



UK

## Safe recruitment policy

(including policy on the recruitment of ex- offenders, Appendix 1)

<b>Location</b>	Oxford Campus, C/o Activate Learning, Jericho Building, Oxford OX1 1SA
<b>Monitoring</b>	The Principal in collaboration with the person responsible for HR, the Heads of Programme
<b>Overall responsibility</b>	Board of Directors
<b>Created</b>	August 2021
<b>Last review</b>	August 2025
<b>Next review</b>	August 2026 or as necessary

### 1. General

EM Normandie UK Limited (hereafter 'EMN' or 'EMN UK' or 'the School') is committed to ensuring the best possible environment for children and young people in our care. Safeguarding and promoting the welfare of children and young people is our highest priority.

The company aims to

- ensure that the best possible applicants are recruited as employees and contractors on the basis of their merits, abilities and suitability for the position
- recruit staff and contractors who share and understand our commitment and the values and ethics expressed through our organisation's core values and mission statement
- to deter, identify and prevent access to, applicants who may present a threat to the safety of children and young people
- ensure that no job applicant is treated unfairly by reason of a protected characteristic as defined within the Equality Act 2010.

All queries regarding the company's application and recruitment process must be directed either to the person responsible for HR or to the Principal.

All checks will be made in advance of appointment or, if this is not possible, as soon as practicable after the appointment.

EMN occupies premises within the Further Education College in Oxford, run by **Activate Learning**. In view of ensuring that all safeguarding requirements for their own students are met, Activate Learning may from time to time require access to the information resulting from the DBS checking process of all EMN employees and contractors.

**Activate Learning** is a Further Education Corporation, registered under the Further and Higher Education Act (1992) on 01 April 2003, as Oxford and Cherwell College. The Corporation was renamed



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Oxford and Cherwell Valley College on 17 August 2005 and became Activate Learning on 01 September 2013.

Activate Learning is an exempt charity under Part 3 of the Charities Act 2011 and, since July 2016 is being regulated by the Secretary of State for Education. The Activate Learning Group includes Activate Enterprises Ltd, Activate Investments Ltd and the Activate Learning Education Trust, of which Activate Learning is a member.

EMN provides Activate Learning with the names of all employees and contractors.

In cases where questions arise regarding the suitability of an applicant with EMN gaining access to children and vulnerable adults, Activate Learning and EMN will reach a common decision.

Entries will be made on a Central Registers for all EM Normandie employees and all contractors engaged in the context of teaching courses, or research activities, competitions, admission tests or examinations organised by EMN, or any other activities.

## **2. Scope of this Policy**

The recruitment, selection and disclosure procedures in this document refer and apply to staff directly recruited and employed or engaged by EMN, i.e., any person working at the School whether under a contract of employment or a different contract, or otherwise than under contract with EMN.

## **3. Application**

The School will make applicants aware that all posts in the School involve some degree of responsibility for safeguarding children, although the extent of that responsibility will vary according to the nature of the post.

Checks will be made of the previous employment history disclosed by the applicant, and we may ask the applicant to explain gaps in their employment history. Any discrepancies will be discussed with the applicant.

As successful applicants will gain opportunity for access to children, it is important that they provide EMN with legally accurate answers during the application process. Upfront disclosure of a criminal record may not automatically disqualify an applicant from an appointment. EMN shall consider the nature of any offence, how long ago it was committed, the person's age at that time and any other relevant factors. Information should be submitted in confidence enclosing details in a separate sealed envelope to the Principal. If applicants would like to discuss this beforehand, they are asked to please telephone the Principal for advice.

Any unspent convictions, cautions, reprimands or warnings must be disclosed to EMN immediately. However, amendments to the Exceptions Order 1975 (2013) provide that certain spent convictions and cautions are 'protected' and are not subject to disclosure to employers and cannot be considered. Guidance and criteria on the filtering of these cautions and convictions can be found at the Disclosure and Barring Service website:

[www.criminalrecordsservices.com/dbs-check/what-is-the-difference-between-spent-and-unspent-convictions](http://www.criminalrecordsservices.com/dbs-check/what-is-the-difference-between-spent-and-unspent-convictions)

Successful applicants have to be aware that all Disclosure and Barring Service and other checks will be carried out by EMN and the information received will be retained by EMN and disclosed to Activate Learning.

Additionally, successful applicants should be aware that they are required to notify EMN immediately if there are any reasons why they should not be working with children. This includes any individuals who are disqualified from childcare or registration.



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EMN will ask the current employer and/or any referees about the applicant's suitability to work with children. Where the applicant has no previous employment history, EMN may request character references which may include references from the applicant's school or university.

All applicants should be aware that providing false information is an offence which could result in the application being rejected, or in summary dismissal by EMN if they have been appointed, and a possible referral to the police and/or DBS.

#### **4. Interview**

- The school will short list applicants according to the relevance and applicability of their professional attributes and personal qualities to the role.
- Short-listed applicants will then be invited to attend a formal interview (face-to-face or on-line) during which their relevant skills and experience and the requirement of the role they have applied for will be discussed in more detail.
- All formal interviews for new employees will be carried out by the Principal who may ask for another appropriate member of staff to assist.
- Formal interviews of adjunct lecturers and other contractors will be carried out by the relevant Head of Programme who may ask for the Principal or another appropriate member of staff to assist.
- Interviewers involved in this process will be required to state any prior personal relationship or knowledge of any of the applicants and a judgement will be made by the Principal as to whether or not another person should carry out the interview. Should the Principal have a conflict of interest, they will be replaced by another Company Director, or a person designated by them for the purpose of the interview.

All applicants (contractors and employees) will be asked to submit or demonstrate

- a valid passport (or current driving licence for UK citizens only), or a full birth certificate (originals only)
- for the purpose of obtaining a DBS check, 2 utility bills and/or financial statement and/or other documents permitted in the government's guidelines and issued within certain time limits prior to the submission, showing the applicant's current name and address
- proof of professional qualifications where applicable and if requested
- details of at least two professional referees who have agreed to provide information
- personal details
- where applicable, proof of entitlement to work and reside in the UK
- a completed self-disclosure form
- valid Public Liability Insurance (contractors only)

Applicants with a disability who are invited to interview should inform EMN of any necessary reasonable adjustments or arrangements to assist them in attending the interview.

#### **5. Conditional Offer of Appointment: Pre-Appointment Checks**

Any offer of employment made will be conditional upon

- receipt of at least two satisfactory references (if these have not already been received)
- verification of identity and qualifications including, where applicable, evidence of the right to work in the UK



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- satisfactory enhanced DBS check and, if appropriate, a check of the Barred List maintained by the DBS
- where the successful applicant has worked or has been residing overseas: any additional checks and confirmations that the School may consider appropriate to allow any relevant events that occurred outside the UK to be considered.
- receipt of a signed Self-disclosure form stating whether the applicant has ever been known to Children's services department or police as a risk or potential risk to children, or has been the subject of any investigation/sanction due to concerns about their behaviour towards children, or has been the subject of disciplinary sanctions or asked to leave employment /voluntary activity due to inappropriate behaviour towards children

## 6. References

- The school will seek the references referred to in section 5 above for shortlisted applicants and may approach previous employers for information to verify particular experiences or qualifications. One of the references should be from the applicant's current or most recent employer.
- By communicating their referees' contact details, the applicant consents to EMN approaching them to ask for a detailed reference.
- References must be received by a senior person with appropriate authority.
- EMN will ask all referees whether, in their opinion, the applicant is suitable to work with children.
- EMN will only accept references obtained directly from the referee and it will not rely on references or testimonials provided by the applicant, or on open references or testimonials. The school will verify all references. Where references are received electronically, the school will ensure they originate from a legitimate source.
- The school will compare any information provided by the referee with that provided by the applicant. Any inconsistencies will be discussed with the applicant.

## 7. Criminal Records Policy

EMN will refer to the Department for Education ("DfE") document, 'Keeping Children Safe in Education' and any amended version in carrying out the necessary required DBS checks.

EMN complies with the provisions of the DBS Code of Practice, a copy of which may be accessed via [www.gov.uk/government/publications/dbs-code-of-practice](http://www.gov.uk/government/publications/dbs-code-of-practice).

### DBS Update Service

Where an applicant subscribes to the DBS Update Service the applicant must give consent to EMN to check there have not been changes since the issue of a disclosure certificate. A barred list check will still be required.

### If the DBS check has been delayed

A short period of work is allowed under controlled conditions, at the Principal's discretion. If an 'enhanced disclosure' is delayed, the Principal may allow the member of staff or contractor to commence work after due consideration of all other sources of information available.

## 8. Retention, Security of Records and Data Protection Obligations

The school will comply with its obligations regarding the retention and security of records in accordance with the DBS Code of Practice and its obligations under its Data Protection Policy and the processing of criminal records information. More information can be found in the Data Protection Policy and the Recruitment Privacy Notice, accessible on our website or on request from the Principal or Office Manager.

The school will comply with its data protection obligations in respect of the processing of criminal records information. More information on this is included in the Recruitment Privacy Notice and the Data Protection Policy.

Please note that Activate Learning's Privacy Notice for Staff of Third Party Companies on Activate Learning premises also applies and can be accessed via

[www.activatelearning.ac.uk/who-we-are/privacy-and-data-protection](http://www.activatelearning.ac.uk/who-we-are/privacy-and-data-protection)

### Annex 1 - Control table

Version	v1	Name	Role	Date
Created by :		Birgit Muller	Office Manager	Aug 2021
Approved by :		Miriam Schmidkonz, Principal		
Version	v2	Name	Role	Date
Reviewed by :		Birgit Muller	Office Manager	May 2022
Changes approved by :		Miriam Schmidkonz, Principal		
Version	v3	Name	Role	Date
Reviewed by :		Birgit Muller	Office Manager	Aug 2024
Changes approved by :		Miriam Schmidkonz, Principal		
Version	v4	Name	Role	Date
Reviewed by :		Birgit Muller	Office Manager	Aug 2025
		Minor changes to wording, not effecting the content		
Changes approved by :		Miriam Schmidkonz, Principal		
Version		Name	Role	Date
Reviewed by :				



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Changes approved by :		