

# SMARTPATH UK GUARDIANSHIP

## SAFER RECRUITMENT POLICY

### POLICY STATEMENT

SmartPath UK Guardianship is committed to safeguarding and promoting the welfare of children and young people at all times while they are under our care.

SmartPath UK Guardianship adheres to the principles of the statutory 'Safer Recruitment' guidance for schools, and the National Society for the Prevention of Cruelty to Children (NSPCC) 'Safer Recruitment' advice.

SmartPath UK Guardianship follows the Association for the Education and Guardianship of International Students (AEGIS) guidelines as part of an on-going accreditation process. This is to ensure our students receive the highest standards of homestay and care while under our guardianship.

SmartPath UK Guardianship is aware of additional sources of advice and guidance for the standards required for homestay recruitment including the British Council (Homestay guidelines and Codes of Practice), and the Department for Education Boarding Schools National Minimum Standards (September 2022).

This policy is supported by the most recent version of 'Keeping Children Safe in Education' part three. SmartPath UK Guardianship has a rigorous process for recruiting staff and homestays in accordance with the principles of 'Safer Recruitment'. This is from point of advertisement to post induction, with on-going monitoring and safeguarding reviews.

The Safer Recruitment policy aims to help to deter, reject, or identify people who might abuse children, or are otherwise unsuited to work with them. At every stage of the process, SmartPath UK Guardianship commitment to safeguarding and promoting the welfare of children is highlighted.

## AIMS OF THE POLICY

The aims of the policy are:

- To ensure that SmartPath UK Guardianship meets the commitment to safeguarding and promoting the welfare of children and young people, by carrying out all necessary pre-employment checks as part of the Safer Recruitment process
- To ensure that the best possible members of staff and homestays are recruited on their abilities and suitability for the advertised role in line with relevant legislation, recommendations and guidance
- To ensure that no applicant is treated unfairly on any grounds including race, colour, nationality, ethnicity or national origin, religion or religious belief, sex or sexual orientation, marital or civil partner status, disability or age. The recruitment and selection process will ensure the identification of the person best suited to the advertised role based on the applicant's abilities, qualifications, experience 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 as soon as they are aware of the individual's application and avoid any involvement in the recruitment and selection decision-making process.

## RECRUITMENT PROCEDURE FOR STAFF

### ADVERTISING A ROLE

SmartPath UK Guardianship plans the recruitment exercise to ensure that the recruitment panel are clear about the qualities, qualifications and experience needed by the successful candidate and whether there are any particular matters that need to be mentioned in the advertisement for the post. This is in order to prevent unwanted applications or ultimately an unsuitable appointment.

The job and person specification for each role form part of the pack sent to prospective candidates and set out the extent that the role involves working with children and young people, and the safeguarding responsibility involved.

Advertisements for roles make SmartPath UK Guardianship commitment to safeguarding clear by including the following statement: “SmartPath UK Guardianship is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share in this commitment”. There should also be reference to the responsibility for safeguarding and promoting the welfare of children in the job description.

SmartPath UK Guardianship advertisements also include the requirement for each applicant obtaining an enhanced Disclosure and Barring Service check from original identification documents and, where relevant, documents to prove their right to work in the UK. The advertisements also include details of the post, payments and qualities required to fulfil the role.

SmartPath UK Guardianship do not accept curriculum vitae (CV) drawn up by the applicant without an accompanying application form being submitted. This is because a CV presents only the information the applicant wishes to present and may omit relevant details. The application form details the safeguarding mission statement, the requirement for an applicant to have an enhanced DBS and for references to be sought prior to interview where possible. Completed application forms and accompanying CV's are stored securely on a confidential computer drive by director.

The director maintains the bank of job adverts securely and confidentially. The details are circulated via online advertising organisations which require applicants to submit expressions of interest together with their CV to the company.

## THE APPLICATION FORM

On receipt of expressions of interest and accompanying CVs, the DSL will screen initial submissions, and the application form will be sent to applicants who have the potential to meet the requirements of the job specification and person specification.

Through the application form, SmartPath UK Guardianship obtains the following information:

- full identifying details of the applicant including current and former names, date of birth, current address and National Insurance number;
- a statement of any academic and/or vocational qualifications that the applicant has obtained, relevant to the position for which s/he is applying, with details of the awarding body and date of award;
- a full history, in chronological order, since leaving secondary education, including periods of any post-secondary education/training, part-time and voluntary work as well as full time employment, with start and end dates along with explanations for periods not in employment, education or training and reasons for leaving employment;
- a declaration of any family or close relationship to existing employees or employers;
- details of referees. One referee should be the applicant's current or most recent employer. Normally, two referees should be sufficient. N.B. Where an applicant who is not currently working with children has done so in the past it is important that a reference is also obtained from the employer by whom the person was most recently employed with regard to their work with children. The form makes it clear that references will not be accepted from relatives or from people writing solely in the capacity of friends, and that references may be sought from previous employers on short listed candidates for information to verify particular experience or qualifications, before interview; and
- a statement of the personal qualities and experience that the applicant believes are relevant to his/her suitability for the post advertised and how s/he meets the person specification.

Where a role involves engaging in regulated activity relevant to children SmartPath UK Guardianship will make applicants aware on the application form that it is an offence to apply for the role if the applicant is barred from engaging in regulated activity relevant to children.

There will be a self-disclosure process introduced for short listed candidates to ensure the applicant has an opportunity to raise all information in a confidential way. Only shortlisted applicants will be asked to provide any information about unspent and unprotected criminal records. Short listed applicants will be asked to declare that they are not disqualified from working with children through the Disclosure and Barring Service's (DBS) Barring Lists, or

subject to sanctions imposed by a regulatory or professional body, and have no convictions, cautions or bind overs. Any disclosures can be discussed with them prior to or at interview (pending receipt of the completed enhanced DBS check).

If the applicant is currently working with children, on either a paid or voluntary basis, their current employer with children will be asked about disciplinary offences relating to children, including any in which the penalty is time-expired (that is where a warning could no longer be taken into account in any new disciplinary hearing for example) and whether the applicant has been the subject of any child protection concerns and, if so, the outcome of any enquiry or disciplinary procedure. If the applicant is not currently working with children but has done so in the past, that previous employer will be asked about those issues.

Providing false information may be an offence and could result in the application being rejected or summary dismissal if the applicant has been selected and possible referral to the police.

## THE JOB DESCRIPTION AND PERSON SPECIFICATION

Once a post becomes vacant, or a new post is created, the DSL will review the job description to ensure compliance with the Safer Recruitment guidance.

The job description will state the main duties and responsibilities of the post; and the individual's responsibility for promoting and safeguarding the welfare of children s/he is responsible for or comes into contact with. The extent of this responsibility will vary according to the nature of the post being advertised.

## THE PERSON SPECIFICATION

The Person Specification is supplementary information to the job description and lists essential and desirable criteria for the post, including experience, competencies and qualities that the successful candidate should be able to demonstrate. The Person Specification will explain how these requirements will be tested and assessed during the selection process. This document will be reviewed by the DSL to ensure compliance with the Safer Recruitment guidance.

The Person Specification will explain that the interview will explore issues relating to safeguarding and promoting the welfare of children including:

- motivation to work with children;
- ability to form and maintain appropriate relationships and personal boundaries with children;
- emotional resilience in working with challenging behaviours; and
- explain that if the applicant is short-listed any relevant issues arising from his/her references will be taken up at interview.

## THE APPLICATION INFORMATION PACK

In addition to the application form, an information pack is sent to applicants. The pack will contain:

- The application form
- The job description and person specification
- Requirement to complete an enhanced DBS Disclosure
- SmartPath UK Guardianship will seek references and may approach previous employers for information and verification of experience or qualifications
- Safeguarding and Child Protection Policy statement
- A statement of the terms and conditions relating to the post
- Information about the applicant's current employer being contacted and asked about any disciplinary offences or relevant information relating to children, where the applicant is currently working with children on a paid or voluntary basis (including expired offences).

## SCRUTINISING AND SHORTLISTING APPLICATIONS

Two members of staff are responsible for scrutinising applications and short-listing candidates. At least one member of the panel is Safer Recruitment trained.

All applications are checked to ensure they are fully and properly completed, that the information is consistent, does not contain any discrepancies and to ensure that any gaps in employment are identified.

As per the Safer Recruitment guidance, incomplete application forms will not be accepted and will be returned to the applicant for completion.

Any gaps in employment will be noted and considered during the short-listing process. In addition, reasons for any repeated changes of employment without a clear career or salary progression, or a mid-career move from a permanent post to supply teaching or temporary work will also be explored and verified.

All applicants will be assessed equally against the criteria contained in the person specification without exception or variation and without unlawful discrimination.

Shortlisted candidates will be asked to complete a self-declaration of their criminal record or information that would make them unsuitable to work with children. Self-declaration is subject to Ministry of Justice guidance on the disclosure of criminal records; further information can be found on GOV.UK. SmartPath UK Guardianship will ask staff to complete a self-declaration on an annual basis thereafter to ensure that the information remains up to date. Should the circumstances of any member of staff change in the meantime, it is their responsibility to inform the guardianship organisation immediately.

All shortlisted candidates will be informed that online searches will be undertaken.

A copy of the interview form is kept on the personnel file.

## ONLINE SEARCH

SmartPath UK Guardianship will carry out an online search as part of their due diligence on the shortlisted candidates. This may help identify any incidents or issues that have happened, and are publicly available online, which we might want to explore with the applicant at interview. All shortlisted candidates will be informed that online searches will be undertaken.

## REFERENCES

SmartPath UK Guardianship seeks references for each application to obtain objective and factual information to support appointment decisions. References will always be sought and obtained directly from the referee with comments requested on work, professional competence and personal qualities. In the case of a potential member of staff, references will be requested from the candidate's current employer if an applicant is currently employed. References will always be obtained in writing.

Referees are asked to comment on the applicant's suitability to work with children, to outline any concerns about the applicant working with children or any disciplinary details.

'To whom it may concern' references are not accepted by SmartPath UK

Guardianship to reduce the risk of making an appointment decision on a forged reference.

Where (due to operational need) a reference is secured over the telephone in the first instance a record must be made of the telephone reference. Following this initial record, the reference will be obtained in writing as soon as practicable to provide a record of the information obtained from the referee.

Where electronic references are received, SmartPath UK Guardianship will ensure they originate from a legitimate source.

Once the references have been received, SmartPath UK Guardianship will verify the source of the reference. If concerns are raised within the reference, SmartPath UK Guardianship will address these by telephoning the referee, providing an opportunity for SmartPath UK Guardianship to ask any further questions where required. A log of the call will be placed on file. The references will be retained on file for the duration of contract/employment and then an agreed period afterward, normally 5 -7 years.

SmartPath UK Guardianship is required to check that information provided in references is not contradictory or incomplete. On receipt, references will be checked to ensure that all specific questions have been answered satisfactorily. The referee will be contacted to provide further clarification as appropriate, for example if the answers are vague or if insufficient information is provided. They will also be compared for consistency with the information provided by the candidate on their application form. Any discrepancies will be taken up with the candidate.

Any offer of employment will always be conditional on the receipt of satisfactory references.

#### INVITATION TO INTERVIEW

In addition to the arrangements for interviews – time and place, directions to the venue, membership of the interview panel – the invitation will remind candidates about how the interview will be conducted and the areas it will explore including suitability to work with children. Enclosing a copy of the person specification can usefully draw attention to the relevant information.

The invitation will also stress that the identity of the successful candidate will need to be checked thoroughly to ensure the person is who he or she claims to be, and that where an

enhanced DBS Disclosure is appropriate the person will be required to complete an application for a DBS Disclosure straight away. Consequently all candidates will be instructed to bring with them documentary evidence of their identity that will satisfy the requirements when applying for an enhanced DBS i.e. either a current driving licence or passport including a photograph, or a full birth certificate, plus a recent document (within the last three months) such as a utility bill or financial statement that shows the candidate's current name and address and where appropriate change of name documentation. In addition, where the candidate needs permission to work in the UK, they must produce this documentation at the interview for checking and verification.

Candidates will also be asked to bring documents confirming any educational and professional qualifications that are necessary or relevant for the post, e.g. the original or a certified copy of a certificate, or diploma, or a letter of confirmation from the awarding body. If the successful candidate cannot produce original documents or certified copies, written confirmation of his or her relevant qualifications will be obtained from the awarding body.

A copy of the documents used to verify the successful candidate's identity, right to work and required qualifications will be kept for the personnel file.

Wherever possible, SmartPath UK Guardianship will obtain references for short-listed candidates prior to the interview. If candidates ask that references are not sought prior to interview, any provisional offer of employment will be subject to satisfactory references being obtained.

## INTERVIEWS

The interview will be conducted by at least two people who will have met before the interview to agree the required standard for the role, consider the issues to be explored with each candidate and how the interview will be conducted. At least one of the two people on the interview panel must be Safer Recruitment trained.

Two interviewers allow for one interviewer to observe and assess the candidate while the other interviewer makes notes using the pre-planned competency-based question set. This reduces the possibility of any dispute about what was said or asked during the interview.

The panel will agree the questions they will ask candidates during the interview, the issues that may have been identified in the application form and references that may need exploring. This will include:

- the candidate's attitude toward children;
- their ability to support the organisation's agenda for safeguarding and promoting the welfare of children;
- gaps in the candidate's employment history;
- concerns or discrepancies arising from the information provided by the candidate and/or a reference; and
- the panel will also ask the candidate if they wish to declare anything in light of the requirement for an enhanced DBS check.

The panel will record the interview on the SmartPath UK Guardianship Interview Form.

If, for whatever reason, references are not obtained before the interview, the candidate will also be asked at interview if there is anything they wish to declare or discuss in light of the questions that have been (or will be) put to their referees. It is vital that the references are obtained and scrutinised before a person's appointment is confirmed and before they start work.

The interview process will ask the candidate to produce original documentation of any educational or professional qualifications that are necessary or relevant to the post. If the candidate is not able to produce the certificates, written confirmation of his or her relevant qualifications must be obtained from the awarding body.

A copy of the documents used to verify the candidate's identity, right to work in the UK and qualifications must be kept for the personnel file. These will be checked, signed and dated by the verifier. Confirmation that these documents have been inspected will be recorded on the recruitment form.

A copy of the interview form is kept on the personnel file.

## CONDITIONAL OFFER OF APPOINTMENT

The appointment of the successful candidate will be conditional upon the receipt of at least two satisfactory references (for further details see information above), proof of identification, proof of right to work in the UK (if appropriate), an enhanced DBS check, verification of qualifications where they are a requirement of the post and the completion of any probationary period.

SmartPath UK Guardianship will follow relevant DBS guidance if a check reveals information that a candidate has not disclosed in the course of the selection process.

Enhanced DBS checks will always be followed up where the results are unsatisfactory or there are discrepancies in the information provided.

Where the candidate is found to be disqualified from working with children by a court; or an applicant has provided false information in, or in support of, his or her application; or there are serious concerns about an applicant's suitability to work with children, the facts must be reported to the relevant authorities, such as the DBS or the Police by the DSL.

Advisory-please delete if checks are not undertaken. SmartPath UK Guardianship requests all staff and Homestays complete a medical declaration on appointment. This information will be kept confidentially and securely.

## FURTHER DETAILS ON PRE-APPOINTMENT VETTING CHECKS SMARTPATH UK GUARDIANSHIP UNDERTAKES

All offers of appointment are conditional until satisfactory completion of the mandatory pre-employment checks. SmartPath UK Guardianship will:

- verify a candidate's identity, it is important to be sure that the person is who they claim to be, this includes being aware of the potential for individuals changing their name. Best practice is checking the name on their birth certificate, where this is available. Further identification checking guidelines can be found on the GOV.UK website.
- obtain (via the applicant) an enhanced DBS check (including children's barred list information, for those who will be engaging in regulated activity with children). When using the DBS update service SmartPath UK Guardianship will still need to view the original physical certificate. Original physical certificates must be seen by the guardianship organisation before a candidate commences work. A record of the certificate date, type and number will be

retained and recorded on the single central record of appointments. Copies of DBS certificates and records of criminal information disclosed by the candidate are covered by UK GDPR/DPA 2018 Article 10. SmartPath UK Guardianship complies with the requirements of the Data Protection Act 2018. We will only retain a copy of a DBS, where there is a valid reason for doing so and it will not be kept for longer than six months.

- verify the candidate's mental and physical fitness to carry out their work responsibilities. Keeping Children Safe in Education explains that a job applicant can be asked relevant questions about disability and health in order to establish whether they have the physical and mental capacity for the specific role.
- verify that any member of staff acting as an educational guardian holds British citizenship or settled status.
- SmartPath UK Guardianship will check whether the member of staff acting as an educated guardian:
  - o has been convicted of a criminal offence in the UK or overseas for which they have received a custodial sentence of 12 months or more
  - o is a persistent offender who shows a particular disregard for the law
  - o has committed a criminal offence, or offences, which caused serious harm

If any of these apply, SmartPath UK Guardianship will be unable to appoint the member of staff.

SmartPath UK Guardianship will consider refusing the appointment of an educational guardian where the individual:

- o has been convicted of a criminal offence in the UK or overseas for which they have received a custodial sentence of less than 12 months
- o has been convicted of a criminal offence in the UK or overseas for which they have received a non-custodial sentence or received an out-of-court disposal that is recorded on their criminal record.

- verify the person's right to work in the UK, including EU nationals. If there is uncertainty about whether an individual needs permission to work in the UK, SmartPath UK Guardianship will follow the advice on the GOV.UK website.
- if the person has lived or worked outside the UK, make any further checks the guardianship organisations consider appropriate and,
- verify professional qualifications, as appropriate.
- ask short listed candidates to complete a self-declaration. Only shortlisted applicants will be asked to provide any information about unspent and unprotected criminal records.

## POST APPOINTMENT: INDUCTION

Newly appointed staff members must have an induction programme to complete, regardless of previous experience. The induction programme includes policy and procedure training, details of the support available for individuals in their new role, confirmation of agreement to abide by the Staff Code of Conduct and provides opportunities for new staff members to discuss any issues or concerns through 1:1 meetings with their line manager.

The content and nature of the induction will vary according to the role and previous experience of the new member of staff, however, it will always include the safeguarding policy, safeguarding response to children who go missing from education, behaviour policy (which should include measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying), staff and homestay code of conduct, how to report concerns, low level concerns policy, whistle-blowing policy and with whom they should discuss any concerns about their role or responsibilities. The induction programme will contain child protection training. All staff who work directly with children will be asked to read Keeping Children Safe in Education Part One. Those who do not work directly with children will be asked to read Keeping Children Safe in Education Annex A.

The line manager of the newly appointed staff member will report any concerns or issues about a person's ability or suitability for the role at the outset and address these immediately.

## MAINTAINING A SAFER CULTURE

SmartPath UK Guardianship recognises the need for continued awareness of safeguarding issues. Staff receive appropriate training and induction to ensure that they understand their

roles and responsibilities and are confident in carrying them out. Staff receive regular safeguarding and child protection updates from DSL. Staff, parents, students and partners are encouraged to report any issues or concerns about the safety or welfare of children, and that they will be listened to and taken seriously.

## RECRUITMENT PROCEDURE FOR HOMESTAYS

### PLANNING AND ADVERTISING

The homestay advertisement (which includes our mission statement, specific reference to safeguarding and suitability to work with children) is circulated in accordance with homestay targets in areas of need via online advertising agents such as Google PPC campaigns and print publications to identify the suitable homestay candidates in appropriate areas.

### APPLICATION FORM AND APPLICATION PACK

The homestay responds to the advertisement by completing an online enquiry form. Applicants must be over 25 years of age and be suitable to work with children.

On receipt of the enquiry form the homestay applicant is sent an online application which obtains relevant details for the role.

Where a role involves engaging in regulated activity relevant to children SmartPath UK Guardianship will make applicants aware on the application form that it is an offence to apply for the role if the applicant is barred from engaging in regulated activity relevant to children.

Instructions on the form include explanatory notes about completing the form, links to the job description and person specification, SmartPath UK Guardianship Safeguarding and Child Protection Policy and a statement of the terms and conditions relating to the post.

The Application Form outlines the requirement for the applicants (including members of the homestay aged 16 and over and all other temporary residents) to complete an enhanced Disclosure (including children's barred list information, for those who will be engaging in regulated activity with children). The applicant will be required to provide evidence (i.e. original documents) of their identification to the staff interviewer during the initial inspection for verification.

Enhanced DBS checks are required for all members of the homestay aged 16 and over and any individual who stays regularly with the homestay. If any family members are studying at university but come back during the holidays when students will be hosted, then they will also need a DBS check.

The application form will explain how SmartPath UK Guardianship may contact the Local Authority to check if they know of any reason why the candidate may be unsuitable to host children.

The application form will explain how the primary carer in the homestay will be required to complete a declaration on behalf of the household that provides information on their suitability to work with children. Alternatively, each household member could complete an individual self-declaration. Self-declaration is subject to Ministry of Justice guidance on the disclosure of criminal records, further information can be found on GOV.UK

## THE JOB DESCRIPTION AND PERSON SPECIFICATION

Once a post becomes vacant or a new post is created, the DSL will review the job description to ensure compliance with the Safer Recruitment guidance and confirmation that the main duties and responsibilities are outlined. This will include the responsibility for safeguarding the students that the homestay is responsible for.

The Person Specification is supplementary information to the job description and lists essential and desirable criteria (for example qualifications, experience, competences and qualities) for the post. This document will be reviewed by the DSL to ensure compliance with the Safer Recruitment guidance.

## SCRUTINISING AND SHORT LISTING

When the application form is submitted, the director scrutinises the form to ensure it is fully and properly completed, applicants are in the right homestay area for the students and are suitable for the initial inspection and interview stage.

All candidates are assessed equally against the criteria contained in the person specification without exception or variation and without unlawful discrimination.

There is a disclosure process for short listed candidates to ensure the applicant has an opportunity to raise all information in a confidential way. Disclosure forms are completed

individually by all members of the homestay aged 16 and over. Only shortlisted applicants will be asked to provide any information about unspent and unprotected criminal records. Short listed applicants will be asked to declare that they are not disqualified from working with children through the Disclosure and Barring Service's (DBS) Barring Lists, or subject to sanctions imposed by a regulatory or professional body, and have no convictions, cautions or bind overs. Any disclosures can be discussed with them prior to or at interview (pending receipt of the completed enhanced DBS check). SmartPath UK Guardianship will ask homestays to complete declaration forms on an annual basis to ensure that information remains up to date. Should the circumstances of any member of the homestay change in the meantime, it is the homestays' responsibility to inform the guardianship organisation immediately.

All shortlisted candidates will be informed that online searches will be undertaken.

#### ONLINE SEARCH

SmartPath UK Guardianship will carry out an online search as part of their due diligence on potential homestays. This may help identify any incidents or issues that have happened, and are publicly available online, which we might want to explore with the applicant at interview. All potential homestays will be informed that online searches may be undertaken.

#### REFERENCES

Homestay references for the primary carer/s are requested prior to interview. This is to obtain objective and factual information to support appointment decisions. As a minimum, one personal and one professional reference must be obtained for each primary carer, or one professional reference for each primary carer with one joint personal reference. The homestay must provide written permission to confirm these references can be sought. References will always be obtained in writing.

When the application form is submitted the applicant must nominate referees who they have known in a professional and personal capacity, with the personal referee having known the applicant for a minimum of two years.

Referees are asked to comment on work, professional competence and personal qualities. Referees are asked to comment on the applicant's suitability to work with children, to outline any concerns about the applicant working with children or any disciplinary details.

References which are submitted online are reviewed to ensure we have obtained independent professional and character references that answer specific questions. This helps to assess an applicant's suitability to work with children and follow up any concerns.

'To whom it may concern' references are not accepted by SmartPath UK Guardianship to reduce the risk of making an appointment decision on a forged reference.

Where (due to operational need) a reference is secured over the telephone in the first instance a record must be made of the telephone reference. Following this initial record, the reference will be obtained in writing as soon as practicable to provide a record of the information obtained from the referee.

Where electronic references are received, SmartPath UK Guardianship will ensure they originate from a legitimate source.

Once the references have been received, SmartPath UK Guardianship will verify the information given in the reference. If concerns are raised within the reference, SmartPath UK Guardianship will address these by telephoning the referee, providing an opportunity for SmartPath UK Guardianship to ask any further questions where required. A log of the call will be placed on file. The references will be retained on file for the duration of contract/employment and then an agreed period afterward, normally 5 -7 years.

SmartPath UK Guardianship is required to check that information provided in references is not contradictory or incomplete. On receipt, references will be checked to ensure that all specific questions have been answered satisfactorily. The referee will be contacted to provide further clarification as appropriate, for example if the answers are vague or if insufficient information is provided. They will also be compared for consistency with the information provided by the candidate on their application form. Any discrepancies will be taken up with the candidate.

Any offer of employment will always be conditional on the receipt of satisfactory references.

## INTERVIEWS AND INITIAL VISITS

For applicants who are short listed, they will arrange the initial visit. The invitation for the initial visit and interview will stress that the successful candidate will need to be checked thoroughly in terms of identification and the completion of an enhanced DBS check. This will require the candidate to provide to the interviewer documentary evidence of their identity (for example current driving licence, passport, full birth certificate, plus documents for example a recent utility bill or financial statement that shows the candidate's full name and address). Where a candidate has changed their name, full documentation must be provided detailing the previous name and current name.

The homestay applicant is advised and given instructions on how to prepare for the identification and enhanced Disclosure and Barring Service Check during the visit.

During the initial visit, the staff member interviews the applicants face to face to confirm suitability for the role and suitability to work with children.

The staff interviewer inspects the house, garden and any car which will be used to transport students and secures photographs of the property (including individual rooms).

The staff interviewer is encouraged to discuss the homestay's previous employment history and experience, and to note any indications that the primary carers may not have the health and/or physical capacity for the role, together with the applicant's right to work in the UK where appropriate. The interviewer must check and verify the documents used to verify an applicant's identity, right to work in the UK and/or qualifications (where appropriate), as per the instructions on Online DBS. Permission is sought to retain a copy of the documents used to verify homestay identity, right to work and required qualifications. These will be kept on the personnel file.

The staff interviewer will keep a written record of the interview, and these will be stored in the homestay personnel file.

## SCOPE OF THE INTERVIEW

The interviewer will assess and evaluate the applicant's suitability for being a SmartPath UK Guardianship homestay, their motivation for working with children and young people, and their

ability to support the company aims and principles. There is scope on the visit form to record this detail which will be submitted to the Head Office for assessment.

The interviewer is encouraged to ask the applicants aged 16 or over in the homestay if they wish to declare anything in light of the requirement for an Enhanced DBS disclosure.

Where references have not been returned to Head Office before an interview, the prospective homestay can be asked at interview if there is anything they wish to declare or discuss in light of the questions that have been or will be put to their referees.

### CONDITIONAL OFFER OF APPOINTMENT AND DBS CHECKS

The successful applicants will be conditionally accepted pending references, proof of identification, proof of right to work in the UK (if appropriate), an enhanced DBS check (including children's barred list information, for those who will be engaging in regulated activity with children), verification of qualifications where they are a requirement of the post and the completion of any probationary period.

As part of the vetting process, SmartPath UK Guardianship may contact the Local Authority to check if they know of any reason why the candidate may be unsuitable to host children. We make all candidates aware of this on our application form.

### FURTHER DETAILS ON PRE-APPOINTMENT VETTING CHECKS SMARTPATH UK GUARDIANSHIP UNDERTAKES

All offers of appointment are conditional until satisfactory completion of the mandatory pre-employment checks. SmartPath UK Guardianship will:

- verify a candidate's identity, it is important to be sure that the person is who they claim to be, this includes being aware of the potential for individuals changing their name. Best practice is checking the name on their birth certificate, where this is available. Further identification checking guidelines can be found on the GOV.UK website.
- obtain (via the applicant) an enhanced DBS check (including children's barred list information, for those who will be engaging in regulated activity with children). When using the DBS update service SmartPath UK Guardianship will still need to view the original physical certificate. Original physical certificates must be seen by the guardianship organisation before

a candidate commences work. A record of the certificate date, type and number will be retained and recorded on the single central record of appointments. Copies of DBS certificates and records of criminal information disclosed by the candidate are covered by UK GDPR/DPA 2018 Article 10. SmartPath UK Guardianship complies with the requirements of the Data Protection Act 2018. We will only retain a copy of a DBS, where there is a valid reason for doing so and it will not be kept for longer than six months.

- verify the candidate's mental and physical fitness to carry out their work responsibilities. Keeping Children Safe in Education explains that a job applicant can be asked relevant questions about disability and health in order to establish whether they have the physical and mental capacity for the specific role;
- verify that the homestay holds British citizenship or settled status.
- SmartPath UK Guardianship will check whether the intended homestay primary carer, or anyone regularly living with the intended nominated homestay:
  - o has been convicted of a criminal offence in the UK or overseas for which they have received a custodial sentence of 12 months or more
  - o is a persistent offender who shows a particular disregard for the law
  - o has committed a criminal offence, or offences, which caused serious harm

If any of these apply, SmartPath UK Guardianship will be unable to appoint the homestay.

SmartPath UK Guardianship will consider refusing the appointment of a homestay where the homestay primary carer or anyone regularly living in the homestay home:

- o has been convicted of a criminal offence in the UK or overseas for which they have received a custodial sentence of less than 12 months
- o has been convicted of a criminal offence in the UK or overseas for which they have received a non-custodial sentence or received an out-of-court disposal that is recorded on their criminal record.
- verify the person's right to work in the UK, including EU nationals. If there is uncertainty about whether an individual needs permission to work in the UK, SmartPath UK Guardianship will follow the advice on the GOV.UK website;

- an overseas check will be undertaken if a member of staff, volunteer or homestay member has lived or worked abroad for more than 3 months in the last five years.; and,
- verify professional qualifications, as appropriate.

#### POST APPOINTMENT: INDUCTION

Newly appointed homestays are provided with a Homestay Handbook which contains guidance and advice for the role of homestay. The Safeguarding and Child Protection Policy is also made available to the homestay, as is Child Protection Training.

Homestays have on-going support from the Head Office Guardianship Team (DSL/DDSL) and their Local Coordinator regardless of their experience of the homestay role.

#### POST APPOINTMENT: ON-GOING TRAINING AND MONITORING

SmartPath UK Guardianship homestays receive emails containing updates and safeguarding news. This is to ensure that guidance is regularly circulated and homestays have continual access to Safeguarding Training and regular NSPCC Safeguarding and Child Protection updates.

The homestay's initial visits and annual revisit process provides SmartPath UK Guardianship with the infrastructure to continually monitor the quality of homestays. These visits check that the highest standards are afforded to our students. Written records of annual visits will be stored in the homestay personnel file.

Homestays must inform SmartPath UK Guardianship of any changes to their circumstances. This includes changes to DBS status and any changes to who is living in the household (whether members have moved in or out).

#### FURTHER INFORMATION ABOUT TEMPORARY VISITORS/ OTHER STUDENTS

Homestays are required to inform us in advance when they have a temporary overnight visitor staying at the same time as hosting one of our students.

Where there is an overseas student staying with a UK homestay via a private arrangement or through another Guardianship Organisation, an enhanced DBS check will not be required, although homestays must inform us that they are hosting additional students.

## MONITORING AND REVIEW

Monitoring of both the recruitment process and induction arrangements will allow for future recruitment practices to be better informed.

The reviews will cover:

- staff turnover and reasons for leaving;
- exit interviews;
- attendance of new recruits at child protection training.

## REVIEW

We are committed to reviewing our policy and good practice annually.

*This policy was last reviewed In January 2026 by Limin Chen.*