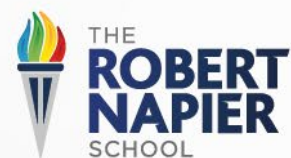




RECRUITMENT & SELECTION POLICY & PROCEDURE

Reviewed: September 2023 (next review Autumn 2024)



Policy

This policy applies to all schools and operations of Beyond Schools Trust ('the Trust'), and to all its workforce and volunteers.

This policy has been developed to embed safer recruitment practices and procedures throughout the Trust and to support the creation of a safer culture by reinforcing the safeguarding and well-being of children and young people in our care. This policy complies with guidance outlined in the Department for Education's Keeping Children Safe in Education.

This policy reinforces the expected conduct outlined in our Staff Code of Conduct as well as our Whistleblowing Procedure, which all staff are expected to be familiar with. All successful candidates for paid or volunteer employment will be made aware of these documents.

This policy is an essential element in creating and maintaining a safe and supportive environment for all pupils, staff and others within the Trust and aims to ensure both safe and fair recruitment and selection of all staff and volunteers by:

- attracting the best possible candidates/volunteers to vacancies
- deterring prospective candidates/volunteers who are unsuitable from applying for vacancies
- identifying and rejecting those candidates/volunteers who are unsuitable to work with children and young people

We are committed to using procedures that deal effectively with those adults who fail to comply with our safeguarding and child protection procedures and practices.

Procedure

Roles and Responsibilities

The Trust will:

- Ensure we have effective policies and procedures in place for the safe and fair recruitment and selection of staff and volunteers in accordance with Department for Education guidance and legal requirements
- monitor our compliance with them
- ensure that appropriate staff, trustees, and governors have completed safer recruitment training (and repeat this every 3 years)

Headteachers, Senior Leaders and Human Resources will:

- ensure that all schools and operations of the Trust operate safe and fair recruitment and selection procedures which are regularly reviewed and updated to reflect any changes to legislation and statutory guidance
- ensure that all appropriate checks have been carried out on staff and volunteers within the Trust
- monitor any contractors and agencies compliance with this document

- promote the safety and well-being of children and young people at every stage of this process

Safer Recruitment

All recruitment activities must be in line with this policy and procedure to ensure that we identify, deter and prevent people who pose a risk of harm from working with our pupils.

The recruitment of all employees and staff for the Trust must, without exception, follow the processes of safer recruitment. All offers of employment/engagement will be subject to us being satisfied that the applicant or volunteer is a suitable person to work with children and young people.

At least one person on the interview panel will have completed the online Safer Recruitment in Education e-learning course within previous three years or show evidence of having completed a similar accredited course within the same time frame.

Any person who becomes aware that this policy is not being followed during recruitment must inform the Headteacher, the Chief Executive Officer, Head of People or a safeguarding officer immediately.

Preparing for Recruitment

Job Description and Person Specification

At the start of the recruitment process, it is important to define what the post holder's responsibilities for children/vulnerable adults will be over and above the qualifications and experience needed to perform the job. To make clear the Trust's commitment to safer recruitment, it is advisable to include the statement below on all job descriptions or person specifications.

"Beyond Schools Trust is committed to safeguarding and promoting the welfare of children and young people and all staff must ensure that the highest priority is given to following the guidance and regulations put in place. All staff are to have due regard for safeguarding and promoting the welfare of children and young people and to follow the child protection procedures as set out by Beyond Schools Trust. Any safeguarding or child protection issues must be acted upon immediately by informing the Designated Safeguarding Lead at the site where you are located."

It is envisaged that due to the nature of work in all primary and secondary schools, and resultant contact with children, all posts will require an enhanced DBS Disclosure and, in most cases, a check of the children's barred (and adult barred list where applicable - identified roles in secondary special schools only).

Where the Disqualification under the Childcare Act 2006 requirements also apply to a post, this should also be reflected in the person specification.

All job descriptions must detail:

- main duties and responsibilities of the post
- the post holder's specific responsibility towards the promotion and practice of safeguarding the welfare of children that they come in to contact with through their job

All job descriptions and/or person specifications must detail:

- qualifications required to do the job
- professional registrations (if required)
- enhanced DBS Disclosure required / if Disqualification under the Childcare Act 2006 applies whether the post is in regulated activity and therefore requires a check of the children's barred list, or where relevant the adult barred list
- the experience, skills and competencies required, if appropriate referencing qualities relating to the safeguarding of children, such as:
 - motivation to work with children
 - ability to form and maintain appropriate relationships and personal boundaries with children
 - emotional resilience in working with challenging behaviours
 - attitudes to use of authority and maintaining discipline

It is expected that all essential criteria on the person specification should be evidenced either in a candidate's application form or through the interview and selection process.

A recruitment agreement is prepared by the school for checking by Beyond Schools Trust Head Office and once confirmed the position can be advertised a recruitment pack will be prepared.

Inviting Applications

All advertisements for posts of regulated activity, paid or unpaid, will include the following statement: -

"Beyond Schools Trust is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share in this commitment. All post holders in a regulated activity are subject to appropriate vetting procedures and a satisfactory "Disclosure and Barring Service (DBS) Enhanced Check".

All applicants will receive details for the following when applying for a post:

- a statement of our commitment to ensuring the safety and well-being of the pupils
- job description and person specification for the post, which is used as selection tool for shortlisting
- the Safeguarding and Child Protection Policy, appropriate to the school or operation where the post is based (or a link to the policy via the website)

- the Recruitment of Ex-Offenders Policy (or a link to the policy via the website)
- DBS - A guide for applicants and information on filtering (see appendix 2)
- the application form

Prospective applicants must complete, in full, and return/submit a signed application form. Where we receive an incomplete application form complete any missing detail must be received prior to closing deadline.

We will ask for written information about previous employment history and check that information is not contradictory or incomplete.

Candidates submitting an application form are required to sign the application form with an e-signature or where a paper application with actual signature.

A curriculum vitae will not be accepted in place of a completed application form.

Identification of the Recruitment Panel

At least one member of the Recruitment and Selection Panel will have successfully completed training in safer recruitment within the last 3 years. The Trust/School should keep a register and copies of Safer Recruitment Certificates.

Shortlisting and References

Candidates will be short listed against the person specification for the post.

The selection panel must consider any gaps in employment and inconsistencies in the information provided on the form. These areas should be highlighted and discussed with candidate at interview.

We will seek, where possible, references on all short-listed candidates before interview. We will scrutinise these and resolve any concerns before confirming appointments. The references requested will ask specific questions about the suitability of the applicant to work with children. Where the candidate has previously worked with children but not in their previous role, a reference from the relevant employer where candidate worked with children should also be provided.

At least two references, one of which must be from the applicant's current/most recent employer where possible, will be taken up before the selection stage so that any discrepancies may be probed during this stage of the procedure (note references should come from the head of the previous organisation, not a colleague). Open references, for example, to whom it may concern, will not be accepted. Where candidate has had a reference from a school or college ensure this has been signed off by the headteacher to ensure accurate information has been provided in respect of any disciplinary investigation.

References will be sought directly from the referee and, where necessary, will be contacted to clarify any anomalies or discrepancies. Detailed written records will be kept of such exchanges. Where possible references will be requested in advance of interview.

Where necessary, previous employers who have not been named as referees may be contacted in order to clarify any such anomalies or discrepancies. Detailed written records will be kept of such exchanges.

Referees will be asked specific questions about the following:

- the candidate's suitability to work with children and young people
- any substantiated allegations
- any disciplinary warnings, including time-expired warnings, relating to the safeguarding of children and young people
- the candidate's suitability for the post
- applicants current post and salary
- disciplinary record

All appointments are subject to satisfactory references, vetting procedures, and DBS clearance.

Invitation to Interview

Candidates called to interview will receive:

- an email letter confirming the interview and any other selection techniques
- a 'self-disclosure' form
- details of the interview day including details of the panel members
- details of any tasks to be undertaken as part of the interview process
- the opportunity to discuss the process prior to the interview
- contact details of suitable contact
- details of who to contact for any adjustments that may be required

Candidates called to interview will be asked to provide proof of identity and relevant qualifications. Original documents requested are:

- passport
- birth Certificate
- driving Licence
- marriage Certificate (if appropriate)
- utility Bill or Bank Statement (issued in the last three months)
- relevant qualifications.

Rehabilitation of Offenders

As they involve direct contact with children, all posts within the Trust's schools are exempt from the Rehabilitation of Offenders Act 1974 (exceptions 1975) (amended 2020).

As a prospective employer, you should inform all candidates of their responsibility to disclose any unspent cautions, convictions or bind-overs, and any offences that would not be filtered, during the application stage.

Shortlisted candidates will be asked to submit a self-disclosure form at the point of being invited to interview.

Disclosed information should be assessed to ensure that it is either unspent or not protected / filtered, as protected offences must not be discussed with the candidate even if they have self-disclosed.

Should a positive disclosure be made, it is expected that advice is sought from Human Resources to agree next steps, which may include discussing the disclosed information with the candidate at interview. Having a criminal conviction will not necessarily bar a person from working with children and should not be used to automatically discount applications.

The Selection Process

Selection techniques (shortlisting for interview) will be determined by the nature and duties of the post, and all vacancies will require an interview of suitable short-listed candidates.

Interviews will always be face-to-face, in exceptional circumstances this may be by video call. Interviews may include additional interview techniques such as observation or exercises.

Candidates will be required to:

- explain any gaps in employment
- explain satisfactorily any anomalies or discrepancies in the information available to the panel
- discuss any disclosures referred to on the completed self-disclosure form and any information that is likely to appear on the DBS disclosure
- demonstrate their ability to safeguard and protect the welfare of children and young people and their ability and willingness to promote fundamental British values

Panel members will be required to:

- agree questions for candidates based on job description and person specification
- ask about any gaps in employment and explore any anomalies or discrepancies in the information available to the panel
- record notes of interview on interview assessment form, and score as appropriate.

Employment Checks

An offer of appointment will be conditional, and all successful candidates will be required to:

- verify their identity
- obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will not retain a copy but do need to see the original certificate as soon as received by candidate. (See Appendix 1)
- verify their mental and physical fitness to carry out their work responsibilities
- verify their right to work and remain in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- verify their professional qualifications, as appropriate
- ensure they are not subject to a prohibition order if they are employed to be a teacher

Further additional checks will be carried out, as appropriate, on candidates who have lived or worked outside of the UK, including (where relevant):

- any teacher sanctions or restrictions imposed by a European Economic Area professional regulating authority
- criminal records check or their equivalent overseas police check for any individual who within the last five years* has lived or worked outside the United Kingdom, whether they are a British citizen or not

** Five years is a guide, and we may carry out any further checks that we think appropriate so that any relevant events that occurred outside the UK can be considered.*

The Trust will carry out an online search as part of the recruitment process on the preferred candidate. All offers of employment are conditional subject to satisfactory completion of the mandatory pre-employment checks.

We will check that candidates taking up a management position are not subject to a prohibition from management (known as a Section 128 Check) direction made by the secretary of state.

This check applies to:

- CEO and any central post on the Executive Team and senior leadership team
- Headteachers
- teaching posts on senior leadership teams
- teaching posts which carry a departmental head role
- support staff posts on a senior leadership team; and
- we will assess on a case-by-case basis whether the check should be carried out when appointments are made to teaching and support roles which carry additional responsibilities.
- It also applies to appointments to the Trust's Board of Directors and Local Governing Bodies.

The relevant information is contained in the enhanced DBS disclosure certificate (which we obtain for all posts that amount to regulated activity). It can also be obtained through the Teaching Regulation Agency Teacher Services system. We will use either, or both, methods to obtain this information.

For our schools with pupils aged under 8 we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the Childcare Disqualification Regulations and Childcare Act 2006.

Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

“Regulated activity” means a person who will be.

- Responsible, on a regular basis in a Trust setting, for teaching, training, instructing, caring for or supervising children; or
- Carrying out paid, or unsupervised unpaid, work regularly in a Trust setting where that work provides an opportunity for contact with children; or
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not.

All checks will be:

- confirmed in writing
- documented and retained on the personnel file
- recorded on our Single Central Record
- followed up if they are unsatisfactory or if there are any discrepancies in the information received

Employment will commence subject to all checks and procedures being satisfactorily completed

Eligibility to work in the United Kingdom

Under the Immigration, Asylum and Nationality Act 2006 it is a criminal offence to employ someone without entitlement or permission to work in the UK. Section 15 of the Act requires all employers in the UK to make basic document checks on every person before they start work to help ensure that they do not employ illegal workers. Employers are also required to recheck documents at least every 12 months if the employee has time-limited leave to enter or remain in the UK. Employers incur a significant fine if they employ an illegal worker.

To ensure that recruitment practices are not discriminatory, all short-listed applicants, regardless of their colour, race, nationality, or ethnic or national origin, will be asked to produce original documents as evidence of their right to work in the UK. Where a preferred candidate requires a Skilled Worker Visa (previously Tier 2 General) status to work for the Trust the appointing officer will contact the HR Department for advice before an offer of employment is confirmed.

Induction

All staff and volunteers who are new to the Trust will receive information on the Safeguarding and Child Protection Policy appropriate to the school or operation where they will be based, and procedures and guidance on safe working practices which would include guidance on acceptable conduct/behaviour. These expectations will form part of new staff members' induction training.

All successful candidates will undergo a period of induction and will:

- meet regularly with their induction tutor or their line manager
- attend appropriate training including generalist child protection training

Trustees, Governors, and Members

- Trustees, Governors, and Members will have an enhanced DBS check without barred list information. An enhanced DBS certificate, which includes a barred list check will only be requested if the governor will be engaging in regulated activity, this also applies to volunteer governors.

All trustees, local governors and members will also have the following checks:

- A section 128 check (to check prohibition on participation in management under section 128 of the Education and Skills Act 2008)
- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

Volunteers

We will:

- never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment.
- obtain an enhanced DBS check with barred list information for all volunteers who are new to working in "regulated" activity

Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at a school, or any Trust setting has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

- an enhanced DBS check with barred list information for contractors engaging in regulated activity
- an enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children

We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at Trust premises.

In addition, for our schools with pupils aged under 8, when we use self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Trainee / Student Teachers

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

In both cases, for our schools with pupils aged under 8, this includes checks to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

Supply Staff Agency and third-party staff

We will only use those agencies which operate a safer recruitment policy, and we will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. Any information disclosed as part of the DBS check will be treated confidentially. These agencies should be able to demonstrate that their staff have received appropriate safeguarding training.

We will carry out identity checks when the individual arrives at Trust premises, and we will also check that the person presenting themselves for work is the same person on whom the checks have been made.

Staff working in alternative provision settings.

Where we place a pupil with an alternative provision provider, we will obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform.

Adults who supervise pupils on work experience.

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

Recruitment of 'Ex-Offenders'

Please refer to Appendix 3 for the Recruitment of Ex-Offenders Policy

After the pre-appointment checks

Once the pre-employment checks have been completed, the school will:

- agree a start date with the candidate
- submit contractual paperwork, including the completed DBS check, copies of identification, references and proof of qualifications, pre-employment medical enquiry form, P45, application/equal opportunities and emergency contacts
- add the required details of the checks carried out to the school's SCR

Single Central Record (SCR)

The school will maintain and regularly update our SCR.

All new employees will be added to the record, which will include:

- all staff (including supply staff) who work at the school
- all others who work in regular contact with children in the school or college, including volunteers

The bullet points below set out the minimum information that must be recorded in respect of staff members (including teacher trainees on salaried routes). The record will indicate whether the following checks have been carried out or certificates obtained, and the date on which each check was completed/certificate obtained:

- an identity check
- a barred list check
- an enhanced DBS check
- a prohibition from teaching check
- further checks on people living or working outside the UK
- a check of professional qualifications
- a section 128 check
- a check to establish the person's right to work in the UK

For supply staff, the school will include whether written confirmation has been received that the employment business supplying the member of supply staff has carried out the relevant checks and obtained the appropriate certificates, and the date that confirmation was received and whether any enhanced DBS check certificate has been provided in respect of the member of staff.

If checks are carried out on volunteers, this will be recorded in the SCR.

Records of interviews

The Trust has a responsibility to maintain a central record for the complete recruitment process for a minimum of 6 months. The following will be recorded:

- assessment and selection criteria used (person specification);
- application of assessment and selection criteria (e.g. application form);
- interview and other selection method notes (e.g. question proformas, test results);
- reasons for decisions made;
- any additional information such as copies of qualifications, etc.

All recruitment paperwork relating to the successful candidate will be retained and placed on their personnel file. Individuals are able to access all the paperwork relating to their recruitment process in accordance with the Freedom of Information Act and the Data Protection Act.

Equal Opportunities Monitoring

Applicants will be asked to complete an Equal Opportunities Monitoring Questionnaire as part of the application process. The recruitment panel will not have access to this information, with only Human Resources having access to this information for monitoring purposes. Applicants will not be eliminated from the shortlist on the grounds of:

- disability;
- gender;
- pregnancy;
- sexual orientation;
- race;
- marital status;
- religion or belief;
- age; or
- 'spent convictions' unrelated to the job other than where a genuine occupational requirement applies.

These are situations when it is possible to specify the sex, racial background, religion or sexual orientation of the person that we wish to carry out a role, if there is an objective justification for doing so and where this requirement is a proportionate means of achieving a legitimate aim. Advice will be sought from Human Resources before advertising a role where it is believed a genuine occupational requirement applies. The Equality Act 2010 also limits the circumstances when an employer can ask general health-related questions before a job offer has been made.

Breaches of this policy

Any instances of this policy not being adhered to will be taken very seriously and appropriate disciplinary action may be taken.

Policy & Procedure Monitoring and Review

This policy is reviewed annually by the Head of People.

Any changes made to this policy will be communicated to all members of staff by the school.

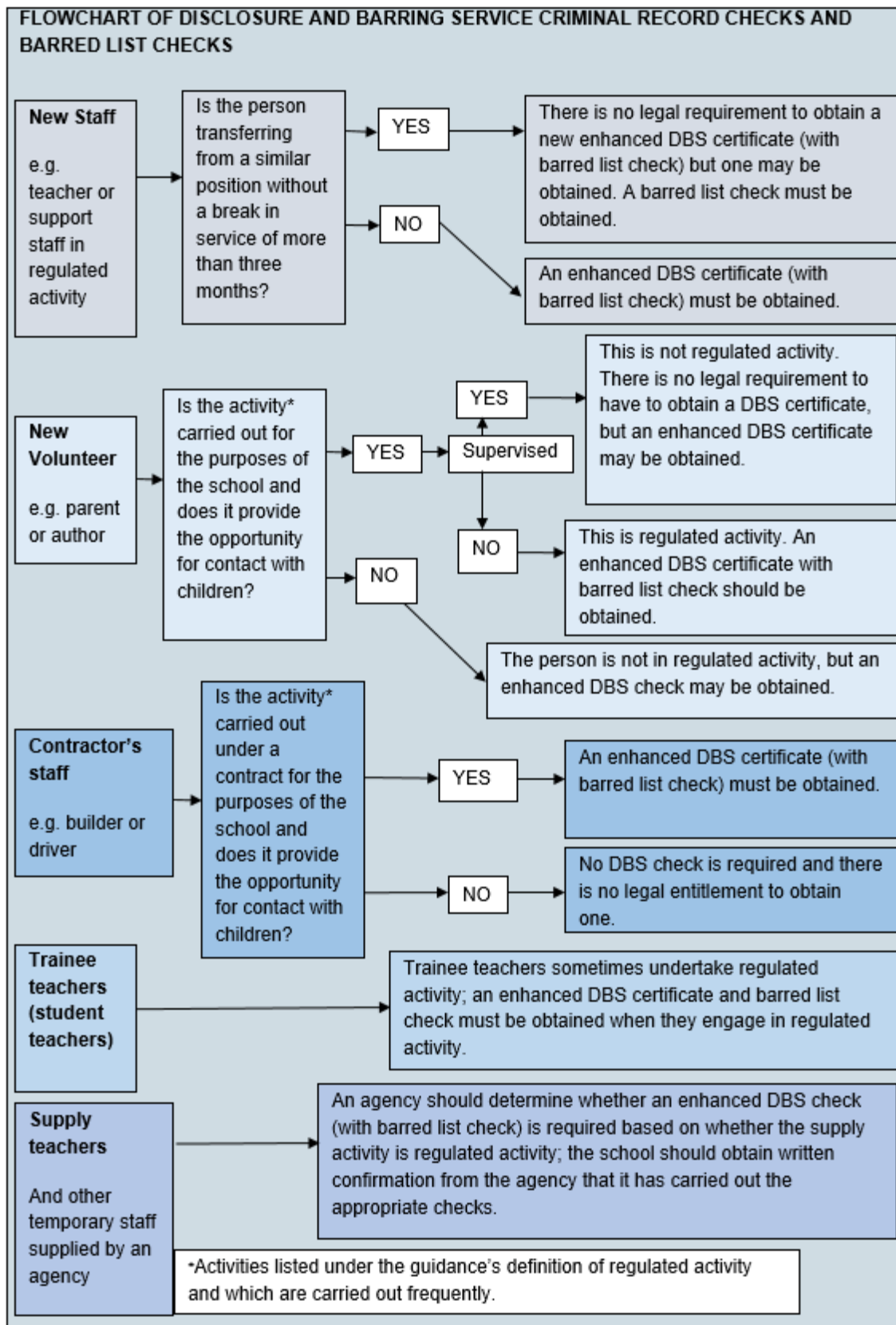
All members of staff are required to familiarise themselves with all processes and procedures outlined in this policy as part of their induction programme.

This policy has due regard to all relevant legislation including, but not limited to, the following:

- Children Act 1989
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006 (as updated)
- The Education (Academy Teachers' Appraisal) (England) Regulations 2012 (as amended)
- Sexual Offences Act 2003
- The Academy Staffing (England) Regulations 2018
- Rehabilitation of Offenders Act 1974
- Education and Skills Act 2008
- Data Protection Act 2018
- Education Act 2002
- Equality Act 2010

This policy has due regard to guidance including, but not limited to, the following:

- DFE (September 2023) 'Keeping children safe in education'
- DFE (October 2021) 'Staffing and employment advice for academies'



What will be filtered by the DBS?

Since May 2013, standard and enhanced DBS checks stopped disclosing all cautions and convictions after the introduction of a process referred to as 'filtering'. In response to a Supreme Court ruling in 2019, the government announced further changes to the process which came into force on 28 November 2020.

The changes which have been made to the criminal records disclosure regime apply to jobs and voluntary roles that involve a standard or enhanced check issued by the Disclosure and Barring Service (DBS). The new rules mean that;

- Warnings, reprimands and youth cautions (including conditional cautions) will no longer be automatically disclosed on a DBS certificate.
- The multiple conviction rule has been removed. This means that individuals with more than one conviction will have each conviction considered individually against the criteria, rather than all being automatically disclosed

How it works

'Filtering' is similar in its concept to the rehabilitation periods under the Rehabilitation of Offenders Act 1974. However, instead of establishing what is 'spent' and so what doesn't get disclosed on a basic check, 'filtering' establishes what doesn't get disclosed on a standard or enhanced DBS check.

Information that is filtered will be removed from a DBS check automatically the next time you apply for one. But it doesn't get 'removed' or 'wiped' from police records. In practice, it means that if you're applying for a job or role that involves a DBS check, you are legally entitled to withhold the details of anything that would now be filtered.

For more information, please see

[DBS filtering guide - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/db filtering-guide)

Recruitment of Ex-Offenders Policy

As an organisation assessing applicants' suitability for positions which are included in the Rehabilitation of Offenders Act 1974 (Exceptions) Order using criminal record checks processed through the Disclosure and Barring Service (DBS), the Beyond Schools Trust complies fully with the code of practice and undertakes to treat all applicants for positions fairly.

The Beyond Schools Trust undertakes not to discriminate unfairly against any subject of a criminal record check based on a conviction or other information revealed.

The Beyond Schools Trust can only ask an individual to provide details of convictions and cautions that the Beyond Schools Trust are legally entitled to know about. Where a DBS certificate at either standard or enhanced level can legally be requested (where the position is one that is included in the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 as amended, and where appropriate Police Act Regulations as amended).

The Beyond Schools Trust can only ask an individual about convictions and cautions that are not protected.

The Beyond Schools Trust is committed to the fair treatment of its staff, potential staff, or users of its services, regardless of race, gender, religion, sexual orientation, responsibilities for dependants, age, physical/mental disability, or offending background.

The Beyond Schools Trust has a written policy on the recruitment of ex-offenders, which is made available to all DBS applicants at the start of the recruitment process.

The Beyond Schools Trust actively promotes equality of opportunity for all with the right mix of talent, skills, and potential and welcomes applications from a wide range of candidates, including those with criminal records.

The Beyond Schools Trust select all candidates for interview based on their skills, qualifications, and experience. An application for a criminal record check is only submitted to DBS after a thorough risk assessment has indicated that one is both proportionate and relevant to the position concerned. For those positions where a criminal record check is identified as necessary, all application forms, job adverts, and recruitment briefs will contain a statement that an application for a DBS certificate will be submitted in the event of the individual being offered the position.

The Beyond Schools Trust ensures that all those in the Beyond Schools Trust who are involved in the recruitment process have been suitably trained to identify and assess the relevance and circumstances of offences.

The Beyond Schools Trust also ensures that they have received appropriate guidance and training in the relevant legislation relating to the employment of ex-offenders, e.g., the Rehabilitation of Offenders Act 1974

At interview, or in a separate discussion, the Beyond Schools Trust ensures that an open and measured discussion takes place about any offences or other matter that might be relevant to the position. Failure to reveal information that is directly relevant to the position sought could lead to withdrawal of an offer of employment.

The Beyond Schools Trust makes every subject of a criminal record check submitted to DBS aware of the existence of the code of practice and makes a copy available on request.

The Beyond Schools Trust undertakes to discuss any matter revealed on a DBS certificate with the individual seeking the position before withdrawing a conditional offer of employment.