

Freelance Safer Recruitment Policy and Procedure

Overview and Scope

No Limits Development is committed to upholding high standards of recruitment and ongoing management in respect of its Freelance Instructors. This policy sets to bring together procedure and policy from various documents and systems, to give a clear oversight of how No Limits Development manages the required information from its freelance staff, in accordance with “Safer Recruitment” and best practice.

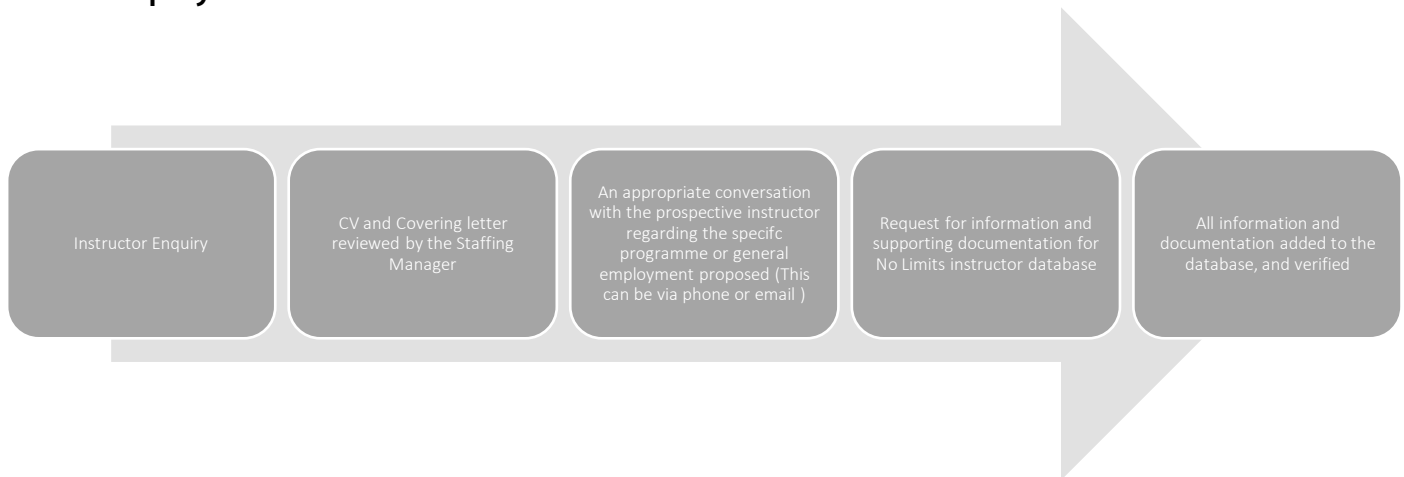
For the purpose of clarity “Freelance Instructors” are “Labour only sub-contractors” (HSE guidance term) employed on day rates to deliver No Limits Developments programmes under its policy procedure and guidance. Instructors are self employed and responsible for their own financial and tax affairs outside of invoicing NLD for the labour provided.

This policy aims to go into greater depth than the summary in our instructor handbook, to lay out policy and procedure for safer recruitment.

Employment Procedure Summary (Directly removed from NLD Instructor Handbook)

No Limits Development drives itself to employ the very best of staff, and to ensure our recruitment procedure is thorough and efficient. We not only have a responsibility to ensure we recruit competent and appropriate staff for our programmes, but to ensure we are open and honest with prospective instructors about the nature of our operations and programmes. No Limits prides itself on creating and maintaining long term relationships with its staff.

Initial Employment



Information Required

No Limits requires the following information from instructors, which is held on a secure database in-line with our GDPR Policy. This information is required to satisfy a variety of criteria, which can be found within this handbook, Safeguarding Policy and Policy Handbook.

- Personal Information (Name, Phone Number, email address)
- Next of Kin Name and Phone number (For use in emergency situations)
- Enhanced DBS check (Within the last 3 years, or registered on the DBS update service)
- First Aid Certificate (Within 3 years)
- Copies of any relevant NGB Qualifications or training (Including Safeguarding)
- ID (with proof of right to work in UK if needed) – This must match the DBS Check provided

Freelance Safer Recruitment Policy and Procedure

- A signed copy of the NLD Instructor contract
- 2 References

We also require instructors to thoroughly read our policies and procedures which can be found on our website, and send an email to us confirming they have read them and agree to abide by them

Employment Procedure – Further Detail

1 – Initial Contact and CV

Initial contact can come through many sources but generally contact is made via email through word of mouth, or via campaigns on industry specific groups for role specific instructors. The CV and initial email are vetted by a member of the operations team against the instructor job description. Any observation or queries on the CV should be made on the telephone interview crib sheet, for follow up.

2 – Application Form

All new prospective applicants must complete an application form and submit this signed with the supporting documents. The application form covers 3 main categories

1. Personal Details – Gathered to assess suitability for the job and to provide operationally necessary information, such as next of kin and qualifications
2. References - To follow up on and corroborate work history and suitability for the role
3. Legal Declarations – To ascertain if follow up is required

3 – Telephone Interview

A telephone conversation is had between a member of the operations team and the applicant as laid out in the telephone interview crib sheet. The purpose of the interview is to corroborate the information given in the CV and application form, as well as to raise any questions noted earlier in the process. The interview should equally give the applicant a full understanding of who No Limits are and our expectations of them, whilst giving them the opportunity to ask questions.

4 – Applicant added to Instructor HR Database

After the stage vetting above, if an applicant is suitable, they will be added to our database ahead of recruitment checks below.

5 - Acceptance of NLD Policy, Procedure

Instructors will be emailed our full policy procedures and handbooks. Instructors must email back confirming they are happy to abide by the policy and procedure set out in these documents.

6 - References

Following up on the information given by the applicant, No Limits will email the two references given who should be professional references from the last 3 years (checked against CV), with our standardised reference form. Once returned the references are checked by the team for any concerns before being added to the

7 – DBS Check

All freelance instructors are required to have a full enhanced DBS Check. No Limits Development recognises that there is a current transition between printed dated CRB Checks and DBS Checks registered on the update service. We are therefore happy to accept any of the following:

- a) A CRB Check Issued within the last three years, in a role similar to the one being applied for, and must be for a role working with under 18's or vulnerable adults
- b) A DBS Check registered on the Update service
- ~~c) A DBS Check completed by No Limits Development~~

Freelance Safer Recruitment Policy and Procedure

DBS Checks are generally expected to return with no disclosures. In the event of a disclosure from either the DBS check or Application form, the employment decision should be passed to a Director to investigate further, ensure risk is managed and employment law is followed.

8 - Proof of Identity and right to work in UK

This is an important step in the in the process, but potentially the most difficult as it needs to be done in person. NLD requires a copy of 2 original documents, which must be seen by an approved person, 1 confirming identity and 1 confirming address. Applicants cannot use one form of identification for both name and address. For example, if you provide your driving licence as proof of your name you must provide another form of identification for your address, such as a utility bill. Suitable documents are:

Proof of name	Proof of address
Current signed passport	Utility bill (gas, electric, satellite television, landline phone bill) issued within the last three months
Original birth certificate (UK birth certificate issued within 12 months of the date of birth in full form including those issued by UK authorities overseas such as Embassies High Commissions and HM Forces)	Local authority council tax bill for the current council tax year
EEA member state identity card (which can also be used as evidence of address if it carries this)	Current UK driving licence (but only if not used for the name evidence)
Current UK or EEA photocard driving licence	Bank, Building Society or Credit Union statement or passbook dated within the last three months
Full old-style driving licence	Original mortgage statement from a recognised lender issued for the last full year
Photographic registration cards for self-employed individuals in the construction industry - CIS4	Solicitors letter within the last three months confirming recent house purchase or land registry confirmation of address
Benefit book or original notification letter from Benefits Agency	Council or housing association rent card or tenancy agreement for the current year
Firearms or shotgun certificate	Benefit book or original notification letter from Benefits Agency (but not if used as proof of name)
Residence permit issued by the Home Office to EEA nationals on sight of own country passport	HMRC self-assessment letters or tax demand dated within the current financial year
National identity card bearing a photograph of the applicant	Electoral Register entry

Freelance Safer Recruitment Policy and Procedure

Proof of name	Proof of address
	NHS Medical card or letter of confirmation from GP's practice of registration with the surgery

Due to the remote nature of our employment and working, it is not always possible for the operations team to do this in person. Therefore, to ensure the system is achievable the following options for checking are suitable:

- In person by a member of the operations team
- By a course director who has been approved to do so by a company director, who will confirm via email to the operations team the documents attached are a true representation
- By a pre agreed checking service such as the post office

All persons carrying out the checking need to be aware of this full policy and the following supporting advice:

- <https://www.gov.uk/government/publications/proof-of-identity-checklist/proof-of-identity-checklist>
- https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/774286/Right_to_Work_Checklist.pdf
- <https://www.gov.uk/government/publications/dbs-identity-checking-guidelines/id-checking-guidelines-for-dbs-check-applications-from-3-september-2018>

In most cases, the proof of ID will also establish the right to work in the UK. Where this is not clear or possible via step 1 of the Home Office approved checklist, this should be referred to the operations team.

9 – Overseas Checks

Where an applicant has disclosed that they have lived or work overseas, for a continuous period of greater than 3 months, further checks may be required. This should be referred to a director for guidance in conjunction with the following government advice <https://www.gov.uk/government/publications/criminal-records-checks-for-overseas-applicants> and potentially external advice.

Document Storage

All supporting evidence to the above process must be stored on either the NLD Instructor OneDrive or Smartsheet and managed in accordance to our GDPR Policy. Paper copies must be scanned and uploaded with any other photocopies destroyed at the earliest convenience.

Deviations from Standard Procedure

No Limits Development recognises that whilst the above is a tough process which meets best practice. There are some circumstances which require an abbreviated process, which mitigates risk, but creates an achievable solution. Where deviation is required from the above standard process, this must be signed off by a company director and added to this document.

1 – Short Notice Working

Situation: On occasion such as when a staff member pulls out of a course last minute it may be required to employ someone at very short notice such as the night before. In this instance there is not the time required to carry out the full process

Freelance Safer Recruitment Policy and Procedure

Mitigating Risk Factors:

- This abbreviated process may only be used for bookings within 2 weeks of a course
- This abbreviated process can only be applied to instructors who are not working alone (either with a teacher or a fully recruited freelance staff member)

Process: Instructors must complete steps 1 – 5 and submit an accepted DBS Check. Their identity must be checked upon arrival at the course by an approved member of staff, and must match that on the DBS. All other checks must be completed should they wish to work on further courses for No Limits which are booked outside of this 2-week timescale.

2 – Long Term Employees transferring to the new system

Situation: Whilst NLD has been operating for over 10 years, this policy is new and therefore we will have members of staff working with us for whom certain steps may not have been carried out. For approved instructors it would be unnecessary to carry out certain steps.

Mitigating Risk Factors:

- This abbreviated process may only be used for instructors who have worked alongside or been observed on multiple occasions by the operations team
- Instructors following this process must be approved by a company director

Process: All Instructors transferring across from the old system to the new and approved are entitled to skip steps 1 to 3 and Referencing. Provided they are individually approved by a company director. For ID and right to work checks where the instructor has met a member of the operations team, and can declare the photo to be a true likeness, copies in this instance will be acceptable provided they are on the route 1 list.