Safer Recruitment Policy
2025-2026

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Purpose

The safety and wellbeing of our learners is our top priority, and we take all reasonable and sensible measures to ensure they are kept safe from harm. This Safer Recruitment Policy is a key part of our wider safeguarding culture and ensures that all employees who work with our learners share our commitment to safeguarding and promoting the welfare of young people. It has been written with regard to key legislation and regulatory guidance.

Scope

This Safer Recruitment Policy applies to employees, workers, contractors and subcontractors of Netcom Training Ltd (Netcom).

While the majority of our learners are adults, this policy also applies to any programmes involving learners under the age of 18.

This policy will be reviewed annually or sooner if there are changes in legislation, guidance, or organisational structure. Feedback from hiring managers and candidates will inform future updates.

Introduction

The recruitment process in Netcom is the first step to creating a culture where safeguarding and the welfare of our learners are our top priority. All employees, contractors and volunteers are expected to share this commitment.

The aims of the recruitment policy are as follows:

- To ensure that the best possible staff are recruited based on their merits, abilities, and suitability for the position.
- To ensure that all job applicants are considered equally and consistently.
- To ensure that no job applicant is treated unfairly on any grounds including race, nationality, ethnicity, religion or religious belief, sex, or sexual orientation, marital or civil partner status, disability, or age.
- To ensure compliance with all relevant legislation, recommendations and guidance including (but not limited to): the Equality Act (2010), Keeping Children Safe in Education, the Employment Rights Act (1996), ACAS guidance, the Data Protection Act (2018) and any guidance or code of practice published by the Disclosure and Barring Service (DBS).
- To ensure that Netcom meets its commitment to safeguarding and promoting the welfare of our learners and employees by carrying out all necessary pre-employment checks.

All employees involved in the recruitment and selection of staff are responsible for familiarising themselves with and complying with the provisions of this policy.

Netcom has a principle of open competition in its approach to recruitment and will seek to recruit the best applicant for the job. The recruitment and selection process should ensure the identification of the person best suited to the job based on the applicant's abilities, qualification, experience, behaviours, and merit as measured against the job description and person specification.

If a member of staff involved in the recruitment process has a close personal or familial relationship with an applicant, they must declare it to a director as soon as they are aware of the individual's application and avoid any involvement in the recruitment and selection decision-making process.

Netcom aims to operate this procedure consistently and thoroughly while obtaining, collating, analysing, and evaluating information from and about applicants applying for job vacancies.

Equality, Diversity, and Inclusion (EDI) in Recruitment

Netcom Training Ltd is committed to creating an inclusive recruitment process that supports individuals from all backgrounds, including those with protected characteristics under the Equality Act 2010. EDI refers to Equality, Diversity, and Inclusion—principles that ensure fair treatment, representation, and opportunity for all individuals regardless of background or identity.

We recognise that individuals may face overlapping forms of disadvantage and are committed to addressing these through inclusive recruitment practices. We also recognise the value of diversity in the workplace and aim to provide equitable opportunities through:

- Offering reasonable adjustments during recruitment and onboarding.
- Ensuring all hiring managers are trained in inclusive recruitment practices and EDI awareness.
- Reviewing recruitment processes to identify and remove barriers for underrepresented groups.
- Implementing a rejection management process that is sensitive to the needs of all applicants, including those with Rejection Sensitive Dysphoria (RSD).
- Encouraging safe disclosure of individual needs and protecting confidentiality.
- Capturing and analysing EDI data to inform inclusive practices, including through employee surveys and feedback mechanisms.
- Promoting a culture of respect, openness, and continuous improvement in line with our culture.

All data will be collected and stored in accordance with the Data Protection Act 2018 and used solely to inform improvements in recruitment and inclusion practices.

Rejection Management Process (RSD-Informed)
Netcom Training Ltd recognises that rejection during the recruitment process can be particularly challenging for individuals with Rejection Sensitive Dysphoria (RSD), a condition often associated with neurodivergent candidates. To promote dignity, empathy, and inclusion, the following RSD-informed rejection management process will be followed:

1. Pre-Rejection Preparation:
   a. Where possible, communicate anticipated recruitment timelines and next steps at the outset, while making candidates aware that these may be adjusted as needed to accommodate unforeseen circumstances or individual needs.
   b. Offer candidates the option to receive constructive feedback if they are not selected.
2. Tone and Language of Rejection:
   a. Use empathetic and non-judgmental language in all rejection communications.
   b. Avoid phrasing that implies failure or inadequacy.
3. Supportive Communication:
   a. Include positive affirmations and constructive suggestions for future applications.

4. Offer Feedback and Resources:
   a. Provide optional, specific, and actionable feedback.
   b. Provide candidates with links to support resources, such as EDI groups, coaching, or future opportunities, by including standardised templates and resource lists.
5. Follow-Up Option:
   a. Allow candidates to respond or ask questions about the decision.
   b. Assign a named HR contact trained in EDI or mental health awareness for follow-up.
6. Internal Training and Awareness:
   a. Hiring managers and recruiters are given guidance on RSD and empathetic rejection practices.
   b. Include guidance on handling emotional responses professionally and supportively.
7. Data and Continuous Improvement:
   a. Track feedback opt-ins and candidate responses to identify patterns.
   b. Apply insights to enhance candidate experience and minimise unintended harm.

While this process is designed with RSD in mind, it reflects our broader commitment to treating all candidates with empathy and respect.

Neurodivergent refers to individuals whose neurological development and functioning differ from what is considered typical, including conditions such as autism, ADHD, and dyslexia.

Recruitment process

Authorisation to Recruit
Only Heads of Department and above are authorised to act as hiring manager: this is the individual who takes overall ownership for the recruitment process for a vacancy. Prior to any recruitment activity taking place, the hiring manager must obtain permission to recruit from the Managing Director and another director: this is usually either the Chief Finance Officer or the HR Director or, for newly created roles, the Chief Executive Officer. When obtaining permission, the following details should be agreed:

- the role outline.
- job description (on the standard Job Description Template with our safeguarding commitment included).
- salary level.
- line manager.
- location.

Hiring managers should undergo Safer Recruitment training at least every 2 years.

Publishing the Vacancy
Once permission to recruit has been granted, the hiring manager should publish the vacancy: this will usually be either via the internal Talent Team or, where necessary, through an external recruitment agency. Use of external agencies must be approved by the HR Director.
Once live, candidates will be required to provide basic personal details (such as name and contact number), and a copy of their CV.

Selection Process

V1/MS/July 24

Commented [MS1]: Do we do this?

Commented [KD2R1]: we don't but I thought we could put a video guide together to cover this

Commented [MS3R1]: Ah, okay. Or you could change it to just 'awareness' saying that hiring manages are given guidance in this area based on the information in this policy?

The selection process will be made up of a minimum of two stages: application review and an interview. Depending on the role, the hiring manager may decide to include additional stages to the process. These could include:

- Second stage interview
- Group assessment centres
- Written/online task

Advice on the most appropriate selection process can be sought from the HR department.

Application Review

The hiring manager will receive details of suitable applicants from the recruiter. When reviewing applications, hiring managers must consider the following information:

- Level of relevant experience.
- Level of relevant qualifications.
- How closely the individual matches the job description.

The hiring manager should also check if the candidate has requested any reasonable adjustments as part of the selection process. If so, additional guidance should be sought from the HR department.

The hiring manager should also look for the following flags which may indicate a safeguarding concern (this list is not exhaustive):

- Inappropriate motivation for applying.
- The candidate describes viewing learners of all ages as peers or emphasizes close or particularly special relationships with them.
- Unexplained gaps in the candidate's history.

Once reviewed, the hiring manager should either invite the candidate to a first stage interview or decline their application.

First Stage Interview

The first stage interview can take place online or in person. Prior to the interview, the hiring manager should create a list of questions that will form the basis for all interviews for the position. Questions should be related to the role and designed to elicit information that can be used to determine the candidate's suitability for the position. Questions should not be asked about irrelevant issues such as the applicant's dependants, religious beliefs or marital status. Hiring managers should treat the predetermined questions as a framework for the interview and follow up answers with probing questions to elicit relevant information depending on the response.

At the start of the interview, the hiring manager should introduce themselves and any other interviewer present. They should check on the wellbeing of the candidate and explain what the interview will cover and the length of time it will take.

During the interview, the hiring manager (and any other interviewer) should take notes on the candidate's responses so they can refer to them when determining next steps. The hiring manager should explore any safeguarding concerns with the candidate (such as gaps in employment history) and note the response. If responses are not satisfactory, the hiring manager should

discuss this with the Designated Safeguarding lead (DSL) or HR department immediately following the interview.

At the end of the interview, the hiring manager should ask the candidate if they have any questions, confirm next steps (when they can expect to hear from us) and thank the candidate for their time.

Additional Stages
The hiring manager may choose to have additional stages of the selection process, if appropriate for the role. Any additional stages must be directly relevant to the role and support good decision making.

Interviews for Development Coaches and other teaching roles are likely to include a short teaching session.

Advice on appropriate additional stages can be sought from the HR Department.

Making an Offer
Once all shortlisted candidates have been interviewed, the hiring manger should contact the successful candidate by phone to verbally offer the position. The verbal offer should cover the following details:

- That the offer is conditional pending all safer recruitment checks.
- The salary to be offered (plus details of any commission).
- Provisional start date.
- That an offer letter confirming the key details will be emailed out shortly.

If the candidate provisionally accepts, the hiring manager should then complete the Offer to a Candidate Form. This form notifies the HR department automatically. Upon receipt, the HR department will create the offer letter and send it to the candidate.

Onboarding and Pre-employment checks
Once the individual has accepted the offer, the HR Department will begin the pre-employment checks. These are:

1. ID check
2. Right to Work check
3. Basic DBS check
4. Qualifications check
5. Medical Fitness check
6. Overseas check (if applicable)

These checks should be completed before the start date of the employee, or as soon as possible thereafter.

ID Check
The candidate must provide valid photo ID. This is usually a photocard driving licence or valid passport. This ID must be physically checked in person on the first day of employment (or before) and a copy of the ID put on the employee's BambooHR file.

Right to Work check

Right to work documentation must be checked in person on the first day of employment or before. A copy of all relevant documentation should be made with the checker's name, signature and date of check written on it. This copy should then be uploaded to the employee's file on BambooHR. Right to work checks can be complicated and statutory processes change from time to time. Up to date information on how to perform a valid right to work check can be found on the government website: https://www.gov.uk/check-job-applicant-right-to-work Guidance can also be given by the HR department.

DBS check

As an online education provider to adults, most of the roles within our organisation involve online indirect contact with our learners. As such, we apply for a Basic DBS check prior to the individual's start date. The DBS application will be managed by a member of the HR Department. The application will be started once the offer has been accepted by the candidate. The certificate will be posted to the applicant's home address; once it has been received, the individual must bring the original certificate into work to be checked by the HR Department. If the DBS certificate is returned with information contained within it, a decision will be made on whether to withdraw the offer of employment or not in line with the 'Recruitment of Ex-offenders' policy.   For more information, refer to the Group's Recruitment of Ex-Offenders Policy, which outlines how disclosures are assessed fairly and in line with the Rehabilitation of Offenders Act 1974.

It is advisable to set a start date, that allows sufficient time for a DBS check to be completed, however, if the DBS certificate has not been received prior to the applicant's start date, they can begin work, but a risk assessment will need to be completed to identify and manage any risks. Under no circumstances will an individual be allowed to work with our learners until a DBS check has been completed. Further information about such a scenario can be found in the 'Starting employment before the completion of all checks' section below.

Where a role involves regulated activity with children or vulnerable adults, an Enhanced DBS check with the relevant barred list check will be required, in line with legal eligibility.

Qualifications Check

We will need to see proof of qualifications that are relevant to the role being offered; this is usually through seeing original certificates. Where certificates are not available, other means of demonstrating participation or completion of the course (such as an email from the course provider) may be sufficient.

Medical Fitness Check

As stated in *Keeping Children Safe in Education,* we are required to assess a candidate's medical fitness to carry out their role prior to them starting work. As part of the onboarding tasks, we will ask the candidate to complete a medical fitness questionnaire prior to their start date. The completed form will then be reviewed by the HR department: any medical information disclosed will be assessed and, where necessary, additional clarification sought from the candidate. If necessary, the HR Department will complete a medical risk assessment to identify and manage any medical risks.

Overseas Check

As stated in *Keeping Children Safe in Education,* we are required to make additional checks where a candidate has been overseas for a period of three months or more within the last 5 years. Where this is the case, we will seek additional checks following advice from the Government website:

https://www.gov.uk/government/publications/criminal-records-checks-for-overseas-applicants

Where certificates of good conduct cannot be obtained, other evidence of good conduct (such as a reference from an employer from the time they were abroad) will be used to determine the risk associated with their time outside the UK.

Single Central Register

In line with KCSIE, we are required to keep a record of each employee on the Single Central Register (SCR). This will record the dates when each of the checks in the above section were completed. It will also record the employee's name, start date and role title. The SCR will be updated by the HR Department daily. The SCR also contains a notes column where any relevant information pertaining to the pre-employment checks is recorded.

Starting Employment Before Completion of All Checks

In some cases, there may be some pre-employment checks that are incomplete prior to the employee's start date. In such cases, the HR Department will complete a risk assessment to identify whether the individual can start employment and, if so, what measures should be put in place to reduce the risk of safeguarding issues to an acceptable level. Any individual who is responsible for one or more of the measures will be notified by the HR Department prior to the start date.

When undertaking a risk assessment, the assessor should consider the following:

- Whether the individual has declared any criminal record, warnings or reprimands, the nature of these and the time that has elapsed since.
- What information is available through the checks that have been completed (e.g. if satisfactory references have been received).
- The nature of the individual's job role.

Safer Recruitment and Safeguarding in Induction

When a new employee starts in the business, they will undergo an induction process, arranged by the line manager to give them the skills and knowledge required to start their role. A key part of this is ensuring that they have a good understanding of safeguarding and child protection, as well as their role and responsibilities in protecting learners from harm.

All new employees will complete the following training in the first 30 days of their employment:

- Safeguarding for Further Education and Training Settings
- Prevent training
- Diversity, Equality and Inclusion training

They must also complete a declaration to confirm that they have read and understood the relevant parts of KCSIE.

They will also take part in a training session with the DSL. This session will reinforce the employee's responsibilities regarding safeguarding and various internal information such as who comprises the Safeguarding Team and how to submit a safeguarding concern.