

Vetting Procedure

This procedure implements the Recruitment Policy and ensures there is a thorough and robust vetting procedure in place across the organisation.

BACKGROUND

As directed by the Safer Recruitment and Selection in Education Settings Good Practice Guidelines, Young Epilepsy is committed to safeguarding and promoting the welfare of children and young people and adults at risk and expects all staff to share this commitment.

Young Epilepsy's recruitment and selection processes help to deter, reject or identify people who might harm children or young adults, or are otherwise unsuited to work with them so we are able to strengthen safeguards for children and young people.

Every effort has been taken to ensure the revisions made in this review process are in line with the relevant legislation, including:

- Disclosure and Barring Service (DBS) Code of Practice
- Protection of Freedoms Act 2012
- National Minimum Standards under Section 23(1) of the Care Standards Act.
- Safeguarding Children – Safer Recruitment and Selection in Education Settings (DfES)
- Department of Health Protection of Vulnerable Adults Scheme
- Independent Safeguarding Authority (ISA) Scheme
- The Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (Amendment) (England and Wales) Order 2013
- The Children's Act 1989
- Police Act 1997
- Care Standards Act 2000
- Health and Social Care Act 2008

Interview processes follow safer recruitment recommendations and one member of every interview panel will have been trained in 'Safer Recruitment'.

Young Epilepsy will pre-screen all prospective employees, including trustees, governors, casual bank staff and volunteers, employing appropriate and reasonable measures to confirm their suitability for working with the children and young adult's workforce. All offers of employment will be conditional upon satisfactory completion of pre-employment checks.

This will equally apply to self-employed contractors, consultants, and agency workers or any work experience candidates, internships, and apprentices (over 16 years of age).

No prospective employees will commence employment until all vetting checks have been completed satisfactorily; unless in exceptional circumstances as detailed in the Risk Assessment form where express permission has been obtained from the Head

of Service, Director of Service and Director of Human Resources and a full Risk Assessment has been completed. It is the responsibility of the person completing and signing the risk assessment form to ensure that the risk assessment and safety actions are adhered to.

PROCEDURE

Summary of required pre-employment checks

Young Epilepsy carry out or will work with our outsourced vetting company Procius to ensure the following checks are completed.

An offer of appointment to the successful applicant will be conditional on:

- Application Form fully completed via the online application on iTrent.
- A 'Personal Statement' form to be fully completed to verify any gaps or discrepancies in employment history.
- A written statement of declaration to be completed to verify any convictions, cautions, bind over's or reprimands in line with Young Epilepsy's vetting policy and Rehabilitation and Offenders Act, or if they are or have ever been, subject to any police investigation and/or prosecution in the UK or any other country.
- Verification of applicant's proof of 'Right to work in the UK' or proof of 'Entitlement to work in the UK' if not a national of a European Economic Area Country.
- Identity checks against passport/driving licence (new photo-type)/photo ID.
- Entitlement to work under Asylum & Immigration Act.
- Professional qualification or memberships/PIN numbers/registration checks.
- Health declaration / medical reference (if applicable)
- A minimum of two written references are required from current and previous employers/work placements/education/volunteering, which will be verbally verified wherever possible, validating continuous employment/work placements/education/volunteering over the last five years*.
- Enhanced DBS Police Disclosure Check.
- Certificate of Good Conduct (if applicable)
- Young Epilepsy will request a reference where reasonably practical from the most recent employer for all applicants shortlisted for interview for a position in school or college prior to interview*.

Advertisements

All external advertisements will contain a statement that an enhanced DBS check will be required in respect of the vacant post.

Recruitment materials and the Young Epilepsy website will contain the following statement:

“We are committed to safeguarding and promoting the welfare of children and young people. An enhanced Disclosure and Barring Service check will be required.

Young Epilepsy strives to employ people that reflect the community it serves; therefore applications from minority groups and people with disabilities are particularly welcomed.”

Application forms for all prospective employees

All applicants will be expected to complete a Young Epilepsy Application Form via iTrent and any associated forms prior to interview. If this is not possible it will be completed as part of the vetting process and we reserve the right to withdraw the application if this is not complied with.

The form(s) requires the following information to be given:

- Full candidate history from leaving full time education
- Clarification on all Education / Professional Qualifications including any professional registration and PIN numbers.
- Proof of right to work in the UK (or proof of entitlement to work in the UK if not a national of a European Economic Area Country).
- Applicants must complete all the information under the Rehabilitation of Offenders Act 1974.
- All prospective new employees will be required to complete an enhanced DBS check.

Applicants must declare any of the following:

- If they have any unspent convictions, cautions, reprimands, or warnings.
- If they have any adult cautions (simple or conditional) or spent convictions that are not protected as defined by the Rehab of offenders Act 1974 (Exceptions) order 1975 (Amendment) (England & Wales) order 2020.
- If they are, or have ever been, subject to any police investigation and/or prosecution in the UK or any other country.
- If they are subject to any investigation(s) or proceedings by any regulatory body in relation to children and/or young adults or health/social care.
- If they have any gaps of employment or discrepancies in employment history.

- If they have been disqualified from the practice of a profession or required to practice if subject to specific limitations following a 'Fitness to Practice' investigation by a regulatory body in the UK or elsewhere (or have ever been in the past).
- If any declaration is made, the applicant must provide a written statement of the details surrounding the circumstances and submit the declaration confidentially alongside their online application.

Failure to do so will invalidate the application and if they are found to have any of the above at a later date may result in the employee's offer of employment being withdrawn or dismissal.

- Each applicant is requested to complete the Equal Opportunities Monitoring details on the online application which does not form part of the short listing criteria and is used for monitoring purposes only.
- If the applicant is applying to be a volunteer at Young Epilepsy, they will be required to complete an Application Form and provide the same information and undergo the same vetting as applies to employed staff.

Interviews

Interviewers must be familiar with the contents of the application form.

The information given will be *verified at interview* to ensure the following:

- Applicant's education, any professional qualifications or memberships, entitlement to Work in the UK, full employment history, and all employment gaps are adequately explained.
- Names of a minimum two current and/or previous employers (including any character references) are available to be contacted for references that validates continuous employment over the last five years
- The individual understands that an enhanced DBS Check is required, and if they have any unspent convictions, cautions, reprimands, or warnings, they must be declared at this stage, as failure to do so may invalidate the application.
- If an applicant has not been resident in the UK for a period of 3 months within the last 5 years, they must provide a Certificate of Good Conduct from the country or countries, which they were resident.
- In addition to checking the ability to perform the duties of the post, the interviewer will also explore issues relating to safeguarding and promoting the welfare of children and young adults and their motivation to work with them.

Applicant ID documentation information sheet

All applicants who have been short-listed for interview will be required to bring with them original ID documentation to their interview as listed below.

All ID documents will be examined and original copies will be taken, signed, and dated by a member of staff at Young Epilepsy to validate all relevant original ID documentation has been shown and verified.

If applicant(s) are successful, copies of the relevant ID documents will be placed on their electronic personnel file.

If any applicants(s) are unsuccessful this information will be destroyed in line with our Data Protection Procedure.

Proof of Right Work in the UK

| ID Documentation | Information / Notes | Issue Date & Validity |
|---|--|--|
| United Kingdom Passport | A passport showing the holder is a British citizen or a citizen of the UK and Colonies. | Valid up to and after expiry. |
| Birth Certificate with National Insurance Number | A full birth certificate produced in conjunction with proof of NI number issued by a Government Agency or previous employer. | No expiry. |
| EU Passport or National Identity Card | A passport or national identity card showing the holder, or a person named in the passport as the child of the holder, is a national of a European Economic Area country or Switzerland. | Valid up until expiry. |
| Biometric Residence Permit | Issued by the Home Office indicating that the person named can currently stay in the UK and is allowed to do the work in question. | Valid up until expiry. |
| Work Permit/Visa | Passports outside of the EEA & Switzerland will require a visa. The visa must be in date and the passport must also be in date. | Valid up until Visa or Passport expiry date (whichever expires first). |

DBS Documents

- 1 document from Group 1
- AND
- 1 document from Group 2b
- AND
- 1 document from Group 1, 2A or 2B

| ID Documentation | Information / Notes | Issue Date & Validity |
|--|---|-----------------------|
| Group 1: Primary identity documents | | |
| Passport | Any current and valid passport | Valid up until expiry |
| Biometric Residence Permit | UK | Valid up until expiry |
| EU National ID Card | Any current and valid cards | Valid up until expiry |
| Current driving licence photo card - (full or | UK, Isle of Man, Channel Islands and EU | Valid up until expiry |

| | | |
|---|---|--------------------------|
| provisional) | | |
| Birth certificate - issued within 12 months of birth | UK & Channel Islands (including those issued by UK Authorities overseas, Embassies, High Commissions and HM Forces) | Original Certificate |
| Adoption Certificate | UK & Channel Islands | Original Certificate |
| Group 2a: Trusted government documents | | |
| Current driving licence photo card - (full or provisional) | All countries inside the EU (excluding Isle of Man and Channel Islands) | Valid up until expiry |
| Current driving licence - paper version (if issued before 1998) | UK/Isle of Man/Channel Islands | Original Certificate |
| Birth certificate - issued more than 12 months after time of birth | UK, Isle of Man and Channel Islands | Original Certificate |
| Marriage/civil partnership certificate | UK and Channel Islands | Original Certificate |
| Group 2b: Financial and social history documents | | |
| Mortgage statement | UK or EEA | Issued in last 12 months |
| Bank or building society statement | UK and Channel Islands or EEA | Issued in last 3 months |
| Bank or building society account opening confirmation letter | UK | Issued in last 3 months |
| Credit card statement | UK or EEA | Issued in last 3 months |
| Financial statement, e.g. pension or endowment | UK | Issued in last 12 months |
| P45 or P60 statement | UK and Channel Islands | Issued in last 12 months |
| Council Tax statement | UK and Channel Islands | Issued in last 12 months |
| Utility bill | UK - not mobile telephone bill | Issued in last 3 months |
| Benefit statement, e.g. Child Benefit, Pension | UK | Issued in last 3 months |
| Central or local government, government agency, or local council document giving entitlement, eg from the Department for Work and Pensions, the Employment Service, HMRC | UK and Channel Islands | Issued in last 3 months |

Qualifications & Memberships

| Professional Qualifications / Memberships / Certificates | | |
|---|--|-------------------------|
| Professional Qualifications / Certificates / Memberships | Any current valid qualifications, certificates, or memberships | Original Certificate(s) |
| Degree Certificates | Any current valid Certificate(s) | Original Certificate(s) |
| Any relevant training certificate(s) | Any current valid Certificate(s) | Original Certificate(s) |

References

Offers of employment (temporary, fixed-term or permanent) are made conditional on receiving a minimum of two satisfactory references to validate continuous employment history/work placements/education/volunteering over the last **five** years and all other pre-employment checks as detailed above.

- Applicants are required to submit the names, addresses and telephone numbers of a minimum of two employment references to validate continuous employment history/work placements/education/volunteering over the last **five** years; one must be the present/most recent employer/work placements/education/volunteering, the second reference from a previous employer, these will be verbally verified where ever possible.
- The number of references required may differ for each applicant depending on how many episodes of employment they may have had within the last five years.
- Where an individual has been with one employer for five years or more an additional previous employment or character reference will also be required from a person of some standing within the community i.e. professional person, doctor, solicitor, MP, school teacher etc.
- Young Epilepsy may take up additional verbal or written references where reasonably practical to confirm employment where the applicant has worked within a similar care related environment.
- For those applicants who may have recently left full time education a reference will be sought from the training provider.
- Where the applicant has been self-employed within our set referencing period, evidence will be obtained i.e. HM revenue & Customs, bankers, accountants, solicitors, client references, etc.
- Any 'gaps' during an applicant's employment where appropriate will be clarified.

If, an applicant has declared a period of unemployment, we would verify where reasonably practical the details of the gap i.e. JSA letter, job searching.

- Where reasonably practical for all gaps of employment a signed statement confirming dates and explanation of gaps will be sought.
- Exec approval will be sought for roles where referencing will be carried out by a third party, agreements will be put in place with the third party to ensure our vetting procedure and safer recruitment guidelines have been implemented.

Pre-employment checks

- Should there be a need to investigate any aspect of the health questionnaire in relation to the role an assessment by our Occupational Health Provider may be required. In these circumstances the offer of employment will be based on an occupational assessment by our Occupational Health Advisor.

- Young Epilepsy will verify any professional qualifications or memberships, registrations, or PIN numbers.
- Young Epilepsy will verify applicants proof of 'Right to work in the UK' or proof of 'Entitlement to work in the UK' if not a national of a European Economic Area Country.
- Applicants must complete all relevant information under the Rehabilitation of Offenders Act 1974.
- Young Epilepsy will carry out an enhanced DBS Check for all prospective new employees (temporary and permanent).
- If the applicant has been a resident outside the UK for three months or more within the last five years a criminal record check or certificate of good conduct for each country will be required.
- Young Epilepsy will seek verification from any external agencies to ensure that their agency workers are referenced in line with these procedures.
- Young Epilepsy will carry out the same vetting checks for all volunteers as there is potential for them to be unsupervised on campus.

Additional checks in respect of professional groups

Teachers: all teachers will be expected to provide a DfES Number and the HR Department will check the NCTL Teacher Services secure access site to confirm the individual is a registered teacher and to undertake a prohibition check. . A Section 128 check will be undertaken for staff working in Education roles who have senior management and leadership responsibilities. Procius can also undertake these checks on our behalf.

Doctors: all doctors will be expected to provide evidence of their General Medical Council (GMC) Registration, and the GMC will be contacted to confirm the registration is valid.

Nurses: all qualified nurses will be expected to provide evidence of their UKCC Registration by showing their PIN card.

Other professional groups: Evidence must be provided of any other memberships of any professional body, where relevant, for example HPC, BPS, etc...

DBS code of practice

Young Epilepsy complies with the DBS Code of Practice 2016. The code is to ensure organisations comply with obligations, sensitive personal information, and that information released is to be used fairly. A copy of the DBS Code of Practice can be found on the Young Epilepsy notice board in the Main Reception area, the HR Department and on the Young Epilepsy website and Intranet. Applicants and staff are made aware of the availability of this Code of Practice. For more information visit: www.gov.uk/dbs. This is undertaken as part of the recruitment process and via the letter advising staff to complete a repeat and enhanced DBS Check every 3 years.

Criminal record checks – (enhanced DBS checks)

Young Epilepsy will carry out an enhanced DBS Check for all prospective employees, including trustees, governors, casual ad-hoc staff and volunteers, self-employed contractors, consultants, and agency workers (if applicable) in line with what is required for the role including regulated activity.

Regulated activity refers to certain roles that involve working with children or vulnerable adults, such as teaching and providing care. All organisations who recruit people for regulated activities must legally carry out Enhanced DBS checks to check whether they are barred and to prevent them from accessing these roles.

Young Epilepsy requires all applicants for employment or voluntary work to have a clear enhanced DBS Check. This will include a check of the Children's Barred List. Any previous employee who wishes to return to Young Epilepsy will require a new enhanced DBS Check. The information contained in the enhanced DBS Certificate is confidential and is for the purposes of Young Epilepsy's vetting procedure only, and will not be passed onto any third party.

Once the enhanced DBS Check has been received, a record will be made on the employee's file that a clear enhanced DBS Check was received on the relevant date. The original may be kept in a separate file for up to 6 months, after which time it will be destroyed in line with our Data Protection Procedure.

No prospective employee/volunteer should commence employment / voluntary work prior to the satisfactory return of full vetting, a satisfactory enhanced DBS Check, and a Certificate of Good Conduct (if applicable). Unless in exceptional circumstances as detailed in the Risk Assessment form where express permission has been obtained from the Head of Service and Director of Human Resources and a full Risk Assessment has been completed. It is the responsibility of the person completing and signing the risk assessment to ensure that the risk assessment and safety actions are adhered to.

Online enhanced DBS checks - Procius

Procius will undertake DBS checks on candidates they are vetting on our behalf. In order for them to do so Young Epilepsy need to confirm they have seen the correct and original DBS documents and add this information to the Procius website when inviting a candidate to join. Once the DBS check is completed, this information will show on the online portal. Candidates are required to bring their original DBS on their first day.

Online enhanced DBS checks- Atlantic Data Limited

Atlantic Data Ltd will undertake renewal DBS checks for employees staff off Young Epilepsy Atlantic Data Ltd will only share relevant information with other organisations responsible for carrying out enhanced DBS checks, for example the Disclosure & Barring Service, Police National computers or local Police Forces.

Upon completion of an enhanced DBS Check the information should be disclosed by the employee to Young Epilepsy, who will retain the information in accordance with

Young Epilepsy's Data Protection Act 1998 and its own internal policies. Young Epilepsy will not distribute any personal information to third parties without permission or if required by law to do so.

Criminal background checks for overseas applicants (Certificate of Good Conduct)

If an applicant has not been resident in the UK for a period of three months or more within the last five years, they must also provide a Certificate of Good Conduct from the country, or countries, that they have been resident in, before employment or voluntary work can begin. Applicants are responsible for providing their own certificate.

If an applicant is recruited directly from overseas, a satisfactory Certificate of Good Conduct from the country of origin must be provided in addition to an enhanced DBS Check and other references from potential overseas employees before employment/voluntary work can begin.

If original certificates are written in a different language other than English, the applicant will need to obtain a certified translation of the Certificate as Young Epilepsy will require a certified translated English copy. Applicants can contact the embassy of high commission of the country in question or the embassy of the country concerned for further assistance.

If a Certificate of Good Conduct is not available (as certain countries do not issue these), a personal signed declaration must be obtained from the candidate to verify that they have never had any criminal convictions recorded against them in any country in which they have resided. In these circumstances, Young Epilepsy may undertake any additional references required from potential overseas employees. Young Epilepsy will take evidence of any work permits or visa's required from the country or countries, which they have travelled to or resided.

Minimum age for DBS checks

Someone who is aged under 16 is not eligible to apply for an enhanced DBS Check. Applicants need to be 16 years of age and above in order to apply for an enhanced DBS Check.

Disclosure and Barring Service - update service

In December 2012 the Criminal Records Bureau and the Independent Safeguarding Authority merged into a single new Non-Departmental Public Body, to become the Disclosure and Barring Service. The Disclosure and Barring Service (DBS) carries out CRB's and ISA's functions (DBS Checks) as they will now be provided by one organisation rather than two, providing a service combining criminal records and barring functions. This service allows Young Epilepsy to access criminal record history of anyone working or seeking to work in certain positions especially those that involve working with children or young adults.

The update service allows all individuals (if they choose to subscribe to it, and pay a small annual subscription fee) to apply for a criminal record check (DBS Check)

once, and then if they need a similar type of check again, to reuse their existing DBS Certificate with their organisation checking online to see if the DBS Check is still up to date.

For further information about the DBS Update Service visit: <https://www.gov.uk/dbs-update-service>

Enhanced DBS single certificates

The Disclosure and Barring Service no longer issue a copy of an applicant's enhanced DBS Certificate to prospective employers, and therefore Young Epilepsy will no longer receive copies of candidates enhanced DBS Certificates.

All permanent staff and prospective employees, including trustees, governors, self-employment contractors, consultants, agency workers, and casual ad-hoc staff will need to provide an original copy of their enhanced DBS Certificate as a condition of employment prior to commencing any work. This includes any apprentices, work experience (if applicable) students or internships (aged over 16).

Failure to disclose and verify an enhanced DBS Certificate prior to commencing work, or not to disclose any criminal convictions, may invalidate the application and could result in the employee's offer of employment being withdrawn.

This also applies to volunteers as there is potential for them to be unsupervised on campus.

Positive criminal background checks

All prospective employees (temporary or permanent) including trustees, governors, self-employed contractors, consultants, volunteers, casual bank staff, and agency workers with Young Epilepsy are legally required to disclose any unspent convictions, cautions, reprimands, or warnings or any criminal charges pending.

Failure to do so will invalidate an application and if any inaccuracies or omissions are discovered after they start employment with Young Epilepsy, employment may be terminated with immediate effect. Where an applicant declares a conviction which, in the opinion of the recruiting line manager, should not necessarily bar the applicant from employment, the details should be submitted to Director / Head of Service and the HR Director for a final decision as to whether an offer of employment should be made.

This includes work experience, internships and apprentices (over 16 years of age).

Young Epilepsy accepts that a person with a criminal record is not necessarily unsuitable for employment. It is recognised that many offenders go forward to take constructive and caring roles in the community. It is not the intention of Young Epilepsy to exclude such offenders as a matter of course irrespective of the type and time of the offence. All organisations are required to have an Employment of ex-offenders policy.

However in the interest of safeguarding, Young Epilepsy may not employ an applicant with any of the following:-

- A conviction, caution, bind over, or reprimand for any sexual or violent offences
- A conviction, caution, bind over, or reprimand for child abuse or any other actions to the detriment of the children or young adults work force.
- A disqualification from working with children and young adults as set out in section 36 of the Criminal Justice and Court Services Act 2000
- Anybody who is included on List 99 and/or the Protection of Children Act (PoCA) List
- Disqualification from professional practice or profession
- A conviction, caution, bind over, or reprimand for threatening behaviour, grievous or actual bodily harm
- A conviction for any serious drug offences

This is not an exhaustive list and any variations from this policy must have written authority from the Chief Executive.

All positive criminal record checks will be reviewed by the Director of the Service, HR Director. The Lead DSL and the Lead Safeguarding Director will be informed of the nature of the positive criminal check if the candidate is to continue through the recruitment process.

Medical declaration

When an offer of employment is made, all prospective employees must complete a Health Questionnaire in full. The offer of employment will be subject to receipt of the Health Questionnaire and may be subject to a satisfactory medical reference or medical examination. The Occupational Health Advisor will advise on suitability for employment on health grounds, and whether any reasonable adjustments need to be made. The Occupational Health Advisor may wish to contact the prospective employee's GP or Consultant for further information in order to provide appropriate advice. If this is the case, the prospective employee will be asked to complete a Medical Request Form, giving consent for access to their medical records, in accordance with the Access to Medical Records Act 1990.

A positive health declaration will not necessarily affect employment prospects.

Any health issues may be discussed at interview in the context of the position applied for. Young Epilepsy does not discriminate on the grounds of disability where reasonable adjustments can be made.

During employment

All employees, including trustees, governors, self-employed contractors, consultants, casual workers, volunteers, and agency workers are required to comply with the following during employment at Young Epilepsy:

- Where the employee transports students in their own or a Young Epilepsy vehicle he/she must advise Young Epilepsy immediately of any penalties incurred for driving offences or loss of driving licence.

- To declare any implication in criminal investigations in writing as soon as possible, in confidence to the HR department.
- Immediately declare any convictions, cautions, reprimands or warnings received to the HR department
- To produce original evidence of professional memberships on an annual basis (e.g. Doctors, Nurses, Teachers etc).
- Co-operate fully in any investigation of any accident or incident when using a vehicle on Young Epilepsy business.
- To produce original evidence of time limited visas / work permits every 12 months.
- Comply when requested by the HR department, to re-apply for an Enhanced DBS Check at intervals of no more than three years apart. Original ID documentation will be requested and viewed on each occasion.
- It may be possible for a risk assessment to be completed if the DBS has been started but not received. However, if the delay is caused by the worker or required person(ie volunteer) of Young Epilepsy not engaging in the process or providing the required documentation then the person may be stood down from working or carrying out any duties for Young Epilepsy until the DBS renewal is completed and received. It may also result in disciplinary action being taken and may lead to dismissal. If a risk assessment is put in place the Line Manager will need to obtain a formal declaration from the employee reporting any offences or other disclosable events that have occurred since the date of their last check. This arrangement can remain in place until the outcome of the DBS is confirmed and cannot exceed 12 months under any circumstances.

Criminal convictions during employment

Where it is discovered that an employee has committed a criminal offence during their employment with Young Epilepsy, their case will be investigated by the Company. Due consideration will be given to the nature and circumstances of the offense. Acquiring a criminal record will not automatically lead to dismissal.

The employee shall be expected to cooperate with Young Epilepsy's investigations and may be required to re-apply for a current enhanced DBS certificate. Young Epilepsy may take disciplinary action or other action necessary to address any concerns arising from an employee's conviction(s). Offences which lead to the employee being barred from their job, or which prevent the employee from carrying out their job, may lead to dismissal following disciplinary action.

Any variations to this policy in respect of criminal record checks for existing employees must have written authority from the Director of Human Resources and/or the Chief Executive, which records the following on the candidates personnel file:

- Date and type of disclosure
- Disclose reference number
- Name of individual
- Position in question

- Name(s) of HR or Recruitment who dealt with the case
- The recruitment decision taken

Trustees

Young Epilepsy is governed overall by the Young Epilepsy Trust Board, which consists of a Chairman and Trustees from a variety of relevant backgrounds. The Trustees volunteer their time, and in addition to preparing for and attending Board meetings, they chair or participate in a variety of sub committees.

All prospective Trustees will be asked to submit a 'Curriculum Vitae' and attend an interview. Following a successful interview, the prospective Trustee will be invited to attend a Trust Board meeting. Once their appointment is approved by the Trust Board it will be confirmed when a satisfactory enhanced DBS Check is received. Trustees may take up their duties once a clear enhanced DBS Check is submitted, but their appointments would be rescinded in the event of an unsatisfactory DBS Check, or unsatisfactory reference checks being received.

Governors

The School and FE Governing Bodies oversee and monitor the education and care provision at Young Epilepsy. They are part of the wider committee structure under the overall supervision of the Trust Board.

All prospective Governors will be asked to submit a 'Curriculum Vitae' and will be invited for an interview and then invited to observe a meeting as well a visit to the School/College. Governors will be asked to sign a declaration confirming their suitability to fulfil the role. References will be taken up at this stage. Once their appointment is approved by the Trust Board the prospective Governor is able to act and fulfil their duties for three years. Governors will be required to obtain a satisfactory enhanced DBS Check prior to their appointment being confirmed. In the event of an unsatisfactory DBS Check, or unsatisfactory reference checks being received the appointment would be rescinded. Governors will be asked to sign a conflict of interest declaration.

Agency workers

Where Employment Agency Workers are used by Young Epilepsy, the Agency will be required to provide evidence that the necessary vetting checks have taken place, including a clear enhanced DBS check dated within the last year, satisfactory reference checks, verification of applicants proof of 'Right to work in the UK, and any other additional checks required verifying visas or work permits have been carried out within the last 12 months. Agencies must provide a Certificate of Good Conduct where the Agency worker has not been resident in the UK for a period of three months or more within the last five years. This evidence must be provided prior to commencement of any duties at Young Epilepsy.

How Young Epilepsy's Employee Vetting Policy relates to Agency Workers and Temporary staff

Vetting requirements for all prospective employees before commencing employment must be undertaken by the Agency as follows:

- Check of identity against official ID documentation.
- Proof of 'Right to work in the UK'.
- Clear enhanced DBS Check within the last 12 months.
- Satisfactory written references (including most recent employer and previous employer(s), verbally verified in line with Young Epilepsy's vetting policy.
- Evidence of a competency interview.
- Verification of any relevant or professional qualifications or memberships.
- Full employment history must be explained and any gaps of employment or discrepancies documented and accounted for.
- Declaration of any convictions, cautions, bind over's or reprimands or if have ever been, subject to any police investigation and/or prosecution in the UK or any other country.
- Positive Criminal Checks, as details above.
- Certificate of Good Conduct (if applicable)

Temporary Staff members (including self-employed contractors and consultants) should not commence work until all the relevant vetting checks are satisfactorily completed. This also applies to *Agency staff*, where the Agency will need to be able to verify the following:

- An interview has taken place where they are satisfied that the person can evidence relevant experience, qualification(s) and explain career history.
- Proof of identity and legal status to of entitlement to work in the UK has been checked.
- Satisfactory written references (including most recent employer and previous employer(s), verbally verified in line with Young Epilepsy's vetting policy.
- In receipt of an enhanced DBS Check within the last 12 months.
- Check of identity against official ID documentation.
- Verification of any relevant or professional qualifications or memberships.
- Full employment history must be explained and any gaps of employment or discrepancies documented and accounted for.
- Certificate of Good Conduct (if applicable)

- Declaration of any convictions, cautions, bind over's or reprimands or if have ever been, subject to any police investigation and/or prosecution in the UK or any other country.

The Agency will need to provide written assurance that their procedures meet with the above criteria. Where the Agency carries out enhanced DBS checks, they should state in writing that they have received a satisfactory check. Agency Workers will need to provide Young Epilepsy with a copy of their original enhanced DBS Certificate.

Other agencies for admin staff etc

Staff should explain to the temporary member of staff that they would be required to undertake an enhanced DBS Check (unless the temporary member of staff is working for less than one week in an area with no contact with the students).

Temporary members of staff working in proximity to the students must be supervised at all times until the line manager is confident in their ability and only where all satisfactory checks have been completed and evidenced.

Self-employed contractors

All Self-Employed Consultants are responsible for obtaining their own professional indemnity insurance.

Record keeping

Young Epilepsy will record and retain the following information for Agency Workers and temporary members of staff:

- Name, address, any relevant contact details.
- Profile card
- All vetting details which have either been completed by Young Epilepsy or the Agency.
- Record of a clear enhanced DBS check either completed by the Agency or taken up by Young Epilepsy.
- Work location, pay rate, and duration.
- Time sheets and invoices (if applicable).

If utilising agency workers via a recruitment agency ensure you have:

- Written evidence of all vetting undertaken.
- Agency contractual details, contacts, and Terms of Business.
- Single centre record of any agency worker working at Young Epilepsy.
- Fully populated Young Epilepsy profile card.

Volunteers

Volunteers are subject to the same vetting procedures as stated above. A volunteer is a person who performs any activity which involves spending time, unpaid (except for expenses), which aims to benefit Young Epilepsy.

This procedure may not however apply to individuals or groups supporting the organisation on one-off projects.

This will be determined on a case by case basis.

Rotational Specialist Registrars

Young Epilepsy participates in the North and South Thames paediatric training programme for doctors by offering six month rotational posts for Specialist Registrars. These posts change over at the beginning of March and September each year. In addition Young Epilepsy also offers an honorary post for a Specialist Registrar from Surrey and Sussex NHS Trust to attend Young Epilepsy one day per week. The post holder also rotates every six months consistent with the North and South Thames training posts.

Despite Young Epilepsy's involvement in the training of these Specialist Registrars, Young Epilepsy is not part of the NHS and has its own established Employee Vetting Policy to be followed for all prospective employees. Although the Specialist Registrars are part of an on-going training programme and are not normally subject to re-checking every 6 months at training placement changeover within the NHS, nevertheless Young Epilepsy must comply with its vetting requirements in respect of these trainees as part of their contract with us, whilst also ensuring a workable system which can meet the changeover deadlines.

Contact is made with the HR department at the respective Deanery in respect of the Rotational Specialist Registrars and with Medical Staffing at Surrey and Sussex NHS Trust in respect of the Honorary Specialist Registrar one day per week as soon as notification of the doctors' names are received, usually mid training placement i.e. December and June each year.

Contact is to establish confirmation of the following prior to start of the training placement:

- Name, address and other contact details i.e. home telephone number, mobile number and email address.
- Two satisfactory reference on their central file held at the Deanery
- The registrar holds a *current clear enhanced DBS Check* - i.e. within the last 3 years, ideally supplying us with the DBS number and date. The Specialist Registrar is also asked to supply evidence of this.
- Confirmation that the registrar holds a valid PALS certificate. The Specialist Registrar is also asked to supply evidence of this.

- The registrar has satisfactorily completed the training programme to date, and we are made aware of any performance issues.

Young Epilepsy will comply with its usual vetting procedure including referencing and applying for an enhanced DBS Check at the earliest stage possible. If they do not already hold a current enhanced DBS Check as defined above, the commencement of their placement will be delayed until this is received.

This procedure is agreed by the Director of Human Resources and will be implemented by all departments.

Signed: ..

Date: November 2021



Director of Human Resources

Date of next review: November 2022

Addendum to Vetting Procedure – Pre-employment Checks

*The following temporary amendments have been made to the pre-employment vetting check requirements:

- The reduction of obtaining employment/education/volunteering references from the last five years to three years.
- Interviews for candidates for School and College roles can proceed without a pre-interview reference being obtained.

These are temporary amendments to the vetting procedure and have been agreed by the Executive Team as a measure to address urgent recruitment and staffing challenges. This decision was taken after an exploration of the potential risks of changing vetting requirements balanced with the impact of staff vacancy levels on operational delivery.

To mitigate potential risks, the following measures are in place:

- Safer recruitment practices will be followed, including a thorough exploration at the shortlisting and interview stages of the candidate's skills, experience and employment history.
- All other elements of the recruitment and vetting procedures remain in place.
- All offers of employment are made subject to completion of satisfactory vetting checks. Young Epilepsy reserves the right to withdraw an offer of employment if vetting checks are not satisfactory.
- The amendments to the procedure will be kept under regular review.

Review dates:

19 January 2022 – Executive Team agreed temporary amendments to procedure

23 March 2022 – Operational Leadership Team agreed to continue with the amended procedure. Consideration given to the positive impact on recruitment times, reduction in staffing vacancies and potential risks.

The procedure will be reviewed by the Executive Team in July 2022.