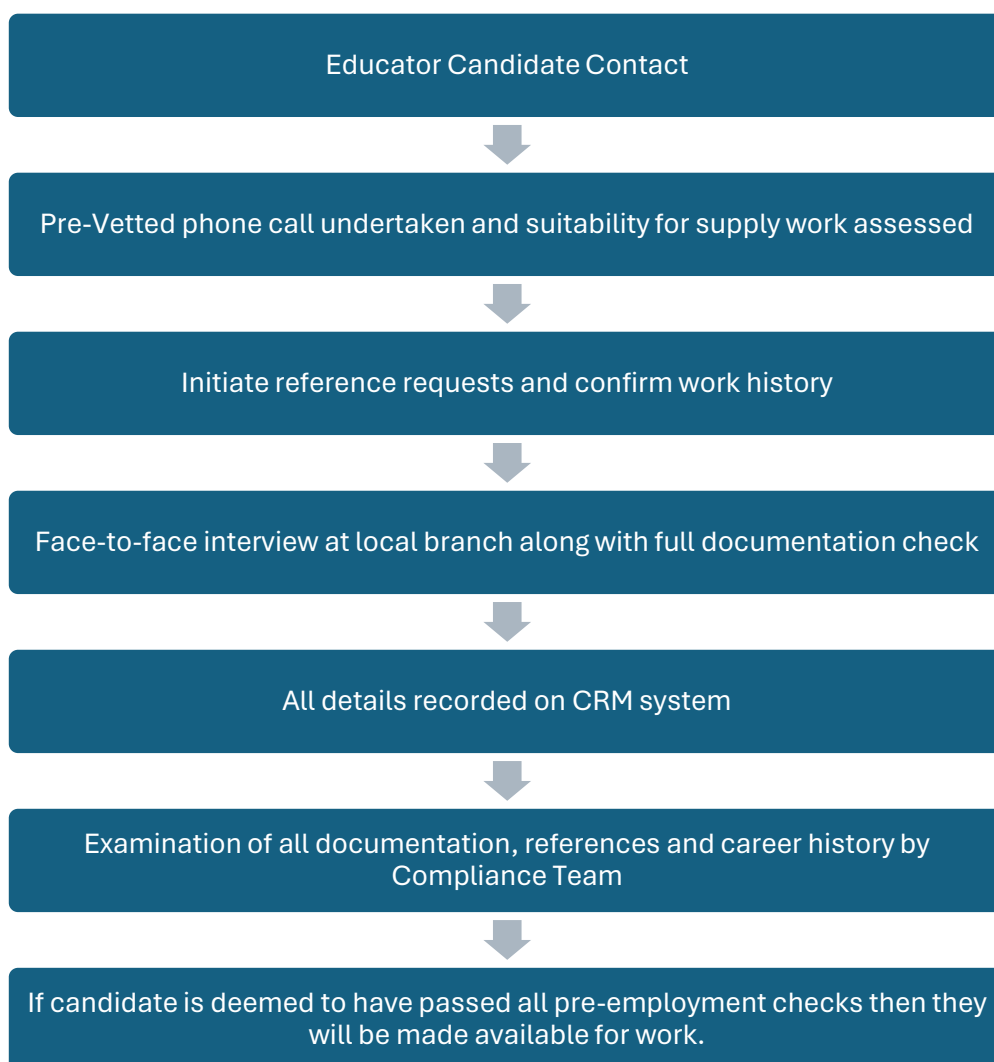
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## Recruitment Process

We at Integra Education believe that the quality of our supply staff is one of the most important factors in our work with customer and educational establishments. Integra Education currently supply a range of staff to clients including tutors, teachers, instructors, cover supervisors, learning support assistants, classroom assistants and nursery nurses.

We comply with the requirements of the DfE guidance entitled ‘Keeping Children Safe in Education’ in addition to the stringent requirements of the REC.

Our recruitment process is outlined below. Initially all educators are pre-vetted via a detailed telephone interview and if deemed suitable are then invited to attend a face-to-face interview in the local branch. Original documents is supplied at interview and all educators are questioned on their relevant classroom skills and experience.



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## **Pre-Employment Checks**

As part of our recruitment process all Integra Education agency supply staff undertake the following pre-employment checks:

### **Interview**

We carry out a detailed interview before supplying educators or support staff to a customer. Interviews are conducted by our consultants according to strict standardised guidelines to ensure equality of opportunity and comparability of information about each of our educators.

Our registration form captures key stage abilities, teaching / childcare experience, personal details, SEN experience and specialities, qualification details, referees, medical history and records any gaps in employment history.

### **Criminal background check**

We ensure that all educators hold a valid DBS Enhanced Disclosure for the correct Workforce, preferably the DBS will also be Update Service Registered.

Integra Education use the DBS online system (U-check/ Atlas) to process our DBS checks which minimises errors and ensures a very efficient turnaround time on new checks (over 40% returned within 24 hours).

Enhanced DBS checks or Update Service Status checks are conducted every 12 months on all active staff (without a break in service) and after any gap in service from education employment for 3 months or more.

All educators with any information showing on their Enhanced DBS check are reviewed prior to starting work by the Recruitment and Compliance Team. Integra Education share information noted on an Educator's disclosure certificate with clients, as required by the DBS and KCSIE.

Educators who have lived overseas for a period of 6 months or more in the last five years, must provide a valid criminal clearance check from their originating country in addition to an Enhanced DBS check.

If the Educator has taught abroad or qualified as a teacher abroad, they will be required to produce a Letter of Professional Standing from the regulating authority in the country (or countries) in which the educator has worked/qualified.

Checks against the Children's barred list (list 99) is made for every educator prior to starting work, this forms part of the Enhanced DBS.

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### **Qualification check**

All educators are required to provide original proof of their qualifications. In the absence of original certificates, we gain a letter confirming qualifications from the DfE / EWC / the Teaching Regulation Agency or the individual's training provider.

All teachers are required to hold a teaching qualification and proof of Induction where relevant. Early Careers Teachers / Newly Qualified Teachers are given appropriate advice and guidance on completing their induction.

Overseas trained educators are required to hold a teaching qualification that is comparable to British bachelor's degree standard (assessed via ECCTIS, formerly UK NARIC). Overseas educators are also made aware of the assessment process to gain UK QTS where relevant.

All Nursery Nurses must hold an appropriate nursery nurse qualification.

Where appropriate, TRA (previously NCTL) Teacher prohibition and Induction checks will take place. Copies of qualifications are made available to client schools when requested.

All educators are required to have Children's Safeguarding Training completed within the last 12 months and are given a link to KCSIE which they will need to confirm they have read before commencing work. This is inclusive of KCSIE updates, which we send out and require confirmation of receipt, reading and understanding. We also offer free Prevent Duty training which we encourage all our educators to complete, however Prevent duty training is compulsory for all educators carrying out tuition.

### **Identity check**


We verify the identity of each new applicant against official documents such as a passport or birth certificate and proof of address. We are aware of the potential for individuals changing their name and will check the name on their birth certificate, where this is available.

### **Reference checks**

We request the two most recent professional educational/employment references for teachers and experienced teaching assistants and our vetting requirements are that a total of 24 months of references are gained. We do not accept open references or testimonials and circumstances surrounding any agreed references must be fully investigated where possible before a decision to recruit will be made.

References must be based on educational or childcare positions of employment where applicable/possible; if not the most relevant professional employment references should be sought from a suitable line manager.

Trainee Teaching Assistants can begin work with two appropriate character references if we deem they have the attitude, characteristics and skills to work in schools.

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All teaching educators must have recent classroom experience within the last 6 years and are required to provide full, detailed career history on their CV.

References are requested directly from an employer using the Integra Education reference request form. Each form has an educator photograph attached for identity verification purposes.

### **Health checks**

A health declaration is completed and signed by the educator at interview to verify the candidate's mental and physical fitness to carry out their work responsibilities. Where any information is identified, further clarification will be sought from the educator and a relevant medical professional if applicable.

### **Permission to work in the UK**

All educators must provide proof that they have legal permission to work in the UK in line with Home Office guidance. This can be provided through the production of a valid national insurance number and a relevant immigration document such as a passport or valid visa document. These checks are repeated on an annual basis in line with Home Office requirements. Educators who have lived overseas for a period of 6 months or more in the last five years, must provide a valid criminal clearance check from their originating country in addition to an Enhanced DBS check.

If the Educator has taught abroad or qualified as a teacher abroad, they will be required to produce a Letter of Professional Standing from the regulating authority in the country (or countries) in which the educator has worked/qualified.

### **Childcare Disqualification Checks**

All educators working with children under the age of 8 are required to complete a Childcare Disqualification Declaration to ensure that they are not disqualified from doing so under the Childcare (Disqualification) Regulations.

### **Online Searches**

Preliminary online searches will be carried out on all educators prior to onboarding to help identify any incidents or issues publicly available online that may need to be explored further during the interview process. Educators are informed that these searches may be carried out.

### **Record Maintenance**

All vetting information is processed in our Recruitment and Compliance team. The team is made up of staff members who are solely responsible for managing all vetting information and recruitment decisions. The team are all trained in Safer Recruitment. Copies of documentation are uploaded directly onto our system by branches following a educator interview. The recruitment and compliance team review the documentation and log it against each individual

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educator file. Internal databases are password protected and only members of the education team have access to edit and update vetting documentation. The systems are also backed up to a number of different secure locations on a daily basis in line with GDPR requirements.

### **Appraisal and Performance Management**

All educators have daily feedback taken from client schools on their performance during the day – these are called Tutor Feedback form, The feedback forms we take from customers play a significant part in helping us to monitor the performance of all our supply staff. Where particular weaknesses are identified by customers we can make immediate referrals for further training and where appropriate arrange more detailed assessments. In extreme cases, this may lead to supply contract termination.

All feedback is communicated to all educators and is recorded on their personal file.

**The following document outlines Integra Education’s procedures for managing allegations made against agency workers.**

### **General Principles**

The following general principles will apply:

- Each step and action will be taken without unreasonable delay.
- Integra Education may suspend agency workers without pay while an investigation takes place. Such a suspension will be reviewed as soon as possible and will not normally exceed 20 working days
- If a review meeting is required, the agency worker will have the right to be accompanied by a trade union representative or a work colleague of their choice. If an agency worker is unable to attend any such meeting, an alternative meeting date may be suggested, provided it is within 5 working days of the original date.
- Timing and location of meetings must be reasonable.
- If a meeting is needed it will be conducted in a manner that enables both Integra Education and the agency worker to explain their case.
- Whenever Integra Education or the agency worker is required to send the other a statement, the original or a copy will suffice.
- No action will be taken against an agency worker until the case has been fully investigated
- An agency worker’s contract or services will not be terminated for a first offence except in the case of gross misconduct.
- It should be recognised that lists of offences cannot be regarded as complete to meet every case, and also that action described as general misconduct may amount to and be treated as gross misconduct if the circumstances or the manner of the misconduct are such as to warrant

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serious action. These lists should be regarded therefore as being illustrative rather than exhaustive.

- All records of action taken will be held centrally by the Safeguarding Team and a record of the action will be held on the agency worker’s file.
- Integra Education will follow the Keeping Children Safe in Education guidance (part 4) in relation to allegations against supply staff. We will work closely with the Hirer, LADO, police and/or children social services where necessary.

**Procedures**

The steps set out below are a guide and will not be followed in full in every case. The point at which the procedure is entered or the omission of any of the stages will depend entirely on the seriousness of the offence. Thus, a series of minor offences or a repetition of one such offence may involve the entire procedure whilst a more serious offence may well call for a final warning. Gross misconduct will lead to instant termination of a contract.

**Offences other than gross misconduct**

The following are examples of offences other than gross misconduct for which contract termination may be appropriate if corrective action is not taken after the issue of a written warning:-

- Unauthorised absence: including unauthorised absenteeism or unauthorised absence from the work place.
- Poor standard of work; or inadequate attention to work.
- Poor timekeeping or attendance
- Provocative, abusive or truculent behaviour
- Inappropriate language or phrases
- Sexist or racist conduct or behaviour of any kind.

The procedures for dealing with offences other than gross misconduct are:

**Formal Review –**

A Formal Review will take place in the light of any allegation. This review may involve taking written statements from relevant parties or a formal review meeting or both. Written notice of meetings will be given in all cases and agency workers are entitled to suggest an alternative date where relevant within 5 working days of the original meeting date.

**Verbal Warning –**

(For Minor Offences) In the case of minor offences the agency worker will be given a formal verbal warning.

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**First Written Warning –**

(For Repeated Minor Offences or a More Serious Offence) If a more serious offence occurs or another minor offence occurs after the issue of a formal verbal warning the agency worker will be given a first written warning.

**Final Written Warning –**

(For Repeated Minor Offences and Very Serious Offences) If another offence occurs after the issue of a first written warning or if there is an action which the Company considers is a very serious offence a final written warning will be given to the agency worker.

**Dismissal –**

Is regarded as the ultimate step and in cases other than gross misconduct will take place where the agency worker on a former occasion has been issued with a final written warning in respect of a similar matter or other cause of complaint.

Where a decision to dismiss has been taken the agency worker will be informed that he/she will receive a formal written notice of this decision, together with a clear statement of the reasons for dismissal.

**Suspension**

At each stage the Company reserves the right to suspend the agency worker without pay whilst an investigation is ongoing. In all cases we will endeavour to work within DfE guidelines on timescales.

Suspension will apply where:

- The actions complained of require the immediate removal of the agency worker from their place of work pending a decision concerning any action to be taken.
- The action complained of/alleged requires investigation and it is considered by the Company that it is undesirable for the agency worker to remain on duty.

**Offences involving gross misconduct**

The Company will terminate the contract of any agency worker considered to be guilty of gross misconduct.

The following are examples of actions which constitute gross misconduct:-

- Theft, either from the Company, its employees, clients, assigned schools or agents, including the unauthorised possession of any of the Company's goods, materials, products or produce.
- Fraud: any deliberate falsification of records or any deliberate attempt to defraud the Company or fellow employees. Fraud can include falsification of time sheets, travel claims, self-certification forms, registration documentation, career history etc.

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- Unauthorised use or disclosure of confidential information or business matters relating to the company, its clients, temporary workers or applicants.
- Violence: any fighting or violence involving any fellow employee or any other person which takes place on the Company's premises or whilst at an assigned school.
- Indecency which is related to employment with the Company.
- Deliberate damage to Company's property, or to the property of fellow employees or to the property of an assigned school.
- Intoxication on the Company's premises or the bringing of intoxicants or illegal drugs onto the Company's premises at any time or onto the premises of an assigned school.
- Gross carelessness or negligence: including any action or failure to act which threatens the health or safety of any fellow employee or school, pupil or teacher including any disregard of safety rules which jeopardises the safety of those on the Company's premises or the premises of an assigned school.
- Failure to comply with the provisions of the Company's Safety Policy or that of an assigned school.
- Any conduct which does or may bring the Company's business into disrepute or which results in the loss of custom of a client, temporary or applicant or a loss of business.
- Breach of contract of employment: any fundamental breach of contract which renders continuation of employment impossible including failure to meet statute related provisions.
- Harassment of other members of staff or of others, whether the harassment is sexual, racial or of any other kind.
- Discrimination against other members of staff, applicants for employment or others which is on grounds of sex, marital status, race, colour, religion, ethnic origin, nationality or disability.
- Obtaining unauthorised access to, making unauthorised use of or making unauthorised amendments to information stored on computers, computer software or computer hardware.
- Inappropriate social, physical or sexual contact with school staff, pupils or Integra Education employees.
- Refusal to carry out reasonable instructions from a superior.
- Failure to inform Integra Education of any relevant disciplinary matters arising from alternative employment that may be relevant to our assessment of your suitability to work.
- A criminal offence committed at work other than a minor road traffic offence committed in the course of the employment, or an offence committed outside work which is incompatible with the employee remaining in employment.



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- Refusal to obey a lawful instruction in connection with the employment.
- Disclosing details of his/her salary and remuneration to other agency workers of the company.

### **Concerns or Allegations that may meet the Harm Threshold**

This is about managing cases of concerns/allegations that might indicate a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in a school or college. This should be followed where it is alleged that anyone working in the school or a college that provides education for persons under 18 years of age, including supply teachers, volunteers and contractors has:

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

The last bullet point above includes behaviour that may have happened outside of school or college, that might make an individual unsuitable to work with children, this is known as transferable risk.

Where appropriate, an assessment of transferable risk to children with whom the person works should be undertaken. If in doubt the school/college should seek advice from the local authority designated officer (LADO).

If schools and colleges are in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, they should consult with their LADO.

Where the school/college/Educator identifies that a child has been harmed, that there may be an immediate risk of harm to a child, or if the situation is an emergency, they should contact local authority children’s social care and as appropriate the police.

### **Concerns regarding other members of staff**

If the agency worker has any safeguarding/other concerns regarding another member of staff, they should speak directly to the Designated Safeguarding Lead.

### **Appeals**

The agency worker has the right to appeal against any action taken against him/her. The wish to appeal should be notified in writing to the Compliance Manager and the appeal should be made in writing within 2 weeks. Unless the appeal is made within five days of the review, it will be assumed that the agency worker accepts the action taken.

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### **Referral to Relevant Authorities**

Misconduct (not Child and Vulnerable Adult Protection related) / Incompetence Cases where Integra Education have ceased to use the services of an agency worker or might have ceased to use those services had the educator not ceased to provide them for misconduct or incompetence reasons the matter will be referred to the Teaching Agency (NCTL).

### **Safeguarding**

Cases where Integra Education have ceased to use the services of an agency worker or might have ceased to use those services had the agency worker not ceased to provide them, for reasons of a safeguarding nature, will be referred to the Disclosure and Barring Service.

Referrals will be made by the Safeguarding Team, DSL or Managing Director.

### **Review**

The Compliance Manager will keep Integra Education’s procedures for managing allegations under annual review and/or if there have been any relevant legislative changes.

### **Recruitment and Selection Policy**

Integra Education recruit a wide range of educational teaching and support staff to work in schools across England.

Our recruitment policy complies with the statutory guidance ‘Keeping Children Safe in Education’ as well as other relevant supporting legislation and guidance. The company also follows the REC Code of Practice for the education recruitment sector.

Integra Education place adverts for vacancies with the guidance of schools and organisations.


These include details of the skills, experience, qualifications and behaviours required for the role. All adverts are posted with the information below:

All applicants will require the appropriate qualifications and training for this role

Integra Education is committed to safeguarding and promoting the welfare of children. We undertake safeguarding checks on all workers in accordance with DfE statutory guidance ‘Keeping Children Safe in Education’ this may also include an online search as part of our due diligence on shortlisted applicants.

We offer all our registered candidates FREE child protection and prevent duty training. All candidates must undertake or have undertaken a valid enhanced Disclosure and Barring Service (DBS) check. Full assistance provided.

It is at this point the applicants will be shortlisted by Integra Education and an initial call will take place to assess the applicant’s suitability for the role/other suitable roles we may have available.

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Once the call has taken place, the applicant will either be given feedback on why we will not be inviting them for a registration interview at this stage or invited to the next stage of the process when the following checks are conducted:

### **Interview**

A detailed interview is conducted on all educators. Interviews are conducted face-to-face by our consultants according to strict standardised guidelines to ensure equality of opportunity and comparability of information about each of our educators.

Questions raised include:

- Finding out what attracted the candidate to the post being applied for and their motivation for working with children
- Exploring their skills and asking for examples of experience of working with children which are relevant to the role, and
- Probing any gaps in employment or where the candidate has changed employment or location frequently, asking about the reasons for this.
- Specific safeguarding questions e.g. A safeguarding scenario and asking how they would act upon it and the steps they would take and why.

### **Criminal background check**

We ensure that an Enhanced DBS Disclosure check or DBS Update Service check is completed through the Disclosure and Barring Service for all educators undertaking regulated activity with children.

Where relevant, this check will be completed through Integra Education directly.

Educators with Child and Adult Enhanced DBS checks or equivalent registration with the Update Service will only be accepted if the educator is undertaking pre-agreed regulated activity placements with adults.

Annual status checks are conducted for all educators registered with the DBS Update Service.

Those not registered with the Update Service will be required to undertake an annual new Enhanced DBS check through Integra Education.

Children's Barred List checks are completed as part of the enhanced DBS check at the educator's registration phase. The Childrens Barred list is checked again every 3\* to 12 months by means of an

Update Service check. If an educator is not registered with the Update Service, a new Enhanced DBS check would be required.

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\*If an Educator has a 3 month gap working with children then an Update Service check or new Enhanced DBS application would be required.

All educators sign a Rehabilitation of Offenders Act Statement.

Educators who have lived outside the UK for periods of 6 months or more in the last 5 years are also required to provide us with criminal clearance from any relevant country.

If the Educator has taught abroad or qualified as a teacher abroad, they will be required to produce a Letter of Professional Standing from the regulating authority in the country (or countries) in which the educator has worked/qualified.

All educators working with children under eight are required to complete a Childcare Disqualification Declaration form as part of the registration process. Educators with any relevant offences will not be permitted to register to work with children under eight unless there are in possession of an Ofsted Waiver.


Integra Education share information noted on an Educator's disclosure certificate with clients, as required by the DBS and KCSIE.

Integra Education complete an online search as part of our due diligence on agency workers. This may help identify and incidents or issues that have happened, and are publicly available online, which we may want to explore further with the educator.

### **Reference checks**

We request references from all employers in the last 2 years, the total references must amount to 24 months. These references are taken directly from the referee and are gained in writing. We also complete an Education to date employment history for all educators and all career gaps must be fully explained. All educators must provide a CV which provides a full career history. All educators must provide a CV which provides a full career history. Integra Education will:

- not accept open references e.g. to whom it may concern
- not rely on applicants to obtain their reference
- ensure any references are from the educator's current employer and have been completed by a senior person with appropriate authority (if the referee is school or college based, the reference should be confirmed by the headteacher/principal as accurate in respect of any disciplinary investigations)
- obtain verification of the individual's most recent relevant period of employment where the applicant is not currently employed
- secure a reference from the relevant employer from the last time the applicant worked with children (if not currently working with children), if the applicant has never worked with children, then ensure a reference from their current employer
- Always verify any information with the person who provided the reference
- Ensure electronic references originate from a legitimate source

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- Contact referees to clarify content where information is vague or insufficient information is provided
- Compare the information on the CV and registration form with that in the reference and take up any discrepancies with the educator
- Establish the reason for the educator leaving their current or most recent post, and,
- Ensure any concerns are resolved satisfactorily before appointment is confirmed.

### **Identity check**

We verify the identity of each educator against official documents identified in the approved Group 1 DBS identity documents (such as passport, UK Birth certificate issued within 12 months of date of birth or UK Driving Licence). We are aware of the potential for individuals changing their name and will check the name on their birth certificate, where this is available. In addition referees are asked to confirm the identity of the educator shown on a photograph (taken during registration) when a reference request is sent.

### **Permission to work in the UK check**

All educators must provide proof that they have legal permission to work in the UK via an original in date passport or other acceptable proofs as outlined the Home Office document 'An employer's guide to right to work checks'. <https://www.gov.uk/government/publications/right-to-workchecks-employers-guide>

### **Qualification**

As part of the registration process, we require sight a copy of the teaching qualification certificates. All UK teaching qualifications are verified via the Teaching Regulation Agency (TRA).

Checks are made on all staff carrying out teaching work to ascertain if any prohibition orders or sanctions are in place.

### **Health check**

A medical declaration is completed and signed by the educator to verify the candidate's mental and physical fitness to carry out their work.

### **Policy review**

The Compliance Manager will keep Integra Education's Recruitment Policy under annual review and/or if there have been any relevant legislative changes.

## **Recruitment of Ex Offenders Policy**

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## Introduction

Integra Education is committed to the fair treatment of its staff, potential staff or users of its services, regardless of race, gender, religion, sexual orientation, responsibilities for dependents, age, physical/mental disability or offending background.

Integra Education undertakes not to discriminate unfairly against any subject of a criminal record check on the basis of a conviction or other information revealed.

Integra Education actively promotes equality of opportunity for all with the right mix of talent, skills and potential and welcome applications from a wide range of educators, including those with criminal records.

## Protected Offences

Where a DBS certificate at either standard or enhanced level can legally be requested (one that is included in the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (2013 and 2020), and where appropriate Police Act Regulations, as amended), Integra Education can only ask an individual to provide details of convictions and cautions that we are legally entitled to know about (excluding youth cautions, reprimands or warnings) and not protected.

The amendments to the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (2013 and 2020) provides that when applying for certain jobs and activities, certain convictions and cautions are considered 'protected'. Individuals are not required to provide any information about protected (filtered) offences. This means that they do not need to be disclosed to employers, and if they are disclosed, employers cannot take them into account.

## Recruitment Process

Integra Education select all educators for interview based on their skills, qualifications and experience.

For those positions where a criminal record check is identified as necessary, all job adverts and registration forms will contain a statement that a DBS certificate will be required in the event of the individual registering with the employment business.

Integra Education will make the policy on the recruitment of ex-offenders and the relevant Code of Practice, available to all DBS applicants at the start of the recruitment process.

Integra Education ensures that all those who are involved in the recruitment process have been suitably trained to identify and assess the relevance and circumstances of offences and the relevant legislation relating to the employment of ex-offenders, e.g. the Rehabilitation of Offenders Act 1974 (2013 and 2020).

Integra Education undertakes to discuss any matter revealed on a DBS certificate with the individual. At interview, or in a separate discussion, we ensure that an open and measured

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discussion takes place on the subject of any offences or other matter that might be relevant to the position. Failure to reveal information that is directly relevant to the position sought, could lead to withdrawal of registration or engagement.

Integra Education share information noted on an Educator’s disclosure certificate with clients, as required by the DBS and KCSIE.

**Code of Practice**

As an organisation assessing applicants’ suitability for positions which are included in the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (2013 and 2020) using the Disclosure and Barring Service (DBS), Integra Education complies fully with the code of practice. This can be found at the following website: [www.gov.uk/government/publications/dbs-code-of-practice](http://www.gov.uk/government/publications/dbs-code-of-practice)

**Referrals**

Cases where Integra Education have ceased to use the services of an educator or might have ceased to use those services had the educator not ceased to provide them, due to information contained on their DBS will be referred to the Disclosure and Barring Service and/or the Welsh Assembly Government within one month of ceasing to use their services.

**Policy review**

The Compliance Manager will keep Integra Education’s Recruitment of Ex-Offenders Policy under annual review and/or if there have been any relevant legislative changes.