

## Recruitment, Selection and Vetting Policy

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Step Teachers is a specialist education recruitment agency and business providing teaching and support workers to client schools for long term, short term, day to say supply and permanent placements. The safety and welfare of children is always considered, and it is our policy to ensure that all relevant pre-registration checks are carried out by staff that are trained in procedure and understand their responsibilities.

We are committed to equal opportunities for all, in our recruitment practices and oppose all forms of unlawful or unfair discrimination, direct or indirect, irrespective of age, ethnic origin, sexual orientation, religious beliefs, disability, gender, gender reassignment, marital and civil partnerships, responsible for dependents, trade union membership or any other circumstances not relevant to the performance of a position.

Our vetting procedures are designed to surpass the requirements placed on us by the Department for Education's Keeping Children Safe in Education 2024 statutory guidance. We are members of the Recruitment and Employment Confederation (REC) and adhere to their 'Code of Professional Practice'. We have held REC Audited Education accreditation since 2012 which replaced the DfE Quality Mark which we held since 2005. The REC Audited Education status verifies that our policies and procedures are in accordance with the Conduct of Employment Agencies and Employment Businesses Regulations 2003 and all safeguarding legislation.

All checks are completed prior to the first placement of a candidate and are repeated during service on a continuous basis to ensure suitability to work with children. All mention of 'candidate' in this policy includes teacher, support worker and tutor unless otherwise stated.

The following checks and training apply to all candidates who register with Step Teachers:

- Face to face interview
- Full cv
- Right to work checks
- ID check and proof of address
- References
- Signed Rehabilitation of Offenders Act Declaration
- Disclosure and Barring Service and Update Service checks
- Overseas police checks
- Letter of Professional Standing
- Qualifications
- Teaching Regulation Agency (TRA) check
- Signed Health Declaration
- Signed Childcare Disqualification Declaration
- Online Search
- Proficiency of the English Language Assessment
- Read and sign 'Keeping Children Safe in Education' Part 1
- Child Protection Training
- Prevent Duty Training
- GDPR Training

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### Face to Face Interview

Before placing a candidate on assignment, Step Teachers meets with the candidate face to face or via a live video call. Before meeting the candidate, we ask them to forward a copy of their cv and advise them of the documentation they are required to forward to us or to bring with them to the interview.

During the interview, a trained Resource Consultant will assess the candidate's suitability for the role by discussing their previous work history and qualifications. Step Teachers uses a template of standard relevant questions to ensure equality of approach and seek to understand the candidate's knowledge and understanding of protocols and to assess how they would react to various scenarios.

Provided the outcome of the interview is satisfactory, Step Teachers will then start the pre-employment checks.

### CV

All candidates must provide us with a cv that details the last 10 years of employment and education history (if applicable). Dates of employment and education must include the start and end date as well as the month and year of their previous and current employment and education.

This is to ensure that any gaps in employment are clearly identified. Any gaps of 3 months or more are discussed with the candidate and recorded on the candidate's electronic file. The information provided on the cv is crossed checked with the information provided on the candidate's application form, qualifications, and ID documents. Any discrepancies are discussed with the candidate.

### Right to Work Checks

Step Teachers conducts right to work checks on every candidate we intend to supply to our clients to comply with immigration requirements, recruitment industry legislation and to ensure that we guard against the risk of supplying a person who is not permitted to work, to a client. All checks are carried out in line with best practice and equality laws.

We will conduct a **manual document check**, a **digital identity verification check through an Identity Service Provide (IDSP)** or an **online check using the Home Office Online or Employers Checking Service** to establish a candidate's right to work. Where a right to work check is conducted using the online service, the information is provided in real time, directly from Home Office systems and so there will be no requirement to see the documents list below.

#### *Manual right to work checks*

For physical document checks we follow the three-step process set out in the [Home Office Guidance: An Employer's guide to right to work checks](#):

- **Step one:**

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We obtain the candidates original documents. The candidate must provide us with either one document (or a combination of documents where applicable) from [LIST A](#) of the Home Office right to work checklist or any of the documents or combination of documents from [LIST B](#) of the checklist. We only accept original documents. Photocopies or electronic scans are not acceptable, and we must be in receipt of the physical documents.

- **Step two:**

We take reasonable steps to check that the document is genuine, and that the candidate is the person named in the document.

For each document we complete the following checks:

- Check any photographs are consistent with the appearance of the candidate.
- Check any dates of birth listed are consistent across documents and that we are satisfied that these correspond with the appearance of the candidate.
- Check that the expiry date for permission to be in the UK has not passed.
- Check that the documents are valid and genuine, have not been tampered with and belong to the holder; and
- If given two documents which have different names, we ask for a further document to explain the reason for this. This further document could be a marriage certificate, divorce decree absolute, a deed poll or statutory declaration.
- Check that in relation to restrictions on permission to work in the UK the candidate is allowed to do the type of work they have applied for. For students, we will obtain a copy of their academic term times from the relevant institution.

- **Step three**

We make a copy of the relevant page/s of the document in a format which cannot be subsequently altered. This can include a photocopy or a scan in a non-rewritable format.

Where the candidate has provided us with a passport, we will photocopy or scan the following: any page with the document expiry date, the holder's nationality, date of birth, signature, leave expiry date, biometric details, photograph, and any page containing information indicating that the holder has an entitlement to enter or remain in the UK and undertake the work in question.

For all other documents, we make a clear copy or scan of the document in full.

All copies of documents taken will be kept securely for the duration of the candidate's engagement with Step Teacher and for two years afterwards. They copy will then be securely destroyed.

We will make a note of the date on which the check was conducted by either a declaration on the hardcopy or on a separate record.

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### ***Digital identity verification checks***

For digital document checks we follow the three-step process set out in the [Home Office Guidance: An Employer's guide to right to work checks](#):

- **Step one:**

We will use the service of an Identification Service Provider (IDSP) who can satisfy a minimum of a Medium Level of Confidence check.

- **Step two:**

Once we have received the output from the IDSP confirming details of the check, we will satisfy ourselves that both the photograph and biographic details of the candidate such as their date of birth, are consistent with the person presenting themselves to us for work finding services. We may conduct this check via a video call or in person.

- **Step three:**

All copies of the output forms will be kept securely for the duration of the candidate's engagement with Step Teachers and for two years afterwards. The copy will then be securely destroyed.

### ***Online right to work checks***

For online right to work checks we follow the three basic steps set out in the [Home Office Guidance: An Employer's guide to right to work checks](#):

- **Step one:**

Where the candidate provides us with a valid share code we will use the Home Office online right to work checking service and will only supply the person if the online check confirms they are entitled to do the work in question:

- **Step two:**

We satisfy ourselves that any photograph on the online right to work check is of the candidate presenting themselves for work; and

- **Step three:**

We retain a clear copy of the profile page provided by the online right to work check (storing that response securely, electronically or in hardcopy) for the duration of the candidate's engagement with Step Teachers and for two years afterwards. The copy will then be securely destroyed.

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### ***Employers checking service checks***

If we are unable to conduct an online check because:

- We have not been provided with any acceptable documents listed in List A or B of the guidance and we have been unable to obtain an online check via share code.
- We have been provided with a non-digital Certificate of Application (CoA), email or acknowledgement letter confirmation an application for the EU Settlement Scheme (EUSS) was made on or before 30 June 2021.
- We have been provided with evidence that the worker is a long-term resident of the UK who arrived before 1988 but have not received documents in List A or B.
- We have been provided with a non-digital CoA confirming an application for the EUSS was made on or after 01 July 2021.
- We have not been provided with any acceptable documents but have been given information that indicates an application for permission to stay was made to the Home Office prior to the expiry of the workers previous permission or there is an appeal or administrative review pending.
- We have been provided with a valid Application Registration Card.

In these circumstances we will use the Home Office's employers checking service and await receipt of a positive verification notice before supplying the candidate to a client.

### **ID Checks and proof of address**

In addition to the above right to work documents, we also require the candidate to provide us with two original documents, one to confirm their identity and one to confirm their address. The type of documents that we accept are a valid driving licence, passport, utility bill, bank statement, government document/letter which includes the candidate's national insurance number.

Copies of documents will be taken and noted with the date the documents were checked. Copies will be kept securely for the duration of the candidate's engagement with Step Teachers and for at least 1 year after. The copy will then be securely destroyed.

### **References**

In accordance with Regulation 22 of the Conduct of Employment Agencies and Employment Businesses Regulations 2003 (and the terms of the Crown Commercial Service (CCS) Supply Teacher Framework), we require (at least) two references that must cover the previous two years of employment for all candidates. One reference must be from the candidates' most recent employer. References must be from non-family members who give their consent for the reference to be forwarded to our clients.

We will verify all references by contacting the referee directly by email. Referees must be people that are senior to the candidate and must be contactable at their place of work. Emailed references must be sent to professional email addresses and must be returned in this way.

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In cases where the candidates most recent/currently employer is not a school, we require at least 1 other reference to be completed by a school the candidate last worked at.

References from other employment businesses must, as a minimum, include dates of employment and details of any safeguarding issues if they are known.

In cases where the candidate was the most senior person i.e., the Head Teacher, we will obtain a reference from the Chair of Governors or local authority, supported with a second reference from a colleague on the Senior Management Team to provide a more accurate portrayal of their classroom experience.

We require references to be in writing prior to placement, verbal references are not accepted.

We may ask for a character reference to support any gaps in employment and where the candidate is unable to provide us with a second professional reference. Character referees must work in a recognised professional (in line with the Passport Office's accepted countersignatory professions) and be able to receive and return the reference from their professional email address.

We may accept an open reference as long as we are able to obtain written verification from the referee and it includes the following information: dates of employment, the role the candidate undertook, the candidate was deemed suitable to work with children; the referee would re-employ the candidate and whether the candidate was subject to any disciplinary action and the circumstances, if any.

### **Rehabilitation of Offenders Act Declaration**

During the registration process, all candidates are required to complete our Rehabilitation of Offenders Act Declaration and as required for regulated sections, disclose all spent and unspent convictions, subject to the filtering rules.

If a candidate discloses any convictions or cautions, Step Teachers will consult with the Teacher Regulation Agency and the REC's legal helpline to obtain advice and guidance on whether the candidate can work in the education sector. We will also ensure that the school has a policy on the treatment of ex-offenders, is aware of the conviction/s to allow them to conduct their own risk assessment and determine their assessment of a candidate's suitability for the role in accordance with its policy on ex-offenders.

### **Disclosure and Barring Service and Update Service Checks**

Step Teachers requires all our candidates to have an enhanced Disclosure and Barring Service (DBS) check which includes a check on the Children's Barred List.

We view and take a copy of the physical and original DBS certificate and, with consent from the candidate, carry out a status check on the DBS Update Service. We record details of the check and the date the check is undertaken on the candidate's file. If the Update Service check states that

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there is new information, we will require the candidate to apply for a new DBS certificate before proceeding with their registration.

If the candidate wishes to register with Step Teachers and they are not already on the Update Service, a new DBS check will be required, and we would encourage the candidate to subscribe to the Update Service. If they do not subscribe to the Update Service, we will require a new DBS check to be undertaken at least once a year or earlier if the candidate has a break in service of more than three months. More frequent checks may be required in certain circumstances, such as if required by a school/client or if we receive information about a candidate that requires us to carry out additional checks.

Step Teachers will undertake repeat status checks on the Update Service at least once a year, or more often if required by our clients or if the candidate has a break in service of more than three months.

If the DBS check shows details of a conviction or caution, in line with The School Staffing (England) Regulations 2009 (2), we must email a copy of the DBS to the school.

Following the decision of the Department for Education to remove access to the standalone Children's Barred List checking system for employment businesses from 1<sup>st</sup> April 2021, we cannot conduct this standalone check and we will not place any candidates in a role without a full enhanced DBS check being completed. This check includes a Barred List check.

When reviewing a candidate's DBS certificate, Step Teachers will check that the certificate is for the Child Workforce only and status checks on the Update Service will only be for the Child Workforce. Unless the role being applied for involves regulated activity with both children and adults in accordance with the definition of Regulated activity contained in the Safeguarding Vulnerable Groups Act 2006, we will not accept a previously issued DBS that covers both adult and child workforces.

The definition of 'work with adults', as set out in the Police Act 1997 (Criminal Records) Regulations is narrower than the definition of 'work with children' and refers to providing care to the adult. It is, therefore, not always the case that we will be entitled to view information relating to the adult barred lists. If there is any uncertainty as to whether a particular role is eligible for a criminal record check, we can use the [DBS eligibility tool](#) and, if necessary, obtain guidance from the DBS.

If a particular role is not eligible for an enhanced check against both the child and adult barred lists, we must not proceed with the check and if the candidate has an existing DBS certificate covering both the child and adult workforces, we will require them to undertake a new DBS for the child workforce only.

### Overseas Police Checks

All candidates who have lived and worked in a single overseas country for 6 months or more in the last five years must provide an overseas police check. This will be done in accordance with the

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[Government Guidance](#) particular to each country. Anything else a candidate provides will not be accepted.

If the candidate is unable to provide a police check from the relevant country (for example, if the relevant country does not provide police checks), Step Teachers may accept a statement of good conduct from the candidate's previous employer within the relevant country. We would require the statement to include confirmation that, to the best of their knowledge, the candidate has no criminal convictions and that they know of no reason why the candidate should not work with children.

If we are unable to obtain a police check or a statement of good conduct, we will not proceed with the registration of the candidate.

### **Letter of Professional Standing**

For candidates seeking teaching roles, that have lived or worked overseas in the last 5 years, Step Teachers will require a Letter of Professional Standing be issued by the professional regulatory authority where the individual worked. This check is completed to confirm the candidate's suitability for the role in line with Step Teachers obligations under the Conduct Regulations.

Where the letter cannot be obtained and all reasonable practice steps have been taken to obtain it, Step Teachers will require the candidate provide an alternative document which confirms their suitability for the role. This may be a letter of good standing from the Head Teacher in the school that they worked in or additional professional references. In such a case where the letter of professional standing cannot be obtained, Step Teachers may also refer to the Teacher Regulation Authority [Country of Evidence table](#) for guidance on what other document/s might confirm suitability.

Step Teacher will then inform the client of the steps taken to comply with the suitability requirements which are set out in Regulation 22 of the Conduct Regulations.

### **Qualifications and Early Career Teachers (ECTs)/Newly Qualified Teachers (NQTs)**

Where the client, legislation or any professional body requires the candidate to have a particular qualification or authorisation to work in the position offered by the client, we will obtain copies of original qualifications and authorisations, and these will be available to our clients upon request.

Under the Education (School Teacher's Qualifications) (England) Regulations 2003, candidates being supplied into a teaching position within a maintained school must hold qualified teacher status (QTS) and have successfully completed their induction. This is subject to certain exemptions listed in Annex A of the [Induction for Early Career Teachers \(England\) statutory guidance](#). In addition to checking the qualifications, we will also check the teacher's qualified teacher status via the Teacher Regulation Agency online portal. Please see further details below.



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A qualified teacher who has been awarded QTS but who has yet to complete an induction period can only undertake short term supply work of less than 1 term in a maintained school for a maximum period of 5 years from the award of QTS. An induction programme must be put in place immediately if it becomes clear that the extended assignment will continue for at least a term. Step Teachers will ensure that a teacher who has not satisfactorily completed an induction period is eligible to carry out short term supply work.

Wherever possible, we will work with schools and ECTs/NQTs to find suitable induction placements. In England, an ECT is required to complete 6 full school terms.

Candidates who hold QTLS will need to provide their Level 5+ teaching qualification and QTLS award certificate. We will then verify their QTLS status via the Society for Education and Training (SET).

Other candidates such as Instructors and Support Staff will be asked to provide relevant qualifications if applicable.

Overseas trained teachers must provide us with their original overseas teaching qualification and a comparability certificate issued by the [UK National Information Centre](#) (UK ENIC).

### Teaching Regulation Agency (TRA)

Step Teachers undertakes checks via the Teaching Regulation Agency (TRA), to check a teacher's UK qualified teacher status to ensure that qualification certificates are genuine and that there are no prohibitions or sanctions imposed against the candidate. We will retain a screen print on the teacher's file as a record of these checks.

Additionally, we undertake a check on all non-teaching candidates to ensure that there are no prohibitions or restrictions. A record of this check will be recorded on the candidate's electronic file. If a prohibitions or restrictions is imposed, we will retain a screen print and save it to the candidate's electronic file.

This check is undertaken on an annual basis or if there is more than a three month break in service.

### Health Declaration

To ensure compliance with the Education (Health Standards) (England) Regulations 2002, Step Teachers will ask all candidates to advise us of any health or disability issues that they believe are relevant to the role and which make it difficult for them to carry out functions that are essential to the role.

If a declaration is made, with consent from the candidate, we will obtain confirmation from the candidate's doctor that the candidate is fit to teach. If we are unable to obtain this confirmation we will not proceed with the registration.

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If a teacher has been retired on medical grounds by the Department for Education after 1<sup>st</sup> April 1997, and is currently in receipt of ill health pension or total Incapacity benefit, the teacher will not be able to teach as they have been considered medically unfit. However, if the retirement was before 1<sup>st</sup> April 1997, the teacher may be able to work if they can evidence that they have the health and physical capacity to teach. This can be achieved by obtaining confirmation, in writing, from a GP. In these instances, they can only work a maximum of 2.5 days per week.

### Disqualification Declaration

In order for Step Teachers to comply with our obligations under the Childcare Act 2006 and the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) Extended Entitlement (Amendment) Regulations 2018, we must carry out appropriate checks to ensure that candidates are not disqualified from teaching. Under the rules, individuals can either be disqualified from carrying out work with children in their own right, or disqualified by association because they live with somebody, or have somebody working in their home, who is disqualified.

Disqualification checks are required for all candidates who are seeking work which involves 'relevant childcare roles', such as:

- Provision of early years childcare.
- Later years childcare in nursery, primary or secondary school settings.
- Staff directly concerned with the management of the above.

For candidates who do not work in these 'relevant childcare roles' we will not conduct disqualification checks. For example, staff who do the following are not covered

- Only provide education, childcare or supervised activity during school hours to children above reception age; or
- Only provide childcare or supervised activities out of school hours for children who are aged 8 or over; and
- Are not involved in the management of relevant provision.

Candidates with any relevant offences/orders will not be permitted to register with Step Teachers to work with children under eight years unless they are in possession of an Ofsted Waiver.

### Online Search

In line with Keeping Children Safe in Education statutory guidance, we carry out an online search on shortlisted candidates. Searches will only be used to meet the intended purpose of Keeping Child Safe in Education and will not include irrelevant personal information, nor will any information be used to form an opinion of the candidate.

Searches will be carried out on publicly available information using the Google platform.

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If a search identifies any relevant information that would make a candidate unsuitable to work with children, we will not proceed with the registration of the candidate.

Any data collected during the search will be retained in line with our Data Retention Policy, which is available on request.

### Keeping Children Safe in Education

All candidates must read and sign during the registration process that they have read the Keeping Children Safe in Education Part 1 statutory guidance and then every time that the guidance is updated.

### Child Protection Training

All candidates must at time of registration either complete the free online Step Teachers Child Protection Training or have completed Child Protection Training within the last 2 years and provide us with evidence. All candidates must repeat this training every two years to ensure that their knowledge remains current.

### Prevent Training

All candidates must at time of registration either complete the Home Office Prevent Training or have completed Prevent Training within the last 2 years and provide us with evidence. All candidates must repeat this training every two years to ensure that their knowledge remains current.

### GDPR Training

All candidates must at time of registration either complete the free online Step Teachers GDPR Training or have completed GDPR training within the last 2 years and provide us with evidence.

### Complete/Incomplete Checks

We will only place a candidate with incomplete checks as a last resort, with the written permission of the school and for an agreed period. We will review the status of any outstanding documents regularly and keep the school up to date.

The minimum checks that we would place a teacher on are:

- Face-to-face interview
- Full cv
- Right to work check
- ID and proof of address check

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- Signed Rehabilitation of the Offenders Act declaration
- DBS certificate
- References in progress
- TRA check
- Health declaration
- Online search
- Proficiency of the English Language Assessment
- Read and sign Keeping Children Safe in Education Part 1
- Child Protection training
- Prevent training

### Referrals

Step Teachers as an employment business is a 'personnel supplier' and has a legal requirement under the Safeguarding Vulnerable Groups Act 2006 to refer information to the DBS about individuals who have either harmed, or placed at risk of harm, a child or vulnerable adult.

Where Step Teachers supplies or introduces a candidate to a client school and the client school subsequently removes the candidate from carrying our 'regulated activity' because the client school believes that the person has engaged in 'relevant conduct' or the harm test' is satisfied, Step Teachers must provide information to the DBS about this matter. Additionally, if Step Teachers decides to withdraw our services from the candidate because we believe that the candidate engaged in 'relevant conduct' or that the 'harm test' is satisfied, we must provide information to the DBS about this.

'Relevant conduct' is defined as:

- Conduct which endangers a child or vulnerable adult or is likely to endanger a child or vulnerable adult.
- Conduct which, if repeated against a child or vulnerable adult would endanger or would be likely to endanger him.
- Conduct involving sexual material relating to children (including possession of such material).
- Conduct involving sexually explicit images depicting violence against human beings.
- Conduct of a sexual nature involving a child or vulnerable adult.

Step Teachers has a duty to refer information to the DBS if the 'harm test' is satisfied, i.e. if Step Teachers thinks that the person may:

- Harm a child or vulnerable adult.
- Cause a child or vulnerable adult to be harmed.
- Put a child or vulnerable adult at risk of harm.
- Attempt to harm a child or vulnerable adult.
- Incite another to harm a child or vulnerable adult.

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To ensure compliance with the DBS referral rules, we have processes in place to ensure that all staff are aware of the legal duty to make a DBS referral where necessary and know the process for doing so.

### Continued Suitability

In order to ensure that all candidates registered with Step Teachers meet the safeguarding and suitability requirements on an ongoing basis, at least once a year we will conduct an update service status and Teacher Regulation Authority checks (subject to any shorter period imposed by a client).

Where a candidate has not worked with us for a period of 3 months, we will conduct an update service status check and Teacher Regulation Authority check and obtain an additional reference(s) to cover the period in question.

### Unsuitable Candidates - Information that comes to light after placement

If Step Teachers receives or obtains information after a candidate has been placed in an assignment, which gives reasonable grounds to believe that the candidate **is** unsuitable for the position, we shall, without delay, inform the client school of that information and end the supply of the candidate.

In cases where Step Teachers receives or obtains information which indicates that the candidate **may be** unsuitable, we shall, without delay, inform the client school and commence making such further enquiries as are reasonably practicable as to the suitability of the candidate for the position concerned and inform the school of the enquiries made and of any other further information received or obtained. Where, as a result of the enquiries made, Step Teachers has reasonable grounds to believe that the teacher is unsuitable for the position concerned, we shall, without delay, inform the client school of that information and end the supply of the candidate.

With regards to a candidate that has been placed permanently with a client school and if within a period of 3 months from the date of the introduction, Step Teachers receives or obtains information which indicate that the candidate is or may be unsuitable, we shall, without delay, inform the school of that information.

**Policy reviewed 09/2024**