



## **Sexual Exploitation Policy**

Turning Heads directors are responsible for ensuring that those benefiting from us or working with us are not harmed in any way. The directors of Turning Heads have a legal duty to act prudently and this means that they must take all reasonable steps within their power to ensure that no one is harmed. It is particularly important where beneficiaries are vulnerable persons or children in the community.

This policy applies to all those involved in Turning Heads, including, but not exclusively, administrators, volunteer drivers, parents, young people, and third party suppliers.

Turning Heads is committed to safeguarding and promoting the welfare of all people in its care. As an employer, Turning Heads expects all staff and volunteers to share this commitment.

The aims of the Safer Recruitment policy is to help deter, reject or identify people who might abuse attendees or are otherwise unsuited to working with them by having appropriate procedures for appointing staff.

### **The aims of the recruitment policy are as follows:**

- to ensure that the best possible staff are recruited on the basis of 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, colour, nationality, ethnic or national origin, 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 the statutory guidance published by the Department for Education (DfE), Keeping Children Safe in Education - September 2020 (KCSIE), the Prevent Duty Guidance for England and Wales 2015 (the Prevent Duty Guidance) and any guidance or code of practice published by the Disclosure and Barring Service (DBS); and

- to ensure that Turning Heads meets its commitment to safeguarding and promoting the welfare of everyone by carrying out all necessary pre-employment checks. Employees involved in the recruitment and selection of staff are responsible for familiarising themselves with and complying with the provisions of this policy.

### **Roles of the Trustees**

It is the responsibility of the trustees to:

- Ensure Turning Heads has effective policies and procedures in place for recruitment of all staff and volunteers and meets its legal requirements.
- Monitors compliance with them.

It is the responsibility of the trustees to:

- Ensure that Turning Heads operates safe recruitment procedures and makes sure all appropriate checks are carried out on all staff and volunteers who work. To monitor contractors' and agencies' compliance with this document.
- Promote welfare of attendees at every stage of the procedure.

### **Definition of Regulated Activity and Frequency**

Any position undertaken at, or on behalf of Turning Heads will amount to "regulated activity" if it is carried out:

- frequently, meaning once a week or more; or
- overnight, meaning between 2.00am and 6.00am; or
- satisfies the "period condition", meaning four times or more in a 30-day period; and
- provides the opportunity for contact with children. Roles which are carried out on an unpaid/voluntary basis will only amount to regulated activity if, in addition to the above, they are carried out on an unsupervised basis.

Turning Hesds is not permitted to check the Barred List unless an individual will be engaging in "regulated activity". Turning Heads is required to carry out an enhanced DBS check for all staff, supply staff and trustees who will be engaging in regulated activity. However, Turning Heads can also carry out an enhanced DBS check on a person who would be carrying out regulated activity but for the fact that they do not carry out their duties frequently enough i.e. roles which would amount to regulated activity if carried out more frequently

## **Recruitment and Selection Procedure**

To ensure equality of opportunity, Turning Heads will advertise all vacant posts to encourage as wide a field of applicant as possible, normally this entails an external advertisement. Any advertisement will make clear the commitment to safeguarding and promoting the welfare of children and adults. All documentation relating to applicants will be treated confidentially in accordance with the Data Protection Act (DPA18).

**Application Forms:** Turning Heads uses its own application form and all applicants for employment will be required to complete an application form containing questions about their academic and full employment history and their suitability for the role (in addition all applicants are required to account for any gaps or discrepancies in employment history).

Applicants submitting an incomplete application form will not be shortlisted. The application form will include the applicant's declaration regarding convictions and working with children, and will make it clear that the post is exempt from the provisions of the Rehabilitation of Offenders Act 1974. CVs will be accepted. It is unlawful for Turning Heads to employ anyone who is barred from working with children or adults

It is a criminal offence for any person who is barred from working with children or adults to apply for a position at Turning Heads. All applicants will be made aware that providing false information is an offence and could result in the application being rejected, or summary dismissal if the applicant has been selected, and referral to the police and/or the DBS.

**References:** References for the successful candidate(s) will be requested after interview. All offers of employment will be subject to the receipt of a minimum of two references which are considered satisfactory by Turning Heads. One of the references must be from the applicant's current or most recent employer.

The referee should not be a relative. References will always be sought and obtained directly from the referee and their purpose is to provide objective and factual information to support appointment decisions. All referees will be asked whether they believe the applicant is suitable for the job for which they have applied and whether they have any reason to believe that the applicant is unsuitable to work with children or adults. Referees will also be asked to confirm that the applicant has not been radicalised, so that they do not support terrorism or any form of "extremism". Please note that no questions will be asked about health or medical fitness prior to any offer of employment being made. Any discrepancies or anomalies will be followed up. Direct contact by phone will be undertaken with each referee to verify the reference.

Turning Heads does not accept open references, testimonials or references from relatives.

**Interviews:** There will be a face-to-face interview wherever possible, and a minimum of two interviewers will see the applicants for the vacant position. The interview process will explore

the applicant's ability to carry out the job description and meet the person specification. It will enable the panel to explore any anomalies or gaps which have been identified in order to satisfy themselves that the chosen applicant can meet the safeguarding criteria (in line with Safer Recruitment Training). Any information in regard to past disciplinary action or allegations, cautions or convictions will be discussed and considered in the circumstance of the individual case during the interview process, if it has been disclosed on the application form. At least one member of any interviewing panel will have undertaken safer recruitment training or refresher training as applicable. All applicants who are invited to an interview will be required to bring evidence of their identity, address and qualifications. Original documents will only be accepted and photocopies will be taken. Unsuccessful applicant documents will be destroyed 6 months after the recruitment programme.

Offer of appointment and New Employee Process: Any offer of employment following the formal interview, any such offer will be conditional on the following:

- the agreement of a mutually acceptable start date and the signing of a contract incorporating Turning Heads standard terms and conditions of employment
- verification of the applicant's identity (if not previously been verified)
- the receipt of two references
- where the position amounts to "regulated activity" the receipt of an enhanced disclosure from the DBS which Turning Heads considers to be satisfactory
- where the position amounts to "regulated activity" confirmation that the applicant is not named on the Children's or adults Barred List
- any further checks which are necessary as a result of the applicant having lived or worked outside of the UK;

### **The Rehabilitation of Offenders Act 1974**

The Rehabilitation of Offenders Act 1974 does not apply to positions which involve working with, or having access to learners. Therefore, any convictions and cautions that would normally be considered 'SPENT' must be declared when applying for any position at Turning Heads.

DBS ( Disclosure and Barring Service) Check. Turning Heads applies for an enhanced disclosure from the DBS in respect of all positions which amount to "regulated activity" as defined in the Safeguarding Vulnerable Groups Act 2006 (as amended). The purpose of carrying out an Enhanced Check for Regulated Activity is to identify whether an applicant is barred from working with children or adults. It is Turning Heads policy that the DBS disclosure must be obtained before the commencement of employment of any new employee.

Turning Heads does not discriminate on the grounds of age. Where an applicant claims to have changed their name by deed poll or any other means (eg marriage, adoption, statutory declaration) they will be required to provide documentary evidence of the change.

Turning Heads is legally required to undertake the above pre-employment checks. Therefore, if an applicant is successful in their application, Turning Heads will retain on their personnel file any relevant information provided as part of the application process. This will include copies of documents used to verify identity, right to work in the UK, medical fitness and qualifications. Medical information may be used to help to discharge its obligations as an employer, eg so that Turning Heads may consider reasonable adjustments if an employee suffers from a disability or to assist with any other workplace issue. This documentation will be retained for the duration of the successful applicant's employment. All information retained on employees is kept centrally in a locked and secure cabinet.

All interview notes on all unsuccessful applicants for a period of 6 months, after which time the notes will be confidentially destroyed (ie shredded). The 6-month retention period is in accordance with the General Data Protection Regulations (GDPR).

*Name:* Alan Tilley

*Reviewed:* 2<sup>nd</sup> January 2022

*Next Review:* 2<sup>nd</sup> January 2024

*Signed:* *Alan Tilley*

*Date :* 2<sup>nd</sup> January 2022