



# THE BRITISH RACING SCHOOL

## Safer Recruitment Policy

<b>Adopted:</b>	June 2018
<b>Updated:</b>	May 2021
<b>By:</b>	Natalie Bennett
<b>Review Date:</b>	May 2022

**This Policy links to:**

- Keeping Children Safe in Education 2020 (Post EU Exit)

## BRITISH RACING SCHOOL SAFER RECRUITMENT POLICY

The aim of this Safer Recruitment policy is to create a culture of safer recruitment whereby The British Racing School (BRS) adopts recruitment procedures that deter, reject or identify people who might abuse trainees and young people, or who might otherwise be unsuited to working with trainees and young people.

The BRS will ensure compliance with all relevant legislation, recommendations and guidance including the statutory guidance published by the Department for Education (DfE), Keeping Children Safe in Education - September 2020 (KCSIE) Updated Post EU Exit.

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

### Pre-employment checks:

The BRS will ensure that the School meets its commitment to safeguarding and promoting the welfare of trainees and young people by carrying out all necessary pre-employment checks as outlined below:

- **Advertisements for vacancies must clearly state:**
  - BRS committed to safeguarding
  - BRS will undertake DBS check
- **Application form.** All applicants, including those for Chief Executive, Trustee, senior manager and self-employed positions, must complete a BRS application form. The form gives clear instructions to applicants to explain any gaps in their employment (e.g. illness, gap year etc).

At interview, the panel will discuss an applicant's application form and will question employment gaps as well as periods when the applicant has worked abroad.

- **References.** At least two references must be taken up. One must be current employer or most recent employer, and the second should be previous employer. No personal references will be accepted or references that use a personal email address. This check applies to all appointments, including the appointment of a Chief Executive, Trustee and senior manager.
- **Identity Checks.** Identity checks will be completed on all prospective employees and this will begin the application for their Disclosure and Barring Service (DBS) check. New employees must provide documentation in line with government guidelines: <https://www.gov.uk/government/publications/dbs-identity-checking-guidelines/id-checking-guidelines-for-dbs-check-applications-from-3-september-2018> Photocopies must be taken of all ID provided and all copies must be signed and dated by the ID checker. Photocopies will be kept on individual's HR file.

- **Disclosure and Barring Service (DBS) check.** All BRS staff are engaged in regulated activity, therefore an online Enhanced DBS check will be done for all employees, with the child-barred list checked. This includes new staff who already have an Enhanced DBS certificate from another organisation. All DBS certificates are logged on the BRS Single Central Record. Copies are not kept on file. Where a DBS check is returned showing a criminal record and/or caution, BRS will request to see the original certificate. The BRS Operations Director and safeguarding team will consider whether the offence is relevant to the person's work within the School and a decision will be made as to whether the individual's employment can proceed.

The BRS uses GB Recruitment for its DBS checks <https://gbrs.onlinedisclosures.co.uk/>

For Trustee appointments, an Enhanced DBS check is required. The children's-barred list does not need to be checked.

Disclosure and Barring Service (DBS) checks will be updated every 5 years. A risk assessment will be carried out (or new DBS check) when there has been a break in employment.

Where a prospective employee has registered for the DBS Update Service, they must provide their DBS number and full name so that BRS HR can use this information to access the Update service. The prospective employee must also show BRS HR the original DBS certificate that is registered on the DBS Update service in their name. This is so that any previous convictions and/or cautions, that occurred before the prospective employee joined the DBS Update Service, can be noted and considered.

- **Right to Work.** Right to work in the UK checks will be completed on all new employees in line with government guidance. Acceptable documents will be in line with government advice:  
[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/441957/employers\\_guide\\_to\\_acceptable\\_right\\_to\\_work\\_documents\\_v5.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/441957/employers_guide_to_acceptable_right_to_work_documents_v5.pdf)
- **Qualifications** will be checked by HR as part of the pre-employment checks. These include all qualifications listed on the prospective employee's BRS application form. This check will be outlined in the job offer letter. Prospective employees must provide original certificates and copies will be made and held on the individual's HR file.
- **Teacher Prohibition check.** A teacher prohibition check is done when the applicant has Qualified Teacher Status and will be teaching trainees and young people Maths and English. The individual's consent must be gained before doing this.

### Other points to note:

- **Induction plan.** Every BRS new employee will have an induction plan drawn up by HR which will introduce them to the School, the staff, its objectives and goals. New Trustees will also have an induction.
- **Safeguarding.** In addition to an induction plan, every new BRS employee will be given a Safeguarding Induction Plan booklet which they are required to work through and sign when complete. The Designated Safeguarding Lead (DSL) will ensure this done.

New employees will also undertake Safeguarding and Prevent training. The Designated Safeguarding Lead (DSL) will organise this.

- **Code of Conduct.** All new staff must read the BRS Code of Conduct as well as the relevant sections of the current *Keeping Children Safe in Education* document. This will be included in the induction programme for new staff. They must sign to say they have read and understood the importance of the Code of Conduct. The Designated Safeguarding Lead (DSL) will ensure this done.
- **Staff Handbook.** All new staff must read the BRS Staff Handbook and sign the front sheet when read. This will be included in the induction programme for new staff.

The BRS Staff Handbook states that *it is a gross misconduct for an employee **NOT** to inform BRS senior management if they are cautioned or charged by the police for any criminal offence.* If any member of staff is unsure of how to proceed, they must talk to a member of the Senior Management Team, the Designated Safeguarding Lead or their Line Manager. All conversations of this nature will be treated with the utmost confidentiality.

- **New starter checklist.** HR will set up a personnel file for all new employees, self-employed positions and Trustees. On the front of each file will be a Safer Recruitment checklist which will prompt all of the above actions to be completed.
- **Self-employed positions.** Those working for the BRS on a self-employed basis must also comply with the BRS Safer Recruitment policy checks as follows:
  - Provide two satisfactory references
  - DBS check
  - Right to Work
  - ID check
  - Provide evidence of qualifications
  - Undertake Safeguarding and Prevent training
  - Understand the BRS Code of Conduct
  - Undertake a basic BRS induction

### **Additional checks for Senior Management appointments:**

- A Section 128 check will be completed for all new Trustee and Senior Management appointments.

A Section 128 check is a check (in addition to a Disclosure and Barring Service check) for those in management roles at independent schools, academies and free schools, to ensure they are not prohibited under Section 128 provisions. The Section 128 check, checks the names of individuals who have been barred from taking part in the management of any independent school (including academies and free schools), under the terms of a direction made by the Secretary of State for Education. This check can only be carried out if the individual gives his/her consent.

In order for a Section 128 check to be requested, the individual concerned must provide their consent, National Insurance number, date of birth, full name, including any previous names.

### **Additional checks for the appointment of a new Trustee and/or Chief Executive:**

Checks for Trustees and the appointment of a Chief Executive are normally carried out by the BRS Board of Trustees, but can also be carried out on behalf of the Board of Trustees by BRS HR.

The Chair of Trustees and co-trustees will ensure that they have procedures in place to check whether the person they are considering appointing as a Trustee or Chief Executive has been disqualified by law from acting in that role. The reasons for disqualification are outlined here:

Reasons for disqualification for Trustees and Chief Executives include:

- Disqualified as a company director;
- have an unspent conviction for an offence involving dishonesty or deception (such as fraud)
- are an undischarged bankrupt (or subject to sequestration in Scotland), or have a current composition or arrangement including an individual voluntary arrangement (IVA) with your creditors;
- have been removed as a trustee of any charity by the Commission (or the court) because of misconduct or mismanagement;
- are on the sex offenders' register.

Full details can be found in the Charity Commission booklet *Guidance: The essential trustee: what you need to know, what you need to do*

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/866947/CC3\\_feb20.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/866947/CC3_feb20.pdf)

- **Advertisements.** All trustee positions and those for Chief Executive, will be advertised on sites such as Careers in Racing <https://www.careersinracing.com/> Do It <https://doit.life/> NCVO <https://www.ncvo.org.uk/>. This is to ensure the vacancy attracts as wide a range of applications as possible. If a trustee is required to have a particular specialism, such as finance, horseracing or equality and diversity, the vacancy will be advertised on sites relevant to the vacancy as well as on the more general sites already mentioned.

- **Declaration.** Before appointing a Trustee or Chief Executive, the BRS Board of Trustees will obtain a declaration from the prospective Trustee or Chief Executive, that they are not disqualified from acting as a charity trustee. The BRS uses the Charity Commission’s Trustee Declaration form for this purpose. BRS HR has a copy of this form.  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/960027/Trustee\\_Declaration\\_Form\\_Fields\\_December\\_2020.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/960027/Trustee_Declaration_Form_Fields_December_2020.pdf)
- **Official Registers.** The BRS Board of Trustees will consult official registers which record the names of people who are disqualified from acting as charity trustees. These include:
  - (1) The [Individual Insolvency Register](#) maintained by the Insolvency Service, which contains details of:
    - bankruptcies that are either current or have ended in the last three months;
    - current individual voluntary arrangements and fast track voluntary arrangements;
    - current bankruptcy restriction orders and undertakings.
  - (2) The register of disqualified directors maintained by Companies House. Searches of the register can be made on the [Companies House website](#).
  - (3) The register of all persons who have been removed as a charity trustee either by the Charity Commission or by an Order of the High Court since 1 January 1993.
- **Section 128 check.** This check is required for all Trustee and Chief Executive appointments. Details of a Section 128 check are outlined above under the header ‘*Additional Checks for Senior Management Appointments*’.

**Other checks for Trustees, Chief Executive and Senior Management positions:**

- DBS check – outlined above
- All applicants must complete a BRS application form
- References. At least two references will be taken up.