

Recruitment & Retention Policy

At Pabulum we recognise that recruiting and retaining the right staff is at the heart of providing the dedication, attention and service commitment our business thrives on. We aim to create and maintain a skilled, balanced, conscientious and committed team that reflects the diversity of the people we serve.

This policy does not form part of any employee's contract of employment and we may amend, update or supplement the policy from time to time.

Recruitment

Responsibility

The following process **must** be adhered to for all vacancies whether permanent or casual.

Assessing a vacancy

Before advertising a role, the line manager will consider:

- Why the previous employee left? This may highlight problems within the unit which need to be resolved.
- Whether it is possible to reorganise working arrangements. Existing employees may welcome the opportunity to increase their basic hours or working practices may be changed to absorb the duties of the employee who has left. Casual staff may be offered permanent employment.
- The use of overtime. This may prove a solution for the short term or during busy times of the year.
- The skills and attributes required for the role together with an up-to-date job description, benefits, hours etc.

Recruitment – advertising for candidates

No recruitment advertising will commence until full authorisation is obtained through the Authorisation to Recruit (ATR) workflow. Depending on the function of the role, vacancies can be advertised through a variety of media. The appropriate method will be discussed with the HR department but can include: - job board advertising, social media, industry specific media, local press and employment agencies. All roles are automatically posted onto the Pabulum website and the Job Centre.

The Company's Equal Opportunities Policy should be adhered to at all times.

Interview process – permanent vacancies

The interview process will be formal. All candidates applying for a permanent position will be pre-screened by the Recruitment Advisor. This will include questions on Safeguarding to ensure Pabulum adhere to the Safer Recruitment Guidelines. Once pre-screened a shortlist will be provided to the interviewing representative, to consider for interview. Feedback by the



interviewing representative should be given to the Recruitment Advisor within 5 working days or to bring in for interview. The Recruitment Advisor will arrange interviews.

To ensure a fair procedure has been followed and that Pabulum adheres to the Safer Recruitment Guidelines, the interviewer is to make a record of all interviews conducted using the correct Pabulum interview template; the interview template can be found on Pabunet or can be obtained from the HR department (recruitment@pabulum-catering.co.uk).

The interview will allow for the collection of information to predict how the individual would perform against set criteria for the job (i.e. the job description) and provide the candidate with further details of the job and the organisation.

If feedback isn't given by the appropriate interview representative on shortlisted candidates, within 5 working days, recruitment advertising will cease, and no further CV's will be sourced.

Once interviews have taken place, feedback must be given by the interviewing representative to the Recruitment Advisor within 48 hours of each interview - whether it is for a successful or for an unsuccessful candidate.

Successful candidate

When a decision has been made, regarding a successful candidate, the hiring manager should liaise with the Recruitment Advisor who will make the offer of employment. All offers of employment are subject to satisfactory references, DBS/security check and provision of evidence of eligibility to work in the UK.

Unsuccessful candidates

The Recruitment Advisor will provide feedback to the unsuccessful candidate as soon as possible.

Casual vacancies

The hiring manager is responsible for arranging interviews and the full interview process for Casual vacancies. All other aspects of the above process are to be followed.

Administration – custody and security of supporting documents

Compliance with GDPR regulations requires any paperwork relating to candidates should be returned to Recruitment in the Fleet Office where it will be kept for 6 months before being destroyed.

References

The offer of employment is subject to satisfactory references. Hiring Managers are to seek consent from the candidates to approach two individuals for references, from the previous two employers. The named individuals must be in a managerial position (not a colleague or work friend) and must not be from the same employer.

If the person has not been employed in the past 5 years, they will be asked to provide details of an unrelated person, not living at the same address, who can provide a character reference.

Unsatisfactory references will be brought to the attention of the hiring manager, who will discuss with the candidate regarding the reference and to seek an appropriate resolution. A



decision will then be made by the Head of People in consultation with the relevant departmental Board Director as to whether the offer of employment will still continue.

Disclosure & Barring Service (DBS)

Pabulum is committed to complying with data protection obligations and the DBS Code of Practice in relation to criminal record information. The Code of Practice can be found on the Government website and by clicking [here](#).

This policy applies to criminal record information relating to job applicants and current and former staff, including employees and temporary and agency workers.

Pabulum will treat all applicants and employees fairly but reserve the right to withdraw an offer or contract of employment if an individual does not disclose relevant information, or if a DBS check reveals information or where Pabulum become aware of information which it is reasonably believed would make an individual unsuitable for the role.

Pabulum has a legal duty, when recruiting staff to work in regulated activity with children, to check whether they are on the relevant children's barred list. If a prospective or current employee's name does appear on the relevant barred list, it would be against the law for Pabulum to employ or continue to employ them to work with the relevant group.

Employees must hold an enhanced criminal record certificate, also referred to as an enhanced DBS (Disclosure and Barring Service) check, as a condition of employment as all roles within Pabulum are:

- a) excepted from the Rehabilitation of Offenders Act 1974 i.e. included in the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (as amended); and
- b) prescribed in the Police Act 1997 (Criminal Records) Regulations 2002.

In addition, a search of the children's barred list is required if the position is:

- a) eligible for an enhanced DBS check; and
- b) prescribed in the Police Act 1997 (Criminal Records) Regulations 2009 as one for which the children's barred list may be checked.

An enhanced DBS check will show:

- convictions, including those that are spent, plus any cautions administered (subject to the rules on filtering). Further information on 'filtering' can be found below.
- other information which a relevant chief police officer reasonably believes is relevant and ought to be included; and
- where appropriate, whether the individual is on either (or both of) the children's or the adults' barred list.

Pabulum will ask if the candidate is aware that a full DBS check would be carried out if the candidate was successful for the role at interview. For further information on filtering see below.

Pabulum will only carry out a DBS check once the employee has a conditional offer of employment and in the case of existing employees the check will be repeated every 3 years. Staff may also be required as a condition of their employment to notify Pabulum about certain convictions and cautions which occur at any point subsequent to recruitment and during the period of time that they are employed by the Company. Further information on this, including



what convictions or cautions do not need to be disclosed, are stated in the individual's contract of employment and in this policy.

If Pabulum has concerns about criminal record information that has been disclosed by the individual or by the DBS, or the information is not as expected, Pabulum will discuss its concerns with the prospective or current employee and carry out a risk assessment.

Pabulum will where necessary, disclose unclear records to the School via risk assessment document; employment at that site will require the School's approval. The matter will be discussed with the applicant or employee before any disclosure to the School takes place. The amount of detail disclosed will usually be of a high level (eg minor traffic offence) apart from if the conviction relates to children, violence and/or drugs. In such cases it will be the decision of the School as to if the individual employee is considered suitable by them for employment. Pabulum will require written confirmation from the School should they wish Pabulum to withdraw the offer of employment or terminate the contract of employment.

Where a DBS certificate has disclosed any matter or information or any criminal record information that has been provided to Pabulum, a copy of the certificate will also be provided to the relevant School.

Candidates or employees will not be allowed to commence/re-commence employment until a satisfactory DBS check has been received. Pabulum can on request obtain a check of the children's barred list pending an enhanced DBS check, to enable an employee to commence earlier. This is subject to a risk assessment being undertaken and agreement in writing with the School.

In the event of any future applicant who has worked or lived abroad applying for employment, Pabulum will ask the applicant to provide written confirmation from the relevant police authorities confirming a clean police record for safeguarding purposes and, where applicable, written confirmation from the professional regulating authority in the countries in which the applicant has worked confirming that they have not imposed any sanctions or restrictions, and/or that they are aware of any reason why the applicant may be unsuitable to work in a school.

If agency workers (non-Pabulum employees) are required at the school, they will be required to provide DBS clearance and carry this at all times. The supplying agency will be required to satisfy Pabulum that all employment checks as outlined above have been carried out.

Before instructing an umbrella body (an umbrella body being a registered body which countersigns applications and receives certificate information on behalf of other employers or recruiting organisations), Pabulum will take all reasonable steps to confirm that the body will handle, use, store, retain and dispose of certificate information in full compliance with the DBS Code of Practice and in full accordance with this policy.

Charges for each disclosure check will normally be paid by Pabulum and then recovered from the school; for head office and mobile staff no recovery is made from the individual nor from the school.



Filtering of protected convictions and cautions

Certain old and minor convictions and cautions are 'protected', which means:

- (a) they are filtered out of a DBS check;
- (b) they need not be disclosed by prospective employees to the Company; and
- (c) they will not be taken into account by the Company in making decisions about employing a prospective employee.

Certain 'listed offences' will never be filtered out (for more information see the Government guidance at the link here). The list includes offences which are particularly serious, relate to sexual or violent offending or are relevant in the context of safeguarding.

A conviction will be a protected conviction (i.e. filtered out) if:

- (a) the offence was not a listed offence;
- (b) it did not result in a custodial sentence (or sentence of service detention); and
- (c) where the individual was an adult (18 or over) at the time of conviction, 11 years or more have passed since the date of the conviction (or five years six months or more have passed since the date of conviction if the individual was under 18 at the time of conviction).

A caution will be a protected caution (i.e. filtered out) if:

- (a) the person was under 18 years of age at the time the caution was given; or
- (b) the person was 18 years old or over at the time the caution was given, and
 - (i) the offence was not a listed offence; and
 - (ii) six years or more have passed since the date of the caution.

As part of an Enhanced Criminal Record Certificate, the police may also disclose information that they reasonably believe is relevant and ought to be included.

For further guidance on filtering, see the DBS filtering guidance on the Government's website or by clicking [here](#).

Data Storage and access

All employee paper DBS records are held centrally at Pabulum's Head Office. DBS certificate numbers and expiry dates for each individual employee will be made available in accordance with relevant service contract for the school. Employees receive their original DBS certificate via the third-party provider and are required to provide a copy to Pabulum. For Unit employees, the Operations Manager is responsible for this to be completed

Pabulum will ensure that DBS certificate information is kept securely, in lockable, non-portable, storage containers with access strictly controlled and limited to those who are entitled to see it as part of their duties.

Handling

In accordance with section 124 of the Police Act 1997, the Company will ensure that certificate information is only passed to those who are authorised to receive it in the course of their duties. Pabulum maintains a record of all those to whom certificates or certificate information has been disclosed. It is a criminal offence to pass this information to anyone who is not entitled to receive it.

Once the DBS certificate has been inspected, it will be destroyed in accordance with the Code of Practice.



The Head of Food, Health, Safety and Environment at is responsible for data protection compliance at Pabulum, including in relation to criminal records information. Any questions or comments about the content of this policy or if further information is required, the point of contact is the Head of People, tracyadams@pabulum-catering.co.uk or telephone on 07464 675186

Retention of DBS information

Once a recruitment (or other relevant) decision has been made, Pabulum will not keep certificate information for any longer than is necessary. This is generally for a period of up to six months after the employee has left the business, to allow for the consideration and resolution of any disputes or complaints. This is known as the retention period.

If, in very exceptional circumstances, it is considered necessary to keep certificate information for longer than six months, Pabulum consult the DBS to ensure it continues to meet its obligations for data protection and human rights of the individual.

Disposal of DBS information

Once the retention period has elapsed, Pabulum will destroy DBS certificate information by secure means, e.g. by shredding, pulping or burning. While awaiting destruction, certificate information will not be kept in any insecure receptacle (e.g. waste bin or confidential waste sack).

Pabulum will not keep any photocopy or other image of the certificate or any copy or representation of the contents of a certificate. However, notwithstanding the above, Pabulum may keep a record of the date of issue of a certificate, the name of the subject, the type of certificate requested, the position for which the certificate was requested, the unique reference number of the certificates and the details of the recruitment decision taken.

Contracts and Employee Handbook

Contracts of Employment are issued to all employees before they commence their first day. Contracts will vary according to the type of employment and whether they are a casual employee or not.

Two copies of the contract, along with the Employee Handbook will be sent to the employee's home address. One copy of the contract should be signed and returned to the HR Department.

Monthly Equated Pay

Employees who work in schools and colleges and who work term time only will be paid on an equated pay basis. It is essential that this is explained to new starters who may not have been paid by this arrangement before.

Retention of employees

Induction

All employees, including those who work on a casual basis, will be fully trained. This will be a blended approach via our E-Learning Portal (which should be completed before employment commences) and induction/on-the-job training from their Line Manager. Training is conducted to:



1. Provide any safety information relating to their job.
2. Show employees what is expected of them by Pabulum, e.g. rules and Company objectives.
3. Answer any initial queries the employee may have about their employment.
4. Issue any relevant policies and procedures and uniforms.
5. Welcome the new employee into the Company.

Employee Survey

The Company has an ongoing commitment to all staff to give them the opportunity to feed back their opinions about Pabulum. The Employee Survey is communicated to all employees at least on an annual basis.

Recognition

Pabulum is fully committed to recognising those employees who have 'gone the extra mile' in their role. As such Pabulum has employee recognition awards for people to demonstrate their motivation and dedication. Amongst other ways, these are presented in the annual company meeting in recognition of individual achievement.

Nelson Williams
Managing Director

(This policy will be reviewed in June 2023)

