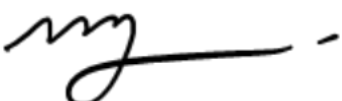


Apprentify Safer Recruitment Policy

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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 staff 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 Apprentify Ltd (AL).

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 safe recruitment of staff in AL 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, Working Together to Safeguard Children, 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 AL meets its commitment to safeguarding and promoting the welfare of children and young people 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.

AL 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.

AL 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

AL is dedicated to ensuring an inclusive recruitment process that welcomes and supports people from all backgrounds, including those with protected characteristics under the Equality Act 2010. EDI—Equality, Diversity, and Inclusion—reflects our commitment to fair treatment, meaningful representation, and equal opportunities for everyone, regardless of identity or background.

We understand that some individuals may experience multiple, overlapping forms of disadvantage, and we are committed to addressing these through inclusive and equitable recruitment practices. We also recognise the strength that diversity brings to our organisation and strive to create fair opportunities by:

- Accommodating reasonable adjustments throughout the recruitment and onboarding process
- Fostering a culture of respect, openness, and continuous improvement that aligns with our organisational values

Recruitment process

Authorisation to Recruit

Line managers will act as the hiring manager in most cases but will always be accompanied and guided by a senior manager, usually the head of department. Prior to any recruitment activity taking place, the hiring manager must obtain permission to recruit from a 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 [Apprentify Job Description template](#) with our safeguarding commitment included);
- salary level;

- line manager;
- location.

Hiring managers should undergo Safer Recruitment training at least every five 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

The selection process will be made up of a minimum of three stages: application review; first stage interview; second stage interview. Depending on the role, the hiring manager may decide to include additional stages to process. These could include:

- Group assessment centres
- Written/online task
- Telephone screening

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 talks about children as equals or deep/special relationships with children;
- 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 but usually is in the format of a teams' call with the hiring manager. Prior to the interview, the hiring manager should create a list of questions that will form the basis for all first stage 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 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.

Second Stage Interview

The second stage interview can take place online or in person but usually is in the format of an in-person interview with both the hiring manager and Head of Department. It is usual practice that the candidate will be asked to prepare and deliver a task for the second stage interview, this will vary based on the role.

Prior to the interview, the hiring manager should create a list of questions that will form the basis for all second stage 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 and their performance during the task, should they be asked to complete one. These notes can then be referred when determining next steps. The hiring manager should

explore any further 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 DSL and the 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 Trainers and other teaching roles are likely to include a short teaching session referred to as a 'micro-teach', a 15-20 minute teaching session on a given topic.

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

Making an Offer

Once all shortlisted candidates have been interviewed, the hiring manager 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](#) available on the Apprentify SharePoint. 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

This section is divided into two, to explain the approach to the two different kinds of role:

1. Roles that will engage in regulated activity
2. Roles that will not engage in regulated activity

Onboarding and Pre-employment checks for roles that will engage in regulated activity

This section outlines the onboarding process and pre-employment checks for individuals joining the business in a role that requires them to engage in regulated activity.

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. Enhanced DBS check with children's barred list check
4. Qualifications check
5. Medical Fitness check
6. Reference check
7. Online check

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

ID Check

For all roles within Apprentify Ltd, candidates must provide valid photo identification, typically a photocard driving licence or a valid passport.

The ID must be verified either:

- In person on or before the first day of employment, or
- Through an approved digital ID checking service.

A copy of the verified ID will be uploaded to the employee's BambooHR file for record-keeping.

Right to Work check

For all roles within Apprentify Ltd, candidates must provide valid right-to-work documentation on or before their first day of employment, either:

- In person, or
- Using our digital ID checking service.

Documentation Requirements:

- A copy of all relevant documents must be taken, with the checker's name, signature, and date of check clearly recorded, or
- A copy of the digital ID check report, or
- A copy of the government right-to-work confirmation generated using the candidate's share code.

All copies must be uploaded to the employee's BambooHR file for compliance and record-keeping.

Important:

Right-to-work checks can be complex, and statutory requirements may change. For the latest guidance, refer to: <https://www.gov.uk/check-job-applicant-right-to-work> Additional support is available from the HR department.

Enhanced DBS check

As an education provider to learners aged 16 and above, some roles within Apprentify Ltd involve working with children and young people regularly. For any individual who will engage in regulated activity we will obtain an Enhanced DBS with Children's Barred List Check.

Application process:

- Application submission is mandatory prior to the start date.
- Managed by the HR Department; the candidate completes the application after accepting the offer.
- The DBS certificate is sent to the candidate's home address. Once received, the original certificate must be presented to HR for verification.

If the DBS Certificate Contains Information:

- HR will review and decide whether to proceed or withdraw the offer in line with the *Recruitment of Ex-Offenders Policy*.
- If candidate is applying for a role in regulated activity and they are on the child's barred list the HR department will inform the relevant external bodies.

If the DBS Certificate Is Delayed:

- The individual may start work only after a documented risk assessment is completed to identify, manage, and minimise risks.
- Under no circumstances will the individual work unsupervised with children until HR has verified the DBS certificate.
- Further details are outlined in the *Starting Employment Before Completion of All Checks* section.

Qualifications Check

We request to see proof of qualifications that had a bearing on the decision to hire the individual; this is usually through seeing original certificates. Where certificates are not available, other means of demon

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.

Reference Check

We will seek references for every appointment within Apprentify Limited. For those who will engage in regulated activity, we will seek two references, one of which will be from the applicant's most recent employer. The referees will be sent a copy of our reference template, which asks specific questions in relation to the applicant's suitability to work with children. There may be circumstances where it is not possible to obtain two professional references; in such cases, the HR department will decide on the appropriate checks to undertake.

Onboarding and Pre-employment checks for roles that will not engage in regulated activity

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. Enhanced DBS check with children's barred list check
4. Qualifications check
5. Medical Fitness check
6. Reference check
7. Online check

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

ID Check

For all roles within Apprentify Ltd, candidates must provide valid photo identification, typically a photocard driving licence or a valid passport.

The ID must be verified either:

- In person on or before the first day of employment, or
- Through an approved digital ID checking service.

A copy of the verified ID will be uploaded to the employee's BambooHR file for record-keeping.

Right to Work check

For all roles within Apprentify Ltd, candidates must provide valid right-to-work documentation on or before their first day of employment, either:

- In person, or

- Using our digital ID checking service.

Documentation Requirements:

- A copy of all relevant documents must be taken, with the checker's name, signature, and date of check clearly recorded, or
- A copy of the digital ID check report, or
- A copy of the government right-to-work confirmation generated using the candidate's share code.

All copies must be uploaded to the employee's BambooHR file for compliance and record-keeping.

Important:

Right-to-work checks can be complex, and statutory requirements may change. For the latest guidance, refer to: <https://www.gov.uk/check-job-applicant-right-to-work> Additional support is available from the HR department.

Basic DBS Check

For all employees who do not engage in regulated activity, Apprentify Ltd will apply for a Basic DBS check.

Application Process:

- Managed by the HR Department; the candidate completes the application after accepting the offer.
- The DBS certificate will be sent to the candidate's home address. Once received, the original certificate must be presented to HR for verification.

If the DBS Certificate Contains Information:

- HR will review and decide whether to proceed or withdraw the offer in line with the Recruitment of Ex-Offenders Policy.

If the DBS Certificate Is Delayed:

- The individual may start work, and dependant on the role, a risk assessment may be undertaken to identify and mitigate any safeguarding risks.
- Further details are outlined in the Starting Employment Before Completion of All Checks section.

Qualifications Check

We request to see proof of qualifications had bearing on choice to hire; this is usually through seeing original certificates. Though in most cases outside of those who engage in regulated activity,

especially in junior roles, there are no relevant qualifications to be requested. Where certificates are relevant, but 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. This form is not obligatory and candidates have the right to choose not to complete it.

Reference Check

We will seek references for every appointment within Apprentify Limited. Ideally, we will seek two references. The referees will be sent a copy of our reference template, which asks specific questions in relation to the applicant's suitability to work with children. For those that do not engage in regulated activity, there may be circumstances where it is not possible to obtain two professional references; in such cases, the HR department will decide whether there are any further appropriate checks to undertake.

Change of Roles

If an individual's role changes whilst in employment with AL that will require the individual to engage in regulated activity, the correct level of DBS check will be obtained prior to the individual commencing the new role.

Single Central Register (SCR)

In line with KCSIE, we are required to keep a record of each employee on the SCR. This will record the dates when each of the checks in the above section were completed. The SCR for AL includes all employees who are on the Apprentify Limited Payroll, this includes some employees who work under different operating names of AL (such as Flourish and Juice Academy). It will also record the employee's name, start date and role title. The SCR will be updated by the HR Department. 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 cases where the employee's role will involve engaging in regulated activity, 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.

Under no circumstances should an employee work in an unsupervised capacity with young people under the age of 18 without a child's barred list check being completed, which is part of the DBS check detailed above. Where an individual is required to be supervised when working with children, the supervisor must be someone who works in regulated activity as defined in KCSIE.

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.

If upon completion of outstanding checks there is new information that brings into question suitability employment will be reviewed.

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.