints**

NOW Education has a formal complaints policy available to request

### **Termination/De-Registration/Misconduct**

NOW Education reserves the right to select candidates that we feel able to provide a positive service and who we feel will best represent NOW Education when working with our clients.

We may choose not to register a candidate for reasons including but not limited to, being unable to provide satisfactory and relevant references or we may choose to cease working with candidate who receives unsatisfactory feedback from clients.

NOW Education is committed to its duty or referral to the DBS where appropriate. Any reported allegation or concern will be investigated and reported to the relevant bodies as necessary. Please see below this internal process:



# Allegation/Safeguarding concern reporting process

Any allegation or safeguarding concern reported to Now Education is acted on immediately and a thorough investigation is undertaken to ensure that both our candidate and client is confident that the issue is being looked into sensitively and professionally. Please see below order in which steps are taken to protect and record information provided.

## Step 1:

This is, in most cases when a School or Client makes initial contact with their Consultant to make them aware of an allegation or concern that is brought to their attention concerning our member of staff. This may also be brought to the attention of NOW Education through another source such as a colleague of the candidate. At this point, the Consultant will obtain as vast amount as information as possible but keeping in mind that in many cases, the initial contact may be of limited information as more will come to light as an investigation, if needed, progresses. All information taken is thoroughly recorded against the candidates file on our database. If required, the candidate will be made aware that an allegation has been brought against them and we advise they do not uptake any assignments through ourselves or any other agency working with Schools to safeguard themselves until further advice is available.

## Step 2:

The Consultant will then pass any details they have obtained onto Hayley Terrans-Robson who will oversee our actions taken during any investigation that commences and will also record all information gained internally. Hayley will also look to liaise with the Local Authority Designated Officer where applicable and will again, record any discussions or correspondence made.

## Step 3:

If the allegation has indeed been passed to the LADO and a full investigation is required, both Hayley Terrans-Robson and relevant Director will attend any meetings or online referrals to represent NOW Education and pass on any relevant checks and information we have obtained in the time we have employed the candidate. Again, all developments will be noted and the relevant Consultant fully aware of any developments should discussions with the client continue. We will write to the candidate re-iterating that they must suspend any work alongside children during the investigation. We will also refer the candidate's allegation to the DBS as well EWC (if a Wales based candidate)

If the allegation or concern is not referred and does not warrant a full investigation concerning the LADO, NOW Education will look to carry out their own investigation into the matter. If the concern is proven to be unevicenced, we will provide the candidate with the details to renew any safeguarding qualification and will run additional compliance checks to update and replenish their file with all noted.

## Step 4:

Based on the outcome of any investigation concerning the LADO, NOW Education will look thoroughly look again into whether we feel we are able to represent the candidate as their employer and if we feel confident in their ability to work within a School / Childcare setting. If so, as stated above, all compliance checks will be re-done and full details noted against the file.

If their result of the investigation reflects badly on the candidate, we will cease working with them and will update any concerns to the DBS and EWC (where applicable)